Representations in relation to the Habitats Regulations Assessment of the Suffolk Coastal Local Plan

March 2019
This report contains the representations received in relation to the Habitats Regulations Assessment of the Suffolk Coastal Local Plan at Final Draft Plan stage (December 2018) which were made during the consultation period 14 January to 25 February 2019. The comments are not summarised and show the text as submitted by the respondent. Representations received in relation to the Final Draft Local Plan or the Sustainability Appraisal Report are presented in separate documents.
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Charity Trustee Stepping Stones for Biodiversity (Dear Sir/Madam)

Comment ID | 3
---|---
Organisation | Charity Trustee Stepping Stones for Biodiversity
First Name | Barbara
Surname | Dear Sir/Madam
Agent Organisation |
Agent First Name | Barbara
Agent Surname | Robinson

Comment | The impacts of new sewage infrastructure that will be required to deliver the CS Preferred Options needs to be included in the HRA. Likewise, the impacts of the required traffic infrastructure identified by the traffic modelling to improve the road network to allow the sustainable delivery of the CS (summarised above) also needs to be included in the HRA. If no such assessments are included in the HRA then it needs to explain why they have been omitted.

Attached documents

Comment ID | 11
---|---
Organisation | Charity Trustee Stepping Stones for Biodiversity
First Name | Barbara
Surname | Dear Sir/Madam
Agent Organisation |
Agent First Name | Barbara
Agent Surname: Robinson

Comment: There is little to celebrate in this draft plan. It goes against all the aims and ambitions of this local charity of which I am a Trustee. I nominated the late Mr Woolf for the work he had done and for the charity he had set up. He was successfully awarded the Suffolk green award.

http://sorrinews.blogspot.com/2015/06/eadt-environment-celebration.html

Stepping Stones for Biodiversity: http://steppingstonesforbiodiversity.blogspot.co.uk/

The aims of the charity:

To have small wildlife sanctuaries which are close enough to enable beetles, bumble bees, and other invertebrates, birds, reptiles and small animals to use them as Stepping Stones between areas of protected natural habitat so as to preserve genetic diversity

To encourage the use of these wildlife sanctuaries to promote the interest in natural history, observation and recording by visiting groups or individuals (which include 'vulnerable groups' who may benefit from access to these precious spaces)

These plans will have a continued detrimental affect on the charity and its aims and objectives. It will irretrievably damage the small spaces which the Charity has been working on for 8 years.

The late Mr Woolf was a founder member of Save Our country Spaces as well. Growth and expansion is too high a price to pay for the proposed destruction outlined here in this plan.

THE FOLLOWING ISSUES NEED TO BE FULLY ASSESSED & ADEQUATELY ADDRESSED IN ORDER FOR THE CORE STRATEGY REVIEW TO BE ‘SOUND’.

As a Trustee I SUGGEST THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

The “Climate Change” agenda is insufficiently addressed. Proposals are contrary to;

NPPF 10. Meeting the challenge of climate change, flooding and coastal change.

It appears that environmental, social and economic effects of the plan(s) are inadequately and inaccurately assessed against Habitats Regulations Assessments and the Sustainability Appraisals (SAs)

“Serious adverse effects” have not been properly identified, as required under compliance with the NPPF (Achieving Sustainable Development NPPF 6-17) for either the CS or development and control purposes.

This situation is likely to render any planning application almost impossible to determine properly and therefore, we say, render the major IGS planning applications problematic. It also potentially renders stakeholder responses to planning...
Representations in relation to the Habitats Regulations Assessment of the Suffolk Coastal Final Draft Local Plan

applications a problem.

**NPPF-11 Conserving and enhancing the natural environment is not adequately taken into account.**

**TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS**

The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion.

**THE FOLLOWING SPECIFIC ISSUES NEED TO BE FULLY ASSESSED & ADEQUATELY ADDRESSED IN ORDER FOR THE CORE STRATEGY REVIEW TO BE ‘SOUND’.**

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health.

The potential to secure a “sustainable future” for the existing local population, future populations and future generations is an imperative not demonstrated by the plan(s).

1. **DRAINAGE, Surface Water Drainage ; APPEARS NON-COMPLIANT and may not work.**
2. **FLOODING LIKELIHOOD may increase at Westerfield.**
3. **SEWAGE PROPOSALS INADEQUATE & likely to add to existing problems ( eg recently at Rushmere)**
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10. **COUNTRY PARK – DELIVERY APPEARS UNLIKELY UNTIL 2025 or later**
11. **Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS**

**The national planning policy framework TESTS of SOUNDNESS- NOT MET**

suggests that a local planning authority should submit a plan for examination which it considers is sound, namely that it is:

**Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

**Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS OF THE SCDC & IPSWICH DRAFT

I suggest this plan fails both Soundness and legal compliance, specifically on Environmental Health IMPACTs from likely congestion and attendant Air Quality and Pollution.

Ipswich is failing to address air pollution and it’s A Q Action Plan is inadequate. These SCDC proposals will exacerbate this critical problem.

(SEE ATTACHMENT FOR MAPS)

General Comment

As trustee of Stepping Stones and a resident of both Tuddenham, North Ipswich and Westerfield, I am appalled at the cavalier way Suffolk Coastal District Council Planning and Development Control have disregarded SCDC Strategic Planning and their Local Plan Policies over recent years. I have have no confidence in their competence, nor should the Planning Inspector.

SCDC have repeatedly failed their Community Involvement Policies. They consult then disregard and take no account of the public & resident concerns.

Failure to adhere to their CURENT Local Planning Policy means it is a free for all Planning by Appeal process which is totally out of control.

Their dysfunctional decision making and poor communications, even internally, have forced the community to take legal actions in the wider public interest. (see below)

Growing frustration at Suffolk Coastal’s ‘undemocratic’ planning system leads to calls for judicial review” PUBLISHED: 20:38 15 April 2018 | UPDATED: 09:11 16 April 2018”

https://www.eadt.co.uk/news/framlingham-residents-challenge-suffolk-coastal-s-undemocratic-planning- system-1-5477176?fbclid=IwAR2OZbd7Jwk6iLOM_wPHuVVqwq3cyk_48Lly-CpP5tVQWly3yKKNjab7SH0

In effect SCDC have capitulated to landowner developer pressure, abdicating their responsibilities and obligations to their population and that of the Ipswich Policy Area.

Our recent parish council meeting had the same findings;

http://tuddenhamstmartin.onesuffolk.net/assets/Minutes/TPC-Minutes-190129-Unapproved-DRAFT- final.pdf

Policy SCLP 12.24 Land at Humber Doucy Lane
It was agreed to make representations on the basis of both Soundness & Legality –

It does not comply with the Suffolk Coastal District Council Statement of Community Involvements as the Parish Council had not previously been consulted regarding this site (it was not mentioned in First Draft of the Local Plan).

It fails the test of Soundness as it has not been Positively Prepared in that it does not meet the needs of Tuddenham St Martin as evidenced in the Village Review 2016 (communicated to the District Council Planning Dept. in various meetings), and in that development of this site would hasten the encroachment of Ipswich towards Tuddenham.

The Ipswich Borough Council Local Plan Draft had been received recently via email (including details of the proposed development of this site) and the Parish Council would fully discuss this at the next meeting prior to replying by the deadline date of 25th March 2019.

Specific Comments on SCLP12.24

The public notices issued by IBC and SCDC are in the wrong locations for this area and are there is therefore a potential breach of the planning law and Local Plan process.

This area has already gone through due process and is at odds with the adopted approach of organic growth around Local Service Centre’s, and not a propose a large development on this site and in this area.

The Parish of Tuddenham is ‘village’, a NOT a Local Service Centre (LSC) which is deemed necessary and required to take this growth and development. Rushmere village is a LSC but does not have facilities and therefore fails the criteria for a LSC.

The area in question SCLP12.24 is part of the designated Green Rim and Green Corridor for Ipswich under current plan. It should remain so as there is a deficit of Green space in North and East Ipswich historically already identified in IBC Biodiversity and Open Space Policy Document.

This proposal is unsound as it takes no account of the established Biodiversity and Open Space BC Policy.

Policy CS16 Green Infrastructure, Sport and Recreation

The proposed allocation of land for housing at the northern end of Humber Doucy Lane and Tuddenham Road is in breach of Policy CS16 e.g. in relation to the protection and enhancement of green corridors.

Heritage and archaeology

The area in question is of great historic importance with list buildings of Westerfield House and Allen Farm. The hedgerows are ancient and suggested to be thousands of years old. The area borders and overlooks the Fynn Valley County Wildlife site, footpaths and ancient green lane.

These proposals, along with IBC lead to a substantial and unacceptable loss of amenity which is unacceptable. These proposals, along with IBC lead to a substantial and unacceptable adverse impact on the local biodiversity, green infrastructure and
local heritage.

**These development proposals by both SCDC and IBC**

The road infrastructure is characterised as ‘rat runs’ unclassified roads or narrow roads with passing

This area proposal will lead to the coalescence of Westerfield, Tuddenham and will adversely impact on the sensitivity of the Fynn Valley and the need to address light Pollution and ancient

Post Brexit food security will be an issue with the need to protect “Best and Most Versatile” Grade 2 farming

The delays and continuing viability issues of the Ipswich Garden Suburb persist which will impact on this proposal Therefore, this land area proposal is both unnecessary and premature.

There is no mention of the Felixstowe Freight line planned increase and the adverse impact this will have on passenger rail services and transport mitigation.

The Plan go against the following Suffolk Coastal District Council Core Strategy and Development Management Development Plan policies;

- SP1 Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP1A Presumption in Favour of Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP16 Sport and Play (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP19 Settlement Policy (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP29 The Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- DM3 Housing in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- DM4 Housing in Clusters in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- DM23 Residential Amenity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP15 Landscape and Townscape
- DM21 – Aesthetics

Like the North Fringe Protection Group, we also share their concerns, outlined here.

We challenge the need for future development after 2031 in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road:

1. **The Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018** Section 4.3 Land Northeast of Ipswich IP2 (Suffolk Coastal) recognises the sensitivity of the open land between the edge of suburban
Ipswich and the villages of Westerfield and Rushmere and that the area forms an important corridor. It states that “opportunities lie in the strengthening of landscape structure, softening of the urban edge and reinforcement and creation of corridors which penetrate the urban area”. It concludes that that the area is “sensitive to development” and “care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town”. These comments will clearly also apply to the open land within the Ipswich boundary. Even more so as the land is nearest the edge of suburban Ipswich and there is substantially less open land within the Ipswich boundary than Suffolk Coastal. We also note that this report was produced before the Ipswich draft CS proposal. Therefore, it does not consider the impacts of building on the open countryside within the Ipswich boundary, which will increase the sensitivity of the Land Northeast of Ipswich IP2 as described in this report. In our view, this land is too important and sensitive to be built on, especially as it will result in the need for an additional primary school, which has additional traffic implications.

2. We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new Town centre homes are likely to have a far lower impact on traffic congestion and air quality than on the outskirts of Ipswich. We believe that there are opportunities to convert some of the existing excess town centre retail property into new homes. This approach should be used instead of building on at the northern end of Humber Doucy Lane and Tuddenham Road, which will add to traffic congestion into the town centre and along Valley/Rd/Colchester Rd etc.

3. Traffic modelling shows that traffic from the development will further increase traffic at junctions that are already over-capacity without any road infrastructure projects proposed to rectify this forecast over-capacity.

4. The allocation of this land for housing is in breach of Policy CS16 regarding the protection and enhancement of green corridors and the CS “Green Rim”.

5. The allocation of this land for housing is in breach of the current CS. POLICY DM8: The Natural Environment POLICY DM10: Green Corridors. It is also counter to the principles of POLICY DM11: Countryside and should remain classified as part of the Green Rim.

6. The allocation of this land for housing is in breach of the current CS in relation to the corresponding Policies and Diagram 3 The Ipswich Core Diagram where it is designated as Green Rim. IBC has not provided enough evidence to justify this change of classification from countryside.

7. The North East Character Study recognises the benefits of this site as “a rural buffer” as open fields/countryside to urban Ipswich. Given the lack of such land in Ipswich, it is too important to be lost.

Regardless, there should be no development of this land until the completion of the IGS. This needs to be made clear in the CS. The Sustainability Appraisal needs to fully assess the implications on building on this site and whether delivering more homes in the town centre instead of retail expansion might be a more sustainable option.

IPSWICH LOCAL PLAN REVIEW 2018 - 2036 INTERIM SUSTAINABILITY APPRAISAL REPORT Strategic Environmental Assessment and Sustainability Appraisal JANUARY 2019

In our opinion it is too early to comment on the Sustainability Appraisal (SA) Report
for several reasons, including:

No SA of IBCs decision not to comply with Sections 6.22 and 6.23 of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments of the IGS proposed developments regarding construction traffic and assessment of the early years of the development.
No SA of IBC’s non-adherence to Government Guidelines for IBC’s Air Quality Action Plan and the lack of a target to reduce air pollution in the AQAP and in the CS itself.
No traffic modelling assessment without TUOC for the IGS development and whether the delivery of the IGS is sustainable.
No sewage infrastructure plan/proposals for the IGS and ISPA and SA of the environmental impacts of delivering new sewage infrastructure required for Ipswich, including emissions and impact of traffic congestion arising from the required construction works.
No air quality modelling/assessment of the CS for road traffic.
No air quality or noise assessment in relation to rail transport. This is a major gap in the evidence base that risks rendering the CS unsound. AQ assessments are required for;
the Ipswich Chord and Freight yard, where diesels regularly sit idling emitting pollution clouds,
additional freight to and from Port of Felixstowe,
and additional freight in relation to the construction of Sizewell C.
The apparent lack of a full appraisal of the impacts on building on land at Humber Doucy Lane in the north east.

An updated SA is required to consider all these issues and consulted upon accordingly for the CS to be properly examined and progressed accordingly. We reserve the right to comment on the SA as it is developed.

Attached documents
Charity_Trustee_Stepping_Stone...pdf (689 KB)
Cook, P

Comment ID 14
Organisation
First Name P
Surname Cook
Agent Organisation
Agent First Name Barbara
Agent Surname Robinson
Comment
Please be advised that land North of Humber Doucy Lane was debated at the Ipswich BC Plan Inquiry in 2016.

SOCS contested claims made by Kesgrave Covenant that they should have the land allocated from Tuddenham Road and along the North of Humber Doucy Lane for housing and set for housing forthwith. This land would include the Ruby Field sites. (See maps of both Suffolk Coastal and Ipswich plans over page)

PLEASE let other affected residents know and question your local Councillors. The following information may help you with the issues.


The CS Plan fails to fully take adequate and comprehensive account of transport, air quality, economy and wastewater issues; specifically note the possibility that the viability of development of the 'Garden Suburb', in combination with all the other cross boundary proposals such as East Coast Waveney may not be sustainably achieved due to the severe impact on air quality, traffic and lack of sewage infrastructure'.

WE SUGGEST THEREFORE THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK NPPF

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health.

The potential to secure a "sustainable future" for the existing local population, future
populations and future generations is an imperative not demonstrated by this plan.

The "Climate Change" agenda is insufficiently addressed. Proposals are contrary to NPPF 10' Meeting the challenge of climate change, flooding and coastal change.

It appears that environmental, social and economic effects of the plan are inadequately and inaccurately assessed against Habitats Regulations Assessments and the Sustainability Appraisals (SAs) "serious adverse effects" have not been properly identified, as required under compliance with the NPPF (Achieving Sustainable Development NPPF 6-17) for either the CS or development and control purposes. This situation is likely to render any planning application almost impossible to determine properly and therefore, we say, render the major IGS planning applications problematic It also potentially renders stakeholder responses to planning applications a problem.

NPPF-11. Conserving and enhancing the natural environment

TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS

The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other authorities such as neighbouring local authorities' The SA does not appear to take account of the cumulative effect of CSs of neighbouring authorities regarding housing, employment and especially transport/traffic with regards to increased air pollution and traffic congestion.

THESE ASPECTS NEED TO BE FULLY ASSESSED IN ORDER FOR THE CS SA TO BE SOUND

1. DRAINAGE, Surface Water Drainage: APPEARS NON-COMPLIANT and may not work.
2. FLOODING LIKELIHOOD may increase at Westerfield.
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11. Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS?
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<tbody>
<tr>
<td>Organisation</td>
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<tr>
<td>First Name</td>
<td>Mr &amp; Mrs J</td>
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<td>Surname</td>
<td>Howe</td>
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<td>Agent Organisation</td>
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<tr>
<td>Comment</td>
<td>I can not support this planning proposal, the reasons being displayed in paperwork provided. I do not agree farm land and green belt land should be used for building.</td>
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<td>Attached documents</td>
<td>Howe_Mr__Mrs_J__Attachment.pdf (179 KB)</td>
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Maddeaux, Miss

Comment ID | 5
---|---
Organisation | 
First Name | 
Surname | Maddeaux
Agent Organisation | 
Agent First Name | 
Agent Surname | 
Comment | Primarily, I feel that this part of the Plan does not meet the legal and procedural requirements because the proposal to develop housing in this area was not included in the First Draft Local Plan. The addition of this area is a significant change, and the Martlesham Parish Council was not sufficiently consulted before publishing the Final Draft Local Plan. Indeed, the Consultation Statement clearly says that this site was 'identified as unavailable in Draft Strategic Housing and Economic Land Availability Assessment'.

Secondly, this proposal Plan does not meet the legal requirements because it does not accord with the Martlesham Neighbourhood Plan, which was adopted following a referendum in July 2018.

In terms of soundness, it has not been positively prepared because it has not been informed by agreement with other authorities, primarily Martlesham Parish Council - as it goes against the Martlesham Neighbourhood Plan. The late inclusion of this proposal raises questions about whether sufficient investigations have taken place. I cannot find this area included in the Habitats Regulations Assessment of the plan.

I do not feel that the proposal is justified, because the First Draft Local Plan made it clear that the main focus of housing growth in the Martlesham area would be the Brightwell Lakes development - suggesting that no further developments of this scale would be asked of this area.

The proposal does not look effective, because it does not look like the planners have made sufficient arrangements to accommodate the increase in traffic that this proposal would create in the Martlesham area. Other parts of the Local Plan indicate that the retail area of Martlesham will continue to be supported and encouraged. Anyone who lives in this area knows that the traffic nightmare induced by the retail area seriously threatens the quality of living in this area - but also that battling through busy shops is
already bad enough for the current residents. An additional 300 homes would put further pressure on the retail area, leading to further inconvenience to existing residents trying to travel around the parish. And then there is the pressure on medical services - the recent incident where the surgery in the Square ran out of the flu jab indicates how over-used local services already are. It suggests this development will be primarily occupied by older people (as opposed to young families), who are more likely to require medical services.

The proposal should be withdrawn until sufficient consultation has taken place with Martlesham Parish Council, and sufficient feasibility studies have been made of the site, taking into account the environmental impact and the infrastructure requirements.
Martlesham Parish Council (Robertson, Susan)

Comment ID 6

Organisation Martlesham Parish Council

First Name Susan

Surname Robertson

Comment Lack of justification for housing development on this site.

Consultation Statement Page 469 said “Suffolk Constabulary highlight that the housing target in the Local Plan may need to be uplifted to reflect the publication of new household projections in September 2018. Once the final amendments to the Planning Practice Guidance have been made any uplift is fully explained and justified in the Local Plan”.

Our response is that this may be so, but changes to government’s standard methodology for establishing housing needs across the district do not of themselves justify further development in this area which would overturn a key assumption in the first draft (policy SCLP 12.17) which specifically said development should be limited to the proposal at Brightwell Lakes.

Also to be taken into consideration is the cumulative adverse impact of development of both the Police and Woodbridge FC club sites (both of which are within the 13km protection zone of European Designated RAMSAR Sites on the River Deben). Local Policy DM27 seeks to support Article 6 (3) of the Habitats Directive which deals with the cumulative effect of plans and projects on the integrity of designated sites.

This is particularly relevant because it was a condition of the inclusion of the Brightwell Lakes site in the 2013 Local Plan. Some of the discussion at the time hinged on delivery of off-site mitigating leisure areas - we are unaware of the status of delivery plans for such facilities.
We are not aware of any mention of this in considering these two new sites.

The policy needs to demonstrate if the above has been taken into consideration.

Our preference is for withdrawal of the policy. At a minimum Martlesham Parish Council would like to be involved in redrafting this policy.
Mayhew, J E

Comment ID
15

Organization

First Name
J E

Surname
Mayhew

Agent Organization

Agent First Name
Barbara

Agent Surname
Robinson

Comment
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SOCS contested claims made by Kesgrave Covenant that they should have the land allocated from Tuddenham Road and along the North of Humber Doucy Lane for housing and set for housing forthwith This land would include the Ruby Field sites. (See maps of both Suffolk Coastal and Ipswich plans over page )

PLEASE let other affected residents know and question your local Councillors The following information may help you with the issues.


The CS Plan fails to fully take adequate and comprehensive account of transport. air quality, economy and wastewater issues; specifically note the possibility that the viability of development of the ‘Garden Suburb’, in combination with all the other cross boundary proposals such as East Coast Waveney may not be sustainably achieved due to the severe impact on air quality, traffic and lack of sewage infrastructure'.

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WE SUGGEST THEREFORE THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK NPPF

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health.

The potential to secure a "sustainable future" for the existing local population, future
Representations in relation to the Habitats Regulations Assessment of the Suffolk Coastal Final Draft Local Plan

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NPPF- 11. Conserving and enhancing the natural environment

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Attached documents
Natural England (jackson, john)

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<tr>
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<td>jackson</td>
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<tr>
<td>Comment</td>
<td>Natural England agrees with the conclusion of the appropriate assessment, that the plan will not result in an adverse effect on Internationally important wildlife sites.</td>
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Noske, Derk

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| Comment | I object to the Core Strategy Review Plan proposal for Land at Humber Doucy Lane, Rushmere St Andrew (SCLP12.24)  

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I suggest therefore the plans are unsound and do not comply with the national planning policy framework (NPPF)  

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9. REMOVAL OF TREES, HEDGEROWS, HABITATS
10. ENCROACHMENT on green spaces and countryside, and effect on residents particularly the area around Tuddenham Lane
Noske, Elaine

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**Pledger, Brenda**

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<tr>
<td>Agent First Name</td>
<td>Barbara</td>
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<td>Agent Surname</td>
<td>Robinson</td>
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**Comment**

Please be advised that land North of Humber Doucy Lane was debated at the Ipswich BC Plan Inquiry in 2016.

SOCS contested claims made by Kesgrave Covenant that they should have the land allocated from Tuddenham Road and along the North of Humber Doucy Lane for housing and set for housing forthwith. This land would include the Ruby Field sites. (See maps of both Suffolk Coastal and Ipswich plans over page.)

PLEASE let other affected residents know and question your local Councillors. The following information may help you with the issues.


The CS Plan fails to fully take adequate and comprehensive account of transport, air quality, economy, and wastewater issues; specifically note the possibility that the viability of development of the ‘Garden Suburb’, in combination with all the other cross-boundary proposals such as East Coast Waveney may not be sustainably achieved due to the severe impact on air quality, traffic and lack of sewage infrastructure.

**WE SUGGEST THEREFORE THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK NPPF**

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health.

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**NPPF-11. Conserving and enhancing the natural environment**

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11. **Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS?**

Do not agree with planning policy.
Robinson, Barbara

Comment ID 4

Organisation

First Name Barbara
Surname Robinson

Agent
Organisation

Agent First Name

Agent Surname

Comment The impacts of new sewage infrastructure that will be required to deliver the CS Preferred Options needs to be included in the HRA. Likewise, the impacts of the required traffic infrastructure identified by the traffic modelling to improve the road network to allow the sustainable delivery of the CS (summarised above) also needs to be included in the HRA. If no such assessments are included in the HRA then it needs to explain why they have been omitted.

Attached documents

Comment ID 12

Organisation

First Name Barbara
Surname Robinson

Agent
Organisation

Agent First Name
THE FOLLOWING ISSUES NEED TO BE FULLY ASSESSED & ADEQUATELY ADDRESSED IN ORDER FOR THE CORE STRATEGY REVIEW TO BE ‘SOUND’.

I SUGGEST THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF)

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**NPPF 10. Meeting the challenge of climate change, flooding and coastal change.**

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11. **Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS**

**The national planning policy framework TESTS of SOUNDNESS- NOT MET**

suggests that a local planning authority should submit a plan for examination which it considers is sound, namely that it is:

**Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

**Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

**Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

**TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS OF THE SCDC & IPSWICH DRAFT**

I suggest this plan fails both Soundness and legal compliance, specifically on Environmental Health IMPACTs from likely congestion and attendant Air Quality and Pollution.

**Ipswich is failing to address air pollution and it’s A Q Action Plan is inadequate. These SCDC proposals will exacerbate this critical problem.**

(SEE ATTACHMENT FOR MAPS)

**General Comment**

As a resident of both Tuddenham, North Ipswich and Westerfield, I am appalled at the cavalier way Suffolk Coastal District Council Planning and Development Control have disregarded SCDC Strategic Planning and their Local Plan Policies over recent years. I have have no confidence in their competence., nor should the Planning Inspector.

SCDC have repeatedly failed their Community Involvement Policies. They consult then disregard and take no account of the public & resident concerns.

Failure to adhere to their CURENT Local Planning Policy means it is a free for all Planning by Appeal process which is totally out of control.
Their dysfunctional decision making and poor communications, even internally, have forced the community to take legal actions in the wider public interest. (see below)

Growing frustration at Suffolk Coastal’s ‘undemocratic’ planning system leads to calls for judicial review” PUBLISHED: 20:38 15 April 2018 | UPDATED: 09:11 16 April 2018’

https://www.eadt.co.uk/news/framlingham-residents-challenge-suffolk-coastal-s-undemocratic-planning-system-1-5477176?fbclid=IwAR2OZbd7jwk6iLOM_wPHuVVqwq3cyk_48Lly-CP5tVQWIy3ykKKNjab7SH0

In effect SCDC have capitulated to landowner developer pressure, abdicating their responsibilities and obligations to their population and that of the Ipswich Policy Area.

Our recent parish council meeting had the same findings;

http://tuddenhamstmartin.onesuffolk.net/assets/Minutes/TPC-Minutes-190129-Unapproved-DRAFT-final.pdf

Policy SCLP 12.24 Land at Humber Doucy Lane

It was agreed to make representations on the basis of both Soundness & Legality –

It does not comply with the Suffolk Coastal District Council Statement of Community Involvements as the Parish Council had not previously been consulted regarding this site (it was not mentioned in First Draft of the Local Plan).
It fails the test of Soundness as it has not been Positively Prepared in that it does not meet the needs of Tuddenham St Martin as evidenced in the Village Review 2016 (communicated to the District Council Planning Dept. in various meetings), and in that development of this site would hasten the encroachment of Ipswich towards Tuddenham.
The Ipswich Borough Council Local Plan Draft had been received recently via email (including details of the proposed development of this site) and the Parish Council would fully discuss this at the next meeting prior to replying by the deadline date of 25th March 2019.

Specific Comments on SCLP12.24

The public notices issued by IBC and SCDC are in the wrong locations for this area and are therefore there is therefore a potential breach of the planning law and Local Plan process.

This area has already gone through due process and is at odds with the adopted approach of organic growth around Local Service Centre’s, and not a propose a large development on this site and in this area.

The Parish of Tuddenham is ‘village’, a NOT a Local Service Centre (LSC) which is deemed necessary and required to take this growth and development. Rushmere village is a LSC but does not have facilities and therefore fails the criteria for a LSC.

The area in question SCLP12.24 is part of the designated Green Rim and Green Corridor for Ipswich under current plan. It should remain so as there is a deficit of Green space in North and East Ipswich historically already identified in IBC Biodiversity and Open Space Policy Document.
This proposal is unsound as it takes no account of the established Biodiversity and Open Space BC Policy.

**Policy CS16 Green Infrastructure, Sport and Recreation**

The proposed allocation of land for housing at the northern end of Humber Doucy Lane and Tuddenham Road is in breach of Policy CS16 e.g. in relation to the protection and enhancement of green corridors.

**Heritage and archeology**

The area in question is of great historic importance with list buildings of Westerfield House and Allen Farm. The hedgerows are ancient and suggested to be thousands of years old. The area borders and overlooks the Fynn Valley County Wildlife site, footpaths and ancient green lane.

These proposals, along with IBC lead to a substantial and unacceptable loss of amenity which is unacceptable. These proposals, along with IBC lead to a substantial and unacceptable adverse impact on the local biodiversity, green infrastructure and local heritage.

**These development proposals by both SCDC and IBC**

will adversely impact on the sensitivity of the Fynn Valley and the need to address light Pollution and ancient heritage.
Post Brexit food security will be an issue with the need to protect “Best and Most Versatile” Grade 2 farming Land.
This area proposal will lead to the coalescence of Westerfield, Tuddenham and Ipswich.

The delays and continuing viability issues of the Ipswich Garden Suburb persist which will impact on this proposal too. Therefore, this land area proposal is both unnecessary and premature.

The road infrastructure is characterised as ‘rat runs’ unclassified roads or narrow roads with passing places.
There is no mention of the Felixstowe Freight line planned increase and the adverse impact this will have on passenger rail services and transport mitigation.

The Plan go against the following Suffolk Coastal District Council Core Strategy and Development Management Development Plan policies;

SP1 Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
SP1A Presumption in Favour of Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
SP16 Sport and Play (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
SP19 Settlement Policy (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
SP29 The Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
Like the North Fringe Protection Group, we also share their concerns, outlined here. We challenge the need for future development after 2031 in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road:

1. The **Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018** Section 4.3 Land Northeast of Ipswich IP2 (Suffolk Coastal) recognises the sensitivity of the open land between the edge of suburban Ipswich and the villages of Westerfield and Rushmere and that the area forms an important corridor of land. It states that “opportunities lie in the strengthening of landscape structure, softening of the urban edge and reinforcement and creation of corridors which penetrate the urban area”. It concludes that the area is “sensitive to development” and “care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town”. These comments will clearly also apply to the open land within the Ipswich boundary. Even more so as the land is nearest the edge of suburban Ipswich and there is substantially less open land within the Ipswich boundary than Suffolk Coastal. We also note that this report was produced before the Ipswich draft CS proposal. Therefore, it does not consider the impacts of building on the open countryside within the Ipswich boundary, which will increase the sensitivity of the Land Northeast of Ipswich IP2 as described in this report. In our view, this land is too important and sensitive to be built on, especially as it will result in the need for an additional primary school, which has additional traffic implications.

2. We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new homes. Town centre homes are likely to have a far lower impact on traffic congestion and air quality than on the outskirts of Ipswich. We believe that there are opportunities to convert some of the existing excess town centre retail property into new homes. This approach should be used instead of building on at the northern end of Humber Doucy Lane and Tuddenham Road, which will add to traffic congestion into the town centre and along Valley/Rd/Colchester Rd etc.

3. Traffic modelling shows that traffic from the development will further increase traffic at junctions that are already over-capacity without any road infrastructure projects proposed to rectify this forecast over-capacity.

4. The allocation of this land for housing is in breach of Policy CS16 regarding the protection and enhancement of green corridors and the CS “Green Rim”.

5. The allocation of this land for housing is in breach of the current CS. POLICY DM8: The Natural Environment POLICY DM10: Green Corridors. It is also counter to the principles of POLICY DM11: Countryside and should remain classified as part of the Green Rim.
6. The allocation of this land for housing is in breach of the current CS in relation to the corresponding Policies and Diagram 3 The Ipswich Core Diagram where it is designated as Green Rim. IBC has not provided enough evidence to justify this change of classification from countryside.

7. The North East Character Study recognises the benefits of this site as “a rural buffer” as open fields/countryside to urban Ipswich. Given the lack of such land in Ipswich, it is too important to be lost.

Regardless, there should be no development of this land until the completion of the IGS. This needs to be made clear in the CS. The Sustainability Appraisal needs to fully assess the implications on building on this site and whether delivering more homes in the town centre instead of retail expansion might be a more sustainable option.

IPSWICH LOCAL PLAN REVIEW 2018 - 2036 INTERIM SUSTAINABILITY APPRAISAL

REPORT Strategic Environmental Assessment and Sustainability Appraisal JANUARY 2019

In our opinion it is too early to comment on the Sustainability Appraisal (SA) Report for several reasons, including:

No SA of IBCs decision not to comply with Sections 6.22 and 6.23 of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments of the IGS proposed developments regarding construction traffic and assessment of the early years of the development.

No SA of IBC’s non-adherence to Government Guidelines for IBC’s Air Quality Action Plan and the lack of a target to reduce air pollution in the AQAP and in the CS itself.

No traffic modelling assessment without TUOC for the IGS development and whether the delivery of the IGS is sustainable.

No sewage infrastructure plan/proposals for the IGS and ISPA and SA of the environmental impacts of delivering new sewage infrastructure required for Ipswich, including emissions and impact of traffic congestion arising from the required construction works.

No air quality modelling/assessment of the CS for road traffic.

No air quality or noise assessment in relation to rail transport. This is a major gap in the evidence base that risks rendering the CS unsound. AQ assessments are required for; the Ipswich Chord and Freight yard, where diesels regularly sit idling emitting pollution clouds, additional freight to and from Port of Felixstowe, and additional freight in relation to the construction of Sizewell C.

· The apparent lack of a full appraisal of the impacts on building on land at Humber Doucy Lane in the north east.

An updated SA is required to consider all these issues and consulted upon accordingly for the CS to be properly examined and progressed accordingly. We reserve the right to comment on the SA as it is developed.
## Save Our Country Spaces (Robinson, B)

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**Agent Organisation**

**Agent First Name**

**Agent Surname**

**Comment**

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11. Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS

The national planning policy framework TESTS of SOUNDNESS suggests that a local planning authority should submit a plan for examination which it considers is sound, namely that it is:

Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS OF THE SCDC & IPSWICH DRAFT
Save Our Country Space, (SOCS) suggest this plan fails both Soundness and legal compliance, specifically on Environmental Health IMPACTs from likely congestion and attendant Air Quality and Pollution.

Ipswich is failing to address air pollution and it’s AQ Action Plan is inadequate. These SCDC proposals will exacerbate this critical problem.

(See map attached)

**General Comment**

As a residents of both Tuddenham, North Ipswich and Westerfield, SOCS are appalled at the cavalier way Suffolk Coastal District Council Planning and Development Control have disregarded SCDC Strategic Planning and their Local Plan Policies over recent years. SOCS have have no confidence in their competence., nor should the Planning Inspector.

SCDC have repeatedly failed their Community Involvement Policies. They consult then disregard and take no account of the public & resident concerns.

Failure to adhere to their CURENT Local Planning Policy means it is a free for all Planning by Appeal process which is totally out of control.

Their dysfunctional decision making and poor communications, even internally, have forced the community to take legal actions in the wider public interest. (see below)

Growing frustration at Suffolk Coastal’s ‘undemocratic’ planning system leads to calls for
Representations in relation to the Habitats Regulations Assessment of the Suffolk Coastal Final Draft Local Plan

PUBLISHED: 20:38 15 April 2018 | UPDATED: 09:11 16 April 2018

https://www.eadt.co.uk/news/framlingham-residents-challenge-suffolk-coastal-s-undemocratic-planning-system-1-5477176?fbclid=IwAR2OZbd7Jwk5LOM_wPHuVVqwq3cyk_48Lyy-CpPstQVWy3yKKNjab7SH0

In effect SCD have capitulated to landowner developer pressure, abdicating their responsibilities and obligations to their population and that of the Ipswich Policy Area.

SOCS are stakeholders and SCDC failed to advise of of this consultation failing the Statement of Community involvement.

Our recent parish council meeting had the same findings;

http://tuddenhamstmartin.onesuffolk.net/assets/Minutes/TPC-Minutes-190129-Unapproved-DRAFT-final.pdf

Policy SCLP 12.24 Land at Humber Doucy Lane

It was agreed to make representations on the basis of both Soundness & Legality –

• It does not comply with the Suffolk Coastal District Council Statement of Community Involvements as the Parish Council had not previously been consulted regarding this site (it was not mentioned in First Draft of the Local Plan).
• It fails the test of Soundness as it has not been Positively Prepared in that it does not meet the needs of Tuddenham St Martin as evidenced in the Village Review 2016 (communicated to the District Council Planning Dept. in various meetings), and in that development of this site would hasten the encroachment of Ipswich towards Tuddenham.
• The Ipswich Borough Council Local Plan Draft had been received recently via email (including details of the proposed development of this site) and the Parish Council would fully discuss this at the next meeting prior to replying by the deadline date of 25th March 2019.

Specific Comments on SCLP12.24

The public notices issued by IBC and SCDC are in the wrong locations for this area and are therefore a potential breach of the planning law and Local Plan process.

This area has already gone through due process and is at odds with the adopted approach of organic growth around Local Service Centre’s, and not a propose a large development on this site and in this area.

The Parish of Tuddenham is ‘village’, a NOT a Local Service Centre (LSC) which is deemed necessary and required to take this growth and development. Rushmere village is a LSC but does not have facilities and therefore fails the criteria for a LSC.

The area in question SCLP12.24 is part of the designated Green Rim and Green Corridor for Ipswich under current plan. It should remain so as there is a deficit of Green space in North and East Ipswich historically already identified in IBC Biodiversity and Open Space Policy Document.

www.eastsuffolk.gov.uk/suffolkcoastallocalplanreview
This proposal is unsound as it takes no account of the established Biodiversity and Open Space BC Policy.

**Policy CS16 Green Infrastructure, Sport and Recreation**

The proposed allocation of land for housing at the northern end of Humber Doucy Lane and Tuddenham Road is in breach of Policy CS16 e.g. in relation to the protection and enhancement of green corridors.

**Heritage and archeology**

The area in question is of great historic importance with list buildings of Westerfield House and Allen Farm. The hedgerows are ancient and suggested to be thousands of years old. The area borders and overlooks the Fynn Valley County Wildlife site, footpaths and ancient green lane.

These proposals, along with IBC lead to a substantial and unacceptable loss of amenity which is unacceptable. These proposals, along with IBC lead to a substantial and unacceptable adverse impact on the local biodiversity, green infrastructure and local heritage.

These development proposals by both SCDC and IBC

- will adversely impact on the sensitivity of the Fynn Valley and the need to address light pollution and ancient heritage.
- Post Brexit food security will be an issue with the need to protect “Best and Most Versatile” Grade 2 farming Land.
- This area proposal will lead to the coalescence of Westerfield, Tuddenham and Ipswich.
- The delays and continuing viability issues of the Ipswich Garden Suburb persist which will impact on this proposal too. Therefore, this land area proposal is both unnecessary and premature.
- The road infrastructure is characterised as ‘rat runs’ unclassified roads or narrow roads with passing places.
- There is no mention of the Felixstowe Freight line planned increase and the adverse impact this will have on passenger rail services and transport mitigation.

The Plan go against the following Suffolk Coastal District Council Core Strategy and Development Management Development Plan policies;

- SP1 Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP1A Presumption in Favour of Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP16 Sport and Play (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP19 Settlement Policy (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- SP29 The Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- DM3 Housing in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
- DM4 Housing in Clusters in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)
Representations in relation to the Habitats Regulations Assessment of the Suffolk Coastal Final Draft Local Plan

Strategy
- and Development Management Policies adopted July 2013
- DM23 Residential Amenity (Suffolk Coastal District Local Plan Core Strategy and Development
- Management Policies adopted July 2013)
- SP15 Landscape and Townscape
- DM21 – Aesthetics

Like the North Fringe Protection Group, we also share their concerns, outlined here.

We challenge the need for future development after 2031 in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road:

1. The Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018 Section 4.3 Land Northeast of Ipswich IP2 (Suffolk Coastal) recognises the sensitivity of the open land between the edge of suburban Ipswich and the villages of Westerfield and Rushmere and that the area forms an important corridor of land. It states that “opportunities lie in the strengthening of landscape structure, softening of the urban edge and reinforcement and creation of corridors which penetrate the urban area”. It concludes that that the area is “sensitive to development” and “care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town”. These comments will clearly also apply to the open land within the Ipswich boundary. Even more so as the land is nearest the edge of suburban Ipswich and there is substantially less open land within the Ipswich boundary than Suffolk Coastal.

We also note that this report was produced before the Ipswich draft CS proposal. Therefore, it does not consider the impacts of building on the open countryside within the Ipswich boundary, which will increase the sensitivity of the Land Northeast of Ipswich IP2 as described in this report. In our view, this land is too important and sensitive to be built on, especially as it will result in the need for an additional primary school, which has additional traffic implications.

2. We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new homes. Town centre homes are likely to have a far lower impact on traffic congestion and air quality than on the outskirts of Ipswich. We believe that there are opportunities to convert some of the existing excess town centre retail property into new homes. This approach should be used instead of building on at the northern end of Humber Doucy Lane and Tuddenham Road, which will add to traffic congestion into the town centre and along Valley/Rd/Colchester Rd etc.

3. Traffic modelling shows that traffic from the development will further increase traffic at junctions that are already over-capacity without any road infrastructure projects proposed to rectify this forecast over-capacity.

4. The allocation of this land for housing is in breach of Policy CS16 regarding the protection and enhancement of green corridors and the CS “Green Rim”.

5. The allocation of this land for housing is in breach of the current CS. POLICY DM8: The Natural Environment POLICY DM10: Green Corridors. It is also counter to the principles of POLICY DM11: Countryside and should remain classified as part of the Green Rim.

6. The allocation of this land for housing is in breach of the current CS in relation to the corresponding Policies and Diagram 3 The Ipswich Core Diagram where it is designated as Green Rim. IBC has not provided enough evidence to justify this change of classification.

www.eastsuffolk.gov.uk/suffolkcoastlocalplanreview
from countryside.

7. The North East Character Study recognises the benefits of this site as “a rural buffer” as open fields/countryside to urban Ipswich. Given the lack of such land in Ipswich, it is too important to be lost.

Regardless, there should be no development of this land until the completion of the IGS. This needs to be made clear in the CS. The Sustainability Appraisal needs to fully assess the implications on building on this site and whether delivering more homes in the town centre instead of retail expansion might be a more sustainable option.

IPSWICH LOCAL PLAN REVIEW 2018 - 2036 INTERIM SUSTAINABILITY APPRAISAL REPORT Strategic Environmental Assessment and Sustainability Appraisal JANUARY 2019

In our opinion it is too early to comment on the Sustainability Appraisal (SA) Report for several reasons, including:

No SA of IBCs decision not to comply with Sections 6.22 and 6.23 of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments of the IGS proposed developments regarding construction traffic and assessment of the early years of the development.

No SA of IBC’s non-adherence to Government Guidelines for IBC’s Air Quality Action Plan and the lack of a target to reduce air pollution in the AQAP and in the CS itself.

No traffic modelling assessment without TUOC for the IGS development and whether the delivery of the IGS is sustainable.

No sewage infrastructure plan/proposals for the IGS and ISPA and SA of the environmental impacts of delivering new sewage infrastructure required for Ipswich, including emissions and impact of traffic congestion arising from the required construction works.

No air quality modelling/assessment of the CS for road traffic.

No air quality or noise assessment in relation to rail transport. This is a major gap in the evidence base that risks rendering the CS unsound. AQ assessments are required for; the Ipswich Chord and Freight yard, where diesels regularly sit idling emitting pollution clouds, additional freight to and from Port of Felixstowe, and additional freight in relation to the construction of Sizewell C

The apparent lack of a full appraisal of the impacts on building on land at Humber Doucy Lane in the north east.

An updated SA is required to consider all these issues and consulted upon accordingly for the CS to be properly examined and progressed accordingly. We reserve the right to comment on the SA as it is developed.

Attached documents

Map_of_Land_at_Humber_Doucy_Lane.pdf (728 KB)
Representations in relation to the Habitats Regulations Assessment of the Suffolk Coastal Final Draft Local Plan

Smith, T M

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<td>Smith</td>
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<td>Agent Organisation</td>
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<td>Agent Surname</td>
<td>Robinson</td>
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Please be advised that land North of Humber Doucy Lane was debated at the Ipswich BC Plan Inquiry in 2016.

SOCS contested claims made by Kesgrave Covenant that they should have the land allocated from Tuddenham Road and along the North of Humber Doucy Lane for housing and set for housing forthwith. This land would include the Ruby Field sites. (See maps of both Suffolk Coastal and Ipswich plans over page.)

PLEASE let other affected residents know and question your local Councillors. The following information may help you with the issues.


The CS Plan fails to fully take adequate and comprehensive account of transport, air quality, economy and wastewater issues; specifically note the possibility that the viability of development of the ‘Garden Suburb’, in combination with all the other cross boundary proposals such as East Coast Waveney may not be sustainably achieved due to the severe impact on air quality, traffic and lack of sewage infrastructure.

WE SUGGEST THEREFORE THE PLANS ARE UNSOUND AND DO NOT COMPLY WITH THE NATIONAL PLANNING POLICY FRAMEWORK NPPF

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health. The potential to secure a “sustainable future” for the existing local population, future
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NPPF-11. Conserving and enhancing the natural environment

TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS

The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other authorities such as neighbouring local authorities' The SA does not appear to take account of the cumulative effect of CSs of neighbouring authorities regarding housing, employment and especially transport/traffic with regards to increased air pollution and traffic congestion.

THESE ASPECTS NEED TO BE FULLY ASSESSED IN ORDER FOR THE CS SA TO BE SOUND

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3. SEWAGE PROPOSALS INADEQUATE & likely to add to existing problems (eg recently at Rushmere)
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10. COUNTRY PARK – DELIVERY APPEARS UNLIKELY UNTIL 2025 or later
11. Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS?

I do not agree with the planning policy and all of the 1 – 11 aspect need to be studied before any decision is reached.

Attached documents
Sward, S D

Comment ID 9

Organisation

First Name S D

Surname Sward

Agent Organisation

Agent First Name

Agent Surname

Comment
I cannot support the proposal for planning on green belt land along Humber Doucy Lane and beyond.

This is prime agricultural land and green belt it will destroy the countryside for all the reasons given in the enclosed paperwork.

This land is the start of the Fyn Valley which is a natural beautiful valley and much loved.

Attached documents Sward_S_D_RC_Attachment.pdf (174 KB)