

our ref EIA/1/2019
your ref c18158/EIA Screening Request 24-04-19
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14th May 2018

Dear Ms Walker,

SCREENING OPINION PURSUANT TO REGULATION 6 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

Red House Farm Neighbourhood: Land at Red House Farm, Westerfield Road, Ipswich

Ipswich Borough Council, in pursuance of Regulation 6 of the above regulations, hereby provides a **Screening Opinion in relation to the development as proposed within their authority boundary only.** It is recognised that this development is part of a larger project known as Ipswich Garden Suburb and that part of this wider site is within the authority boundary of East Suffolk.

The Screening Opinion is attached. The Screening Opinion is based upon the information submitted to the Council on the 24th April 2019.

The Screening Opinion indicates that an Environmental Impact Assessment for the development **IS REQUIRED**. Accordingly, the Council adopts this Screening Opinion in accordance with the provisions of Regulation 6 (6) of the Regulations to the effect the development is EIA development and that an Environmental Statement is required. The scope of this Environmental Statement would be determined by the submission of a Scoping Opinion. Please note that this conclusion does not mean that Ipswich Borough Council would support any application for the proposed development under any subsequent order.

In accordance with Regulation 23 of the 2017 Regulation the Screening Opinion has been placed on Part 1 of the Planning Register.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Martyn Fulcher', written in a cursive style.

Martyn Fulcher MRTPI
Head of Development
Ipswich Borough Council

**IPSWICH BOROUGH COUNCIL
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT
REGULATIONS 2017**

SCREENING OPINION

APPLICATION DETAILS

Application Number (if known)	Not applicable
Address	Red House, Ipswich
Description of development	N/A

SCREENING OPINION DETAILS

Screening Opinion Reference Number	EIA/1/2019
Date of Request	24 th April 2019
Date of Screening Request Due	14 th May 2019
Revised date where extension to deadline agreed in writing	N/A

EIA SCHEDULES 1 AND 2

Schedule 1	No	Schedule 2	Yes
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SCHEDULE 1 DEVELOPMENT

Description of development	N/A
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Where a proposal is Schedule 1 development an EIA must be undertaken.

Schedule 2 Development

Schedule 2 section number	Schedule 2, 10 (b)
Description of the development (column 1 of Schedule 2)	10. Infrastructure projects (b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas.
Applications thresholds and criteria (column 2 of Schedule 2)	10. Infrastructure projects (b)(ii) the development includes more than 150 dwellings (iii) the overall area of the development exceeds 5 hectares
Does the proposal exceed any thresholds	The application proposes up to 1100 dwellings on a site area of 53.2 hectares exceeding the thresholds set out at 10 (ii) and 10 (iii).
Is the development or	No.

any part of it within a 'sensitive area'	
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In accordance with Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 the submission is considered against the relevant selection criteria for screening Schedule 2 Development as follows:-

1. Characteristics of the development

1. The characteristics of development must be considered with particular regard to—

- (a) the size and design of the whole development;
- (b) cumulation with other existing development and/or approved development;
- (c) the use of natural resources, in particular land, soil, water and biodiversity;
- (d) the production of waste;
- (e) pollution and nuisances;
- (f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;
- (g) the risks to human health (for example, due to water contamination or air pollution).

The development proposed is for outline planning permission for 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. No further design or reports were submitted with the screening request.

The site identified for development, the subject of this screening request, forms part of what has been identified within the Ipswich Borough Council Core Strategy (2017) as a Local Plan Site Allocation for an urban extension to Ipswich known as the Ipswich Garden Suburb (IGS). Therefore the impacts of the development need to be assessed both on its own and in combination with the wider effects from the full development of the Ipswich Garden Suburb.

The Ipswich Garden Suburb is a comprehensively planned urban extension, which is residential led with supporting infrastructure. Local Plan Policy CS10 (Ipswich Garden Suburb) and the adopted Ipswich Garden Suburb SPD (22nd March 2017) have proposed three neighbourhoods for the overall site and the infrastructure required to be delivered both at a neighbourhood and strategic level. The proposed neighbourhoods are known as Red House, Fonnereau and Henley Gate

The site, the subject of this screening request, forms the majority of the neighbourhood identified in the Ipswich Garden Suburb SPD as Red House. The site excludes a narrow strip of land along the eastern side of Westerfield Road and excludes a group of existing farm buildings, a wooded area immediately to the north and fields immediately to the south of the farm buildings as these fall within separate land ownership. It is located on the eastern side of Westerfield Road.

The Fonnereau Neighbourhood is located immediately west of the development site, on the western side of Westerfield Road. The Henley Gate neighbourhood is located to the north of the Fonnereau Neighbourhood and the railway line.

There are currently two planning applications before the Council for determination. Application 14/00638/OUTFL is for:

An outline planning application for a mixed use development for up to 815 dwellings (C3); a district centre (with up to 7,360 sqm of floorspace in the following use classes: A1 retail (not exceeding 4,540 sqm), financial services (A2), restaurants, pubs and takeaways (A3, A4, A5), business uses (B1a), dwellings and institutional residential uses (C2, C3) and non-residential institutions (including health centre (D1) and leisure uses (D2)); a primary school (D1); vehicular access from Westerfield Road (x2) and Henley Road (cycle, pedestrian, emergency vehicle, temporary bus route only); provision of public amenity space; provision of infrastructure (including highways, parking, cycle, pedestrian routes, utilities and sustainable drainage systems); landscaping and engineering works (including ground remodelling and enabling works). Works proposed will affect Tree Preservation Orders and public rights of ways within the application site. An Environmental Statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011.

Application 16/00608/OUT:

An outline planning application for a mixed use development comprising up to 1,100 residential dwellings (use class C3); a local centre (to accommodate up to 250sqm (net) of convenience floor space (A1), up to 300sqm of comparison floorspace (A1), up to 250sqm in use classes A1-A5 and up to 500sqm community centre (D1); provision of land for a primary school (D1); provision of sports facilities, Country Park (including visitor centre (D1)); open space (including amenity space, children's play areas and allotments) and sustainable urban drainage systems; associated landscaping, infrastructure and engineering/earthworks; creation of 2No. new vehicular accesses from Henley Road, 1No. vehicular access from Westerfield Road (to serve Country Park only), and provision of access points to allow for pedestrian/cycle bridge over railway and vehicular bridge over railway. An Environmental Statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 (as amended).

The impacts of the development as proposed will be the result of the significant change in the nature from the current agricultural land use to an urban area, which will without question have impacts that needs to be assessed. The extent of these impacts are compounded by the scale of both the development itself but also in combination with the scale of the wider, Ipswich Garden Suburb.

The urbanisation of this currently agricultural land will on its own and in combination with the wider Ipswich Garden Suburb will cause a significant impact on the landscape character on the northern edge of the Ipswich's Administrative Boundary. The construction of a development of this scale needs to assess the impact on the topography of the site and impact on soil as a natural resource as a result of any necessary cut and fill required on this site in

order to build the housing and other infrastructure components that make up the proposed development.

The urbanisation of this site as a result of the proposed development and in combination with the wider Ipswich Garden Suburb development will give rise to a significant increase in the traffic generated during both the construction and operational phases of development. The impact this has upon the Ipswich road network needs assessment. Inextricably linked to the significant increase in the traffic generated by the urbanisation of this site and the wider Ipswich Garden Suburb site is the impact upon air quality.

Ipswich Borough Council currently has 5 declared Air Quality Management Areas. The increase in the traffic that would be generated by both the development alone and in combination with the rest of the Ipswich Garden Suburb and other committed developments would give rise to the potential for air pollution that would need to be assessed.

The urbanisation of this site will have a significant impact on the nature of the habitat that the site provides for biodiversity. The urbanisation of this site and its impact on the European Protected Orwell and Stour Estuaries must also be considered as it is within the required zone of influence.

Location of Development:

2.—(1) The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to—

- (a) the existing and approved land use;
- (b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
- (c) the absorption capacity of the natural environment, paying particular attention to the following areas—
 - (i) wetlands, riparian areas, river mouths;
 - (ii) coastal zones and the marine environment;
 - (iii) mountain and forest areas;
 - (iv) nature reserves and parks;
 - (v) European sites and other areas classified or protected under national legislation;
 - (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
 - (vii) densely populated areas;
 - (viii) landscapes and sites of historical, cultural or archaeological significance.

The site identified covers an area of approximately 53.2 hectares. The site identified contains no built development and comprises a number of substantial agricultural fields, which are separated by hedgerows interspersed with trees. There is an existing track which runs through the site from Red House Farm to the north towards Westerfield. It is bounded on the west by Westerfield Road (B1077) and existing residential development to the south. The railway line forms the boundary on the eastern edge, which curves around to Westerfield station, which is located just outside the identified site to the north-west.

The site has a number of tree preservation orders and areas, particularly in the northern part, susceptible to surface water flooding.

The Red House area is situated in a valley bottom with a watercourse from the Millennium Cemetery flowing around and towards the north.

There are no ecological designations that cover the identified site however there are a number of statutory and non-statutory designations located within the vicinity of the identified site. The Stour and Orwell Estuaries Protection Area (SPA) and Ramsar Site has a European level designation and lies approximately 4 km to the south of the site, within its zone of influence.

The site forms part of a wider area identified in the Ipswich Local Plan as the Red House Neighbourhood, part of the Ipswich Garden Suburb. This wider site includes Red House

Farm, which was part of the Red House Park country estate which originally occupied much of the south eastern portion of the garden suburb development area. The 18th century mansion has been demolished the Victorian farm group remains. Red House Farm is included in Ipswich's Local List and dates from approximately 1870. It includes the main farmhouse and grounds and a compact group of farm outbuildings. Red House farm is under the NPPF (Feb 2019) a heritage asset.

Characteristics of potential impact (in relation to criteria 1 and 2 above):

3. The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—

(a)the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);

(b)the nature of the impact;

(c)the transboundary nature of the impact;

(d)the intensity and complexity of the impact;

(e)the probability of the impact;

(f)the expected onset, duration, frequency and reversibility of the impact;

(g)the cumulation of the impact with the impact of other existing and/or approved development;

(h)the possibility of effectively reducing the impact.

The purpose of the Environmental Statement is to protect the environment and when a local planning authority determines a planning application they do so in full knowledge of any likely significant effects as a result if the development. (NPPG – Environmental Impact Assessment - Paragraph 002 Reference ID: 4-002-20140306)

Annex: Indicative screening thresholds of the NPPG (Environmental Impact Assessment) Paragraph 057 Reference ID: 4-057-2070720 identifies indicative thresholds for the scale of development which are likely to give rise to significant effects resulting from a development that would require an Environmental Impact Assessment. The threshold for an urban project is a new development of more than 1,000 dwellings. The key issues for consideration are the physical scale of such development, potential increase in traffic, emission and noise.

The proposed development both on its own with 1100 dwellings and in combination with the wider IGS (3,500 dwellings) clearly exceeds the indicative thresholds.

The proposed development of 1100 dwellings with other educational and retail uses covering an area of over 53 hectares will by its nature and scale urbanise what is currently land in agricultural use. The significant change in the character of the land use will result in urbanising effects and the scale of the development alone is likely to result in significant effects on transport and air pollution that would need to be assessed.

This project also needs to be considered in combination with the wider Ipswich Garden Suburb which covers an area of approximately 195 hectares and has a Local Plan Policy allocation for up to 3,500 dwellings. The identified site forms part of the Ipswich Garden Suburb which is a Local Plan Policy Allocation for up to 3,500 dwellings with supporting infrastructure and the impact of the proposed development together with the rest of the Ipswich Garden Suburb. The development of this wider site will have significant impacts upon the character of the area in terms of, but not limited to, landscape and visual impact, transport, air quality and noise.

The EIA screening request received has set out that Ipswich Borough Council has sufficient information available to determine that the proposed development would not cause significant harm and that any impacts identified could be mitigated. Reference is made to the Environmental Statements submitted with application 14/00638/OUTFL and 16/00608/OUT. The EIA screening request sets out that these Environmental Statements states that where impacts from these developments were identified that they were generally mitigatable.

As the Local Planning Authority Ipswich Borough Council must ensure when decision making that it considers a development with the full knowledge of any likely significant effects. The reliance on the Environmental Statements that have been submitted for what are different sites and for different developments, albeit it is recognised for similar land uses and forming part of the wider IGS, would nevertheless not be in accordance with the purpose of the EIA regulations.

The likely significant effects of this project cannot be fully informed by Environmental Statements that did not consider the specific impacts for the site and the development the subject of this screening request.

Whilst those Environmental Statements referred to the impact of the development to which they related and that for the matters of transport, air quality and noise, it is acknowledged that the associated traffic modelling data has included traffic for the full extent of the Ipswich Garden Suburb development, these impacts were based on potential development coming forward. It must also be factored in that the conclusions of the Environmental Statements identified both beneficial and adverse effects and measures were identified to reduce or eliminate the adverse effects. These mitigation measures were site and development specific and cannot be relied upon to mitigate the impacts of this proposed 1,100 home development, the subject of this screening request.

The purpose of this screening request is to determine if there would be likely significant effects as a result of the development. The following set out impacts that could be significant. It is for a Scoping Opinion to ascertain what matters an Environmental Impact Assessment would need to include.

An urban project of this scale will have traffic implications that are likely to be significant. The reliance on the conclusions of earlier Environmental Statements, those that accompanied applications 14/00638/OUTFL and 16/00608/OUT in this instance are not considered to be sound. Both of these ESs used a baseline year of 2016 for the traffic modelling with this baseline being three years old and without a clear identification of when any application for planning permission may be submitted for the development this baseline

data cannot be reasonably relied upon to provide up to date information to assess the likely significant impacts of the development.

Furthermore the Environmental Statements have considered the development cumulatively with future scenario dates of 2029 (application 14/00638/OUTFL) and 2030 (application 16/00608/OUT). The development of this scale will take many years to complete and based on the information submitted and without any evidence to contract this position, it would be reasonably expected that the future date scenarios for this development would need to assess beyond the year 2030. For the Local Planning Authority to be fully informed of the likely significant impacts arising from the development further assessment beyond 2030 would be required.

The purpose of an Environmental Impact Assessment is to assess the likely impacts of the development alone and the cumulative effects from in combination development. The Environmental Statements accompanying the current applications on the Ipswich Garden Suburb are assessed under the transitional arrangements for the EIA Regulations 2011. The development proposed under this screening request, at this time, would be assessed under the EIA Regulations 2017 where to ensure completeness and quality of the Environmental Statement this must be prepared by competent experts. This includes details of the experts qualification. This is to ensure that the Local Planning Authority has sufficient information to make a fully informed decision on the impacts of a development. As part of this quality, the likely significant effects of this development need to be assessed on up to date data to ensure a reliable conclusion. The screening request does not provide any evidence to substantiate that this data is reliable nor that it covers all of the potential years of development.

The screening request identifies improvements will be made to the road network to mitigate identified impacts. The mitigation measures identified include the site will be served by a bus service and provision will be made for good accessibility for cyclists and pedestrians. The EIA Regulations 2017 does allow for mitigation to be identified as part of the screening request to identify how any impacts can be mitigated. As a Local Planning Authority this statement is not sufficient for IBC to be confident that the likely significant impacts from the traffic generation of this development and the wider IGS can be sufficiently mitigated. Ipswich Garden Suburb as a comprehensive development has mitigation i.e. road improvements and the provision of a bus service that is reliant on being delivered by another site/planning application For this reason the probability of likely significant effect on the road network cannot be ruled out.

The assessment of the likely significant impacts from the development upon air quality are based on the traffic modelling data. As it is not been evidenced the base data from the previously submitted Environmental Statements is up to date the conclusions on this matter of this cannot be relied upon to conclude there would not be any likely significant effects from the proposed development.

Ipswich Borough Council currently has 5 declared Air Quality Management Areas. The fifth AQMA was declared in 2018 and both current applications on the Ipswich Garden Suburb had to have addendums to address this.

The increase in the traffic that would be generated by both the development alone and in combination with the rest of the Ipswich Garden Suburb and other committed development would give rise to the potential for likely significant effects on the air pollution that would need to be assessed. As detailed above without reliable evidence on the traffic modelling it cannot be concluded that there would not be adverse impacts on air quality. No specific mitigation was provided with the screening request to mitigate for any likely significant

impacts from the development. For this reason the probability of likely significant effect on the air quality cannot be ruled out.


The scale of the development has the potential to cause impacts of noise mainly as a result of the increase in traffic generation. For the reasons set out above the reliance of the evidence included within the Environmental Statements for different applications should not be relied upon and the potential for likely significant impacts should be assessed for this development. For this reason, the probability of likely significant effect of noise cannot be ruled out.

As set out above the likely significant impacts of the development are not limited to traffic, air quality and noise. The Ipswich Garden Suburb has been comprehensively planned and some of the mitigation that the Red House Neighbourhood would be reliant upon (for example road improvements and Habitat Regulation Mitigation by the IGS the Country Park) is to be secured by another site/planning application. For this reason the probability of likely significant effects as a result of the development on cannot be ruled out.

Screening Conclusion:

Recommendation: The proposed development has been considered against The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and the National Planning Policy Guidance – Environmental Impact Assessment (19th March 2019) and for the reasons outlined in this report and the considerations set out in Appendix 1 attached, the Council have determined that in its opinion the proposed development **does constitute EIA development and the production of an Environmental Statement will be necessary.**

Reasons: Due to the proposed change in character of the site and the scale of the development both alone and in combination with the wider Ipswich Garden Suburb it is not possible to rule out the potential for significant effects upon the local road network, air quality within Ipswich and the generation of noise.

Signed:	 Martyn Fulcher Head of Development	Date:	14.05.19
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