

SPROUGHTON PARISH COUNCIL

Clerk: Mrs S. Frankis
24 Church Crescent
Sproughton
Ipswich
Suffolk
IP8 3BJ

Telephone: 01473 463852
Email: pc@sproughton.suffolk.gov.uk
Web: www.sproughton.onesuffolk.net

Planning Dept.
Babergh District Council
Corks Lane
Hadleigh
IP7 6SJ

17th September 2015

Dear Sirs

Thank you for giving Sproughton Parish Council the opportunity to comment on this significant and potentially precedent development proposal.

The Parish Council received the application for comment on the 10th August 2015 and has considered the proposals, its details, impacts and opportunities at a number of public Planning Committee meetings, and full Council meetings of the Parish Council on the 19th and 26th August 2015 and on the 2nd September 2015, including a special meeting of the Council on the 3rd September attended by circ. 120 Sproughton residents concerned about the proposals. The following comment and objection is Sproughton Parish Council's assessment and view of the proposed development planning application.

We wish to object to the Wolsey Grange Planning Application B/15/00993 for the following reasons:-

1. Wilcon 1987-1989

On 13th October 1987 a public enquiry by Government Inspector Mr Michael Montague-Smith appointed by the Secretary of State for the Environment Secretary was held at BDC into the appeal by Wilcon homes against the refusal of their planning application to develop Chantry Vale. The following are reasons listed for the refusal:-

- The application concerns the carrying out of development which would result in the loss of agricultural land. The M.A.F.F. (Ministry of Agriculture

fisheries and food) objected on the grounds that the majority of the site is land of high agricultural value.

- S.C.C. as Highway Authority issued directions to the effect that the planning permission must be refused as “Approval of this application would result in a material increase of traffic using existing public roads which do not have sufficient capacity,
- The development would break through a strong existing visual edge to Ipswich into an area of attractive countryside the environment of which would be unacceptably disturbed. In addition, a number of significant views into the area would be seriously and adversely affected.

Those reasons are still valid. Mr Michael Crouch Principle Planning Officer BDC was quoted by the press to say “The village of *Sproughton* would be swamped if the huge development at *Chantry Vale* was allowed to go ahead” He went on to say “ the development would ruin for ever the beautiful, natural approach to the west of Ipswich”. Mr Eric Grant Chair of I.B.C. Planning and Development Committee was quoted as saying “it was an agreed policy to retain open farmland between the town of Ipswich and the village of *Sproughton*”. This is also still valid - Sproughton does not want to become another suburb of Ipswich.

In 1989 Wilcon again attempted to submit a planning application for Chantry Vale. It was again refused and Mr Martin Price area planning officer was quoted in the press as saying “Wilcon’s plans could prove the ‘thin edge of the wedge’ if approval was given”... “Most of the issues which were discussed at the Chantry Vale inquest are relevant to the current application”. However this was an application for a mixed use development of only 129 homes on the same site as the present 2015 planning application.

2. Strategic Housing Land Availability Assessment, 2009

In June 2009 Babergh District Council completed its final report of a Strategic Housing Land Availability Assessment. It ruled out development of a nearby site, SB280, on the other side of the A1071, on the grounds of access constraints. Infrastructure changes have not been substantial since then and the same constraints apply now.

3. Policy CS7: Strategic Site Allocation

Taylor Wimpey are proposing 475 houses. This goes against **Policy CS7: (Strategic Site Allocation - Babergh Ipswich Fringe (Babergh Local Plan 2011 – 2031 Core Strategy and Policies page 45)** which references 'approximately' 350 houses. When the Babergh Local Plan was presented to the Planning Inspector for approval, their ‘Response to matters raised by the Inspector’ dated February 2013 stated at item 2.4 ‘Option 1’ that the land had potential for ‘Up to 350 dwellings’. The Inspectors report ‘**REPORT ON THE EXAMINATION INTO BABERGH LOCAL PLAN 2011-2031, PART 1 –**

CORE STRATEGY, DEVELOPMENT PLAN DOCUMENT' Dated 14th January 2014 at Item 218 approved approximately 350 homes. Since 2007 as BDC policies and documents have evolved there have been references to an Ipswich Fringe development of 350 homes, and for those few aware of this with any understanding or acceptance, the understanding was that under all planning, all policies, and by government approval 350 homes was the limit. 475 houses is a 35% increase on 350 - this is by no means 'approximately 350 houses'. 475 houses is almost equivalent to another Sproughton. It is also of note that the Inspectors report at item 221 considered the increased traffic generated by the site justified a contribution by the developers to improvements to the Copdock Interchange which the present application appears to be contradicting.

Taylor Wimpey own the land on the other side of the A1071 up to Chantry Park, across the Hadleigh down to the A14. It is entirely possible that Taylor Wimpey will apply to build on that land in the future and the 1987 development plan for that area was 1400 houses. This again is against **Policy CS7: Strategic Site Allocation - Babergh Ipswich Fringe** which states *"A Masterplan will be required which should: i) be based upon and designed around a green infrastructure framework providing high quality design, structural landscape planting, and connections to or potential links with existing formal and informal green spaces, wildlife areas, and natural landscape settings and features, particularly the Gipping Valley footpath, Chantry Park and Belstead Brook Park, and ensure a separate identity and avoid creeping coalescence with adjacent settlements;"*

4. Policy CS15: Implementing Sustainable Development in Babergh

High quality agricultural land being used: Could the brown-field Sugar Beet site be used instead. Although primarily designated as a Commercial development site 350 homes would only take up a fraction of the sugar beet site with little impact on its primary allocation and significantly less impact on the environment. The Chantry Vale development therefore goes against **Policy CS15: Implementing Sustainable Development in Babergh** specifically *"vii) protect and enhance biodiversity, prioritise the use of brown-field land for development"*

5. Special Landscape Area (SLA), Policy CR04

Site Designation: The site is defined as a Special Landscape Area (SLA). Development in a SLA is supposed to be minimised at best, and sensitively designed if development is done at all **Policy CR04** states that *"Development proposals in Special Landscape Areas will only be permitted where they:-*

- *maintain or enhance the special landscape qualities of the area, identified in the relevant landscape appraisal; and*

- *are designed and sited so as to harmonise with the landscape setting".* A substantial area of the site South of Poplar Lane is either undesignated by applicant SPC, Sept 2015

or designated for commercial use with no plan that guarantees its development as such. This area is entirely sufficient to provide a residential development of 350 homes and would bring the residents within walking distance of the shops and park and ride facility and place the residential development below the skyline views from Chantry Vale and Chantry Park. That seems far more appropriate to BDC policies. The area North of Poplar Lane would then be available for any future commercial development using low aspect buildings to hide them below the skyline.

6. Site Design/Layout & Historical Context: Policies CS18 & CS19

Site Design: 3 storey flats are proposed around the high bank bordering the A1071 due to the height of the bank these would appear 5 storeys high, hence a significant visual impact – corrupting the skyline. Could the site be redesigned so that taller buildings are at the back of the site or put next to the London Road which is already built-up. 35% of the development should be affordable housing. The first phase consists of 20%. Later phases would have to have more than 35% - is this financially viable for Taylor Wimpey?? How often do developers achieve the 35%?? The 35% requirement is specified in **Policy CS19: Affordable Homes** "*In order to promote inclusive and mixed communities all residential development (Note 1) will be required to provide 35% affordable housing*". There does not seem to be provision for older people - there are no bungalows. This lack of provision goes against **Policy CS18: Mix and Types of Dwellings** "*Residential development that provides for the needs of the District's population, particularly the needs of older people will be supported where such local needs exist, and at a scale appropriate to the size of the development. The mix, type and size of the housing development will be expected to reflect established needs in the Babergh district (see also Policy CS15)*"

Site Layout: Swapping the employment area with the industrial area would help retain a natural boundary to the development reducing the possibility of housing 'jumping' to the other side of the A1071 and down to the A14/Church Lane area, thereby retaining the identity of Sproughton as a village.

Historical Context: The local style of historical buildings appears to have been ignored e.g. Poplar Farmhouse, Springvale Cottages, Red House – the development would 'blend' better if these styles were taken into account. We do not want to see an urbanised development, Chantry Park and Pinewoods may err that way but it is out of character with Sproughton. This could be achieved easily without changing the fabric and efficiency of the buildings by using a range of enhancement/finishes to the outside of the buildings in small groups each in keeping with country styles.

7. Biodiversity, Trees and Landscape, Policy CS15.

7.1 Summary

The developer's surveys appear to be primarily for the avoidance of liability within the site. Local knowledge and casual observation reveals the potential for insects,

bats, plants and wildlife in and adjacent to this (SLA) not investigated or considered. Limited landscape assessments on the impact to the local area (SLA) and trees removed which will reduce the present screening. There is no insect, plant or wildlife survey, the bat survey just considers bats in the retention of 6 trees, ignoring all buildings and a substantial area of woodland, and three Bird surveys apparently failed to spot birds of prey which are hunting there every day. The landscape assessment was inwardly looking and for some reason only considered one view from within the Chantry Vale SLA, where the College is prominent but most of the development is shielded from view by Hadleigh Road and the cottages beside it. It made much of the pylons which are all but invisible from within the vale and completely ignored the raised bank beside the A1071 which will have a significant impact on its visual impact within the Vale. It also failed to take into account trees planned for removal which will be in the sight line of the Holiday Inn from the Vale. These issues are also covered by **Policy CS15: Implementing Sustainable Development in Babergh** specifically "*vii) protect and enhance biodiversity*" as well as **CR04**. It almost appears the TW are going out of their way to reduce the aesthetic value of Chantry Vale so that it becomes easier to develop the other areas of land that they own. An issue BDC recognised in the 1989 application.

7.2 Biodiversity

Generally we welcome the recommendations that ENIMS have made, however there appear to be some shortcomings in the extent and findings of the surveys that cause us some concern and feel all such data/surveys should have Independent verification, preferably by a local organisation with no financial interest in the process.

We obtained details for the site from the **Suffolk Biological Records Centre** to assess the relevance of the desktop surveys referred to in the surveys and were amazed to find that there were only 5 mammals recorded in the area over two decades. The SBRC told us this is typical of Suffolk Farmland due to restricted access to the public. It would not be unusual to have that many sightings in a Suffolk country back garden in a week, or even a day, so clearly this data is inadequate and no indication of what might be present in this Special Landscape Area.

Our concerns led us to speak with a local professional ecologist (Margaret Regnault) who made the following observations.

In addition to the advice from SWT - where I re-iterate:

"there is currently insufficient information available to determine that the proposed development will not have an adverse impact on designated sites or protected and/or UK/Suffolk Priority Species"

Dormice:

According to the report : "Ecological Constraints and Opportunities Assessment"

"There are no records of dormice (*Muscardinus avellanarius*) from within 2km of the

application site"

I believe there is a record of a dormouse nest within 2km at Belstead meadows - next to the A14.

It states:

"It is considered unlikely that dormice are present on-site. In addition, current development proposals include the retention of semi-natural broadleaved woodland and existing field boundaries such as hedgerows. Therefore, it is considered that there is a negligible risk of adverse impacts to dormice."

The removal of scrub habitat would reduce the area suitable for dormice and the threat to dormice would include the increase in predation due to domestic cats and lighting.

Hence there is insufficient information and their conclusion of "Negligible potential for adverse impact." is unjustified without further instigation.

Reptiles:

Looking at the reptile survey this is sub-standard.

According to the JNCC report or the froglife one.

"To establish presence, generally at least seven visits in suitable weather conditions at the appropriate time of year may be required. For detailed surveys to gain some idea of relative population size or to identify key areas, at least 20 visits per season suitable weather are recommended."

Weather conditions ... "air temperature is between 9 and 18 degrees C"

"the most profitable months for surveying tend to be April, May and September"

They undertook 2 visits at 20 degrees and 2 visits at 18 degrees therefore only 4 visits were undertaken at a temperature of under 18 degrees, and only 2 visits in September means this is a suboptimal survey for a presence /absence survey, and definitely insufficient to determine the population size.

The maps in appendix C were insufficient to determine the efficiency of coverage of the area.

Bats:

Whilst a tree inspection was undertaken on 6 trees, all of which had features that may support bats, As bats are very small even using an endoscope it is difficult to determine if they are present as it is not possible to get to all points of a tree. No surveys were undertaken with bat detectors this would confirm if these trees were used by bats and how bats were using the landscape.

No details were seen as to the lighting of this site.

Stag beetles:

These have been recorded within 500m of the site and are a Suffolk Biological Action Plan species. (BAP) - no mention of this species was contained in "Ecological Constraints and Opportunities Assessment"

Margaret Regnault MSc. is a local experienced professional ecologist with over 15 years ecological experience and Natural England: Bat, Great Crested Newt and

SPC, Sept 2015

Page 6 of 25

dormice licences. She has worked for Suffolk Wildlife Trust, Natural England and Ipswich Greenways Countryside project.

7.3 Ecological Constraints and Opportunities Assessment

This report was apparently commissioned as an update to a Phase 1 habitat Assessment completed in 2012 by another company. Although the report lists statutory land designations, and non-statutory Designations it ignores the Special Landscape Designation of the Chantry Vale.

A desktop survey limited to protected species recorded in the last ten years relied only on the SBRC data which in light of the incredibly limited value of this data (as confirmed by its administrator above) is worthless. All the Data available indicates is that the SBRC does not know what is on the site. The site is a complete unknown and requires careful examination to establish what wildlife / biodiversity exists there.

Clearly a one day inspection of the whole site, its borders, hedgerows, tree and buildings and the neighbouring fields cannot be sufficient to identify all the wildlife, this is confirmed for instance by the reptile assessment which concluded there was no evidence of reptiles, backed up by records (We assume the completely inadequate SBRC records) whereas a reptile survey subsequently conducted found grass snakes.

A reliance on the inadequate SBRC records is also evident in the author's assessment of Bats and Dormice. That the author considers it is unlikely that dormice are present on site mainly based on data that indicates no-one really knows what is on the site is extremely worrying. We now understand there are Dormice within 2km and with ready access to the site via the A14 Greenway.

We also note that the report appears to be confined to protected animals. There is an unknown potential for rare plants, insects like Stag Beetles etc. as well as other rare animals and none of these appear to have been considered.

Birds of prey hunt the site daily, clearly indicating an abundance of small animals for their prey, but we have no idea what these are. If this site proceeds without a closer examination, preferably by an independent body, who knows what rarities will be destroyed.

Badger Survey Report: We do not doubt this is accurate though badgers were one of the five sightings listed in the Suffolk Biological Records Centre records in this area.

Reptile Survey Report: We are informed by Suffolk Wildlife Trust that Grass Snakes, as found, do have some protection, but we are more concerned especially in view of the apparent shortcomings of the other surveys completed by ENIMS, that this survey appears to be insufficient.

Breeding Birds Survey Report: This report has been completed on the basis of a limited number of field visits and a desktop study based on information from SBRC. However as above the SBRC data is completely inadequate for this purpose. Also birds of prey can be seen hunting this site daily, they are unmistakable. It is difficult

SPC, Sept 2015

Page 7 of 25

understand how in their site visits the specialists completing these reports failed to sight these birds and again this causes concern about the depth of this survey. We welcome the mitigation recommendations but as the survey has missed what is a common sight we are again concerned that the survey was inadequate.

Bat Tree Inspection Report: This is not a bat survey, and we are aware that there are bats in the area. This report examines six mature trees likely to support bat roosts. It is not clear if other trees were dismissed as unsuitable or whether the survey just focused on these trees for some other reason. The survey does not appear to look for evidence of types of bat in the area and there appears to have been no consultation with local independent groups.

The survey makes reference to the Bat Conservation Trust (BTC) guidance for Bat surveys, but appears to be focused purely on the implications to the trees of the presence of bats, rather than the implication on the bats. There appears to have been no examination of local buildings to identify bat roosts / colonies, their flight paths or foraging areas as stated in the BTC guidance. It is illegal to deliberately disturb in a way that would affect their local distribution or abundance, or affect their ability to survive, breed or rear young. The survey appears to be insufficient and inappropriate.

General

The absence of Bird of Prey sightings by the survey was surprising as Birds of Prey can be seen hunting at the site daily, which also indicates the presence of an abundance of wildlife for them to hunt. Policy CS7 vii) requires a biodiversity plan, however in the absence of a detailed wildlife assessment and so much doubt over what is on the site how can any plan proposed be considered as appropriate.

We are also concerned that there appears to have been no consideration given to the effects of pets on the site once the homes are occupied. For the reasons above no one appears to know what wildlife is actually there, however if only one in seven of 350 homes has a cat that would represent 50 predatory cats hunting what will be an already strained habitat for any wildlife that does remain and this appears to be a factor apparently overlooked.

In relation to wildlife we are concerned that other relevant issues like beetles, insects, mammals, flora, fauna etc do not appear to have been researched. This farmland is a plateau at the top of a green valley leading into the Gipping River Valley. It is quite possible that the presence of the A1071 / A14 and London Road has effectively cut off this area for some species but equally it was part of a rich valley, farmed for decades if not centuries, with the potential to support and protect any manner of nature that may still remain within the hedgerows, field borders and woodland. It is also connected to other sites by the A14 embankment greenway.

BDC Policy CR04 requires and CS15 further enforces BDC policies to maintain or enhance SLA's, landscape, wildlife and biodiversity, however without surveys anything significant is likely to be destroyed in the site preparation before any building even takes place.

We would ask that planning approval was rejected until proper wildlife surveys are completed, considered and independently verified.

As an associated issue:

7.4 Agricultural Land

We feel that this planning application should be considered with great consideration. Taylor Wimpey have clearly been working towards this for several years and as they own the remainder of the Chantry Vale have designs on that as well.

However the Chantry Vale is not just an SLA, this site is also listed as some of the best and most versatile Agricultural Land in the area. 112 of the NPPF states: *'Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.'* One must question the wisdom of destroying the best farmland in that area when the Sugar Beet Factory could easily accommodate a mixed development including 350 homes on a fraction of its site.

7.5 Landscape General Comments

This appears to be a very inward looking survey, it focuses mainly on the visual aspects and landscaping within the development. The Special Landscape Area extends to the North of this site and down the Chantry Valley to the Gipping Valley but only two of the fourteen viewpoints considered are within the SLA. One close to the London Road which it mitigates against an urban background. The second in Church lane in a position where the College is very evident but the development is partially obscured by trees and cottages on Hadleigh Road.

BDC Policy CR04 relating to SLA's, upon which this site is proposed, require that they maintain or enhance the Special Landscape qualities of the area, and this survey marginalises the impact on the remaining area of this SLA which in relation to CR04 should be its main focus.

Externally it compares the developments proximity to the nearby Pinewoods, Tesco's, Park and Ride, College and Holiday Inn etc and proposes it to be a logical progression of the urbanisation.

It does not recognise that the present border of the SLA with urbanisation is predominantly the wide buffer of the dual carriageway London Road, with wide grass central reservations, boarders, extensive hedgerows and trees.

View point 8 is close to the London Road however it does not recognise how that road creates a wide and a visual buffer to the urbanisation. Most of the housing the other side of the London Road are low lying bungalows, low two story houses or low two story flat roofed commercial buildings. All of these buildings are about a hundred yards back from the edge of the SLA the other side of a wide dual carriageway lined both sides with trees and hedgerows.

The main building that stands out is the College which is a three storey flat roofed building well over a hundred meters back the other side of London Road. This is an eyesore from

Chantry vale and could be improved with some visual softening, perhaps pastel green banding etc. and more trees.

The Holiday Inn is two stories high but with a higher roof and about a hundred meters or so back from the A1071 behind several trees, grass lawns and set down at a low level, but is also visible but mainly its roofline.

The Landscape report also appears to have completely overlooked the raised bank along the side of the A1071. This is about 15 foot high at the points TW propose to put in three storey flats and although they will be set back about thirty meters, nothing like the hundred meters the Holiday Inn is set back so their negative visual impact will be significant. They will effectively be as high a 5 storey block of flat plus their pitched roofs and therefore a dramatic corruption of the skyline from within Chantry Vale.

Therefore from view point 8 at present there is a negligible residential impact visually on the Vale from urbanisation and only limited impact from commercial/education premises. But this is considered adequate justification to breach the natural buffer of the London Road with residential development which will have a greater visual impact than the present situation.

Viewpoint 7 in Chantry Vale is along Church Lane at a point where the development is partially obscured by the cottages and trees on Hadleigh Road but where the Holiday Inn and College stand-out quite well. A visual assessment from the other side of the Valley from Chantry Park or any number of other areas would have provided a view of the development from the SLA and better demonstrate its adverse impact.

Basically the planners allowed the college to be built as a visual carbuncle from the Chantry Vale, so now its OK to make it much worse!! This is completely in contradiction to BDC Policy CR04 which requires development in or near SLA's to maintain or enhance the landscape. Something the Landscape Report appears to ignore.

A final point to consider. A major issue is that the development should be adequately screened by trees from view from within the remaining SLA of Chantry Vale. This has been proposed but we feel completely inadequately for the scale and design of the proposed development. However even if adequate screening by trees was achieved the fact is that this screening will be blocking views of the Chantry Vale from the homes on the A1071 border. For those occupiers there is a visual and financial incentive to have that view, and the only way of achieving that would be to get rid of those trees!

Children climb trees, and unfortunately some people are greedy and care nothing for conservation, either by accident or design these trees could easily be destroyed and we feel that any approval should include a commitment extending over at least 25 years to maintain, protect and where necessary replace trees to maintain the visual screening of the site from Chantry Vale.

7.6 Landscape Report

The site is clearly within a special landscape area as designated by BDC, having said that BDC have chosen to designate it as a strategic development area apparently providing Taylor Wimpey with a fait accompli for development. As Taylor Wimpey own the rest of Chantry Vale a logical finance based assumption is that they would benefit by creating an environment that would support development into the rest of the valley. What is blatantly obvious is that this is chipping at the edges of the Special

Landscape Area. As BDC said in 1989 when the previous and very similar development was rejected, it is “the thin of the wedge into development of the Chantry Vale”.

If Taylor Wimpey is allowed to destroy the visual amenity from the adjacent landscape this will corrupt the beauty that exists now providing a crack for that wedge of development to drive on into this special landscape area and destroy it all. Not only will that lead to creeping coalescence, but creeping urbanisation and a progressive destruction of a beautiful valley. Chantry Vale is worth preserving for the appreciation of the future residents of Ipswich.

5.5: Objective 6, Conserve and enhance

What is also blatantly obvious is that the developer is primarily interested in what the site looks like for the people who will live in it. Whereas for the people who enjoy and use this area now the main concern is not what it looks like within, but what it does to what is already there and what will remain of that. We would recommend that more consideration is given both by Taylor Wimpey and their consultants to how they will conserve or enhance the Special landscape adjacent to the site as required by policy CR04.

5.6: Re CS7. The Strategic Site allocation.

BDC make particular reference to the Gipping Valley footpath, Chantry Park and Belstead Brook Park with no mention of the remaining Chantry Vale itself in the middle? I also fail to see how developing this area in any way can be avoiding creeping coalescence, it just brings the urbanisation of Ipswich a massive step closer to Sproughton which we strongly object to.

5.7: Re CS7.

As far as Assimilation is concerned this appears to be more of a blunt integration into the landscape to the visual benefit of the development perhaps, but to the detriment of the adjacent landscape. We would recommend this application was not accepted without assurances that the development will be suitably screened so as not to reduce the visual amenity of views from within the Chantry Vale.

6.2: Topography

The author identifies the site as uncomplicated and therefore of low value. However this report again only appears to be ‘looking inwards’ what appears to be completely overlooked is that this farmland is a plateau at the top of rolling hills and a complicated valley. The site itself may be uninteresting but it impacts on landscape of significant visual value. This report is failing, or avoiding, addressing the impact it will have on the area.

6.21: Summary

Again this report only looks inwards, it fails to consider the sites impact on its surroundings, if these are taken into consideration the suggested overall effect of a Minor long term benefit is absurd, buildings with a visual impact equivalent of 5 storey flats will have a major negative long term impact on the surrounding SLA .

7.13: The pylons mentioned are only an influence within the development they are virtually invisible from within the Chantry Vale

7.16: Tranquillity; this is a dark valley with the Hadleigh road sunken below hedgerows, public rights of way and several unofficial but commonly used foot routes bisecting it.

7.17: The edge of the development site is busy, not the SLA itself, everything has to have an edge it is there to define the point where something like urbanisation should stop. Again this is an example of the inwardly looking bias of this report.

7.18: Author identifies nearby urbanising influences to support development, however if these are a reason to develop, more urbanisation will just become a reason to develop even further. So an edge to urbanisation is equally a reason to halt urbanisation.

7.19: hedgerows will not hide this development

7.21: By definition if it lies on the edge of a designated landscape area some sides will be adjacent to areas that are not. Such a designation is intended to halt, or at least carefully regulate any development at that line, it is not an excuse to pick away at the edges. It is also not heavily influenced by the adjacent (NOT SURROUNDING) urban form. The Park and ride is in effect an open area completely invisible from Chantry Vale, the Holiday Inn is low lying set a hundred meters back behind trees and lawns and all the remaining URBAN areas are separated by the wide green bordered London road .

7.22; 7.23; This site represents a jump of urbanisation over the dividing line of a wide dual carriageway which is sympathetic to the landscape with a wide green central reservation and wide green side shoulders bordered by hedgerows and trees. This represented a natural end to the urban area and this development will be breaching this barrier.

Leaving Ipswich along the London Road the left (East side) is predominantly urban though mainly bungalows separated by hedgerows and a wide green shoulder. To the right (west) there is the Chantry Park followed by a row of large quite rural houses mainly set well back and surrounded by trees, then open views into Suffolk and down the Chantry Vale. The Holiday Inn is set down and low lying surrounded by a significant area of lawns and trees and then there are hedgerows partially screening the farmland now destined for development. The London Road is a natural boarder between Urbanisation and Rural landscape and rather than being a natural extension of urbanisation this development represents a significant step that crosses that boundary into protected areas and should be considered with great care.

7.24: Another way of saying the extension of the Ipswich Urbanisation into Sproughton.. or creeping Coalescence. It cannot be one without being the other. It is also an extension of urbanisation into the Special Landscape area and some of the best farm land in Suffolk (DEFRA).

7.25: 7.27: We now see that the site proposes three story houses on its Northern boundary. This was something we specifically asked Taylor Wimpey to avoid. We felt SPC, Sept 2015

there was a need within the mixed designs of the site to provide bungalows for the retired who do not want to live in ground floor flats, and that bungalows would be best positioned along the A1071 border to reduce the visual impact of the site into the Vale. The Land along this Northern edge is significantly raised by a bank. Trees on that bank only offer a low aspect of screening due to the height of the bank, and the height of the bank projects any development along the Northern edge into the skyline. Only new, and therefore young and fairly low trees planted on the top of the bank will have any hope of real screening effect and with three story houses that may take several decades to achieve.

7.28: We are not sure 0.7% has any relevance, is this 0.7% of all the Special landscape areas throughout Suffolk, or 0.7% of the areas that are joined to this development. It certainly is not 0.7% of the SLA contained within the A14 commonly known as Chantry Vale of which this site is a part - that would be something closer to 30%. In relation to Chantry Vale which Taylor Wimpey own, this development will have a significant visual impact if three story houses are built along the substantially raised Northern edge of the site.

7.29: 7.30: We agree there would be a moderate effect on the surrounding landscape, but that represents significant implications in that the moderate effect would reduce the value of the remaining Special Landscape area within Chantry Vale and provide Taylor Wimpey with more justification to develop the rest of the Chantry Vale. In 1989 BDC viewed an almost identical planning application as the thin edge of the wedge into development of the Chantry Vale and we don't see any difference now.

8.8: Red House and Chantry Vale, the analysis appears to ignore the raised bank of around 15 feet along the border of the A1071, hedgerows and trees in existence tend to be growing on the bank side and due to the height of the bank only a small proportion extends above the ground level at the top. This can be seen by comparing the bank to the lampposts of the A1071. These houses will be projecting well above the existing tree line. We asked Taylor Wimpey to consider bungalows and low houses along the Northern side so as not to spoil the visual amenity of the Chantry Vale. This was partly as we felt there was a need for bungalows for retired purchasers who wanted a home not a ground floor flat. However Taylor Wimpey have chosen to place three story buildings along this side which appears to be a deliberate attempt to corrupt the visual significance of remaining Chantry Vale.

8.20: From within the Chantry Vale, with the exception of Suffolk One which is a blot on the landscape, the 'Surrounding Urban Form' is all but invisible, so the Visual urban effects of this development will be a significant deterioration.

8.125: Author accepts here that there would be major effects from views in close proximity and rather unsurprisingly this reduces with distance. However this is at the head of Chantry Vale so its effects, although reducing with distance corrupt the visual amenity of this valley.

8.126: Again the author accepts the development would bring about notable visual change but has the opinion that its effect would be small against the Urban Context.

However this can only be the case where that notable change is viewed from an area already blighted by the urban background. Chantry Vale is for the most part unaffected by the Urban background the author relates to so this argument does not stand up. The proposed development with three story houses built on the North side atop the already significantly raised bank would have a significant effect. With the raised land these buildings would be equivalent in height of 5 story blocks of flats with pitched roofs atop that. By comparison the Holiday Inn is two story set in lower land and surrounded by significant landscaping and even the College which is three storeys high and the main carbuncle to the skyline is set back over a hundred meters. The London Road is a natural boarder to the Special Landscape Area, it is wide with significant Green borders, hedgerows and mature trees creating a boulevard effect for much of it. If the A1071 was treated similarly, with a wide dual carriageway with trees either side and down the central reservation it might create a suitable new natural boarder, but the development as it stands with high buildings to the North side is just a threatening carbuncle to the Special Landscape beyond.

9.3/ 9.5/ 9.6: see 8.126 above

10.2: As in 7.21 above, the site is surrounded, but not as inferred by an even mix of urban and rural land. It is in effect a triangle of which the two thirds is bordered by recessed roads with adjacent fields lying in the Special Landscape area. Only the third eastern side faces urbanisation, and predominantly this is either the other side of a wide dual carriageway with wide green borders, trees and hedgerows, or at significantly lower levels therefore having minimal visual impact on the site. This dual carriageway represents the demarcation of the Special Landscape area from the Urban sprawl so the incursion of this development across the Dual Carriageway represents a significant break down of the natural boarder. For this reason the Northern edge of the development needs significant consideration and attention to restore a natural boarder with the Special Landscape area beyond.

10.4 /10.5/ 10.6: Again as above

10.7/10.8/10.9: As in 8.126 above the application proposes building 3 storey flats along the A1071 boundary. The land in this area is raised by a very high bank which will in effect take the height of these flats up the equivalent of 5 story flats in relation to the road and Special Landscape area beyond. Rather than being hidden behind the much lower lying trees on the bank these buildings will stand out like sore thumbs on the skyline from within Chantry Vale and therefore corrupt the visual amenity of this pretty valley.

10.10: Clearly we disagree with this statement as it relies on conclusions the author has made over and over that appear to ignore the natural boarder of the London Road and more especially the raised land above the bank along the A1071 and three story flats proposed for the northern edge of the development.

7.7 Arboricultural Survey & Tree Protection Plan

This is a detailed assessment of the trees in the area, our only question about the survey is that we find it incredible that in the whole of the site, which has been

managed farmland for decades if not centuries, only three trees are identified with a lifespan over 40 years! We cannot really believe that left alone there would only be three trees left in 40 years.

Our main concern here is not the survey but what the planners have told them they want to do. They intend to remove several trees at the junction of Poplar Lane and the A1071, these are smaller trees but they are in the sight line between The Holiday Inn and Chantry Vale, generally towards Red House/Church Lane, so would have helped to screen the Holiday Inn from the Valley. If they are not to be replaced with new larger (and therefore significant trees for planting) trees this would be a further corruption of the visual aspect of the skyline from within the SLA.

The other concern is that if as suggested most of the present trees will not survive 40 years, then what trees will remain to screen the skyline views from within Chantry Vale from the development. As pointed out in the landscape survey assessment, what does not appear to have been considered is that the Northern border of the development along the A1071 will also be elevated by a 15 foot high bank. Without large mature trees along this border the houses will stand out like a sore thumb.

8. Community Involvement

Apparently Taylor Wimpey acquired this site and the other land in Chantry Vale around 2007 and they must have done so with a purpose. Also BDC first mentions in documents a development on the Ipswich Fringe of 350 homes also in 2007. A reasonable deduction is that both Taylor Wimpey and BDC Planning have been considering and making tentative plans for this site for nearly a decade.

The Community Involvement Document states that the initial plans for this site have been in the public domain since 2009.

In truth what has been in the public domain has been lengthy documents usually peppered with links to other lengthy reference documents on BDC's website. These documents are difficult to find on the site even if you have some idea what you need to look for, with all the links etc they can amount to hundreds or even thousands of pages, and often the only part of any concern to an individual may be one page within all that.

It may well be that BDC Planning Policy web pages may be interesting to Planners and Developers, but the remainder of the public have lives with many more pressing demands and unless they are informed there is a specific issue concerning them something like this will never even come to their notice.

That even applies to Parish Councillors and some who do take an interest in planning. Parish Councillors are a voluntary role and most have day jobs and lives that restrict the time they can devote to their role. Consultations relating to the new Local Plan and Core Strategy may well have included the designating of this area as a Strategic Site, but it was not the focus of those consultations and few would have

had the time to review all the documents. For the most part by the time any Parish Councillors were aware of the Site Designation they were told it is a Strategic Site and therefore will go ahead.

It has been an observation that responses to BDC consultations have amounted to minute fractions of a percentage point of the local population. This is not due to lack of concern, it is due to lack of notification. In this case no one was told specifically about this site designation, it was left for people to search for something they didn't know they had to find.

To Taylor Wimpey's credit when they needed to start a consultation process they posted leaflets to the local community advising them, and for most this was the first they knew about the plans. However by then Taylor Wimpey had inherited a Fait Accompli as they were told it is a Strategic Site in the advanced stages of negotiations and will go ahead.

So it is unreasonable to say this has been in the public domain since 2009 and in reality most of the local population is only just getting to grips with this when Taylor Wimpey and BDC Planning have been working on it for more like 8 years.

The consequence is that the public response is only now developing, people are still talking, developing views, and discovering new issues daily. Faced with about 90 documents in the planning application people are still reading and trying to understand such a mammoth issue. The responses listed by Taylor Wimpey will as a consequence appear muddled but we would ask BDC to consider them carefully as few people have had time to consider this application properly and those that have may not have had time to refine their responses.

Another issue of concern is the letter of response in the second Community Involvement document from 'Design Network' South and East Panel. Who appear to know something we are not being told!

Quote '**We would like to see particular attention given to the crossing of the A1071 so that the adjacent development sites can fuse together**'.

There is no adjacent site, that may be something Taylor Wimpey would like as they own that land, but any development the north side of the A1071 would destroy the visual amenity of the Chantry Vale and would meet with significant opposition.

Quote 'We sense the site could accommodate a higher density of housing than the indicative design suggests. It will however be necessary to show practical matters are to be addressed, such as overall block structure, parking, and the disposition of fronts and backs. The edges of the site are not especially sensitive, so perhaps there could be higher density at the perimeter, especially along the A1071 and at the corner adjacent to the Holiday Inn'

Again what has this design organisation been told? The perimeter with the A1071 is the most sensitive issue of the development on almost all issues, i.e. landscape, Views and preservation of SLA, Trees, Biodiversity, Building design, Development Layout, Transport, Traffic...

9. Effect on Infrastructure - Particularly Traffic.

TW claim that their improvements will mitigate the increased volumes from Wolsey Grange but have been unwilling to explain how they reached that conclusion. Our objections relating to traffic are as follows:-

A1 Adverse impact on the amenity in Sroughton Village and the level of service provided by the surrounding transport network.

A2 Deficiencies in the assessment of transport impacts

- exclusion of traffic generated from committed and future developments
- employment sensitivity tests - transport network performance not tested
- irrational claim that development impact is diminished by growth impact
- incredible performance predicted for the Wild Man junction
- route apportionment for trip distribution belies observations and under estimates impacts
- Inadequacy of the transport infrastructure to support the proposed development.

9.1 Exclusion of traffic generated from committed & future developments

The Transport Assessment in 8.1.1 claims robustness is assured when developments in the locality of the site are considered and incorporated into the impact assessment.

But this is to ignore the cumulative impact in locations where other committed and planned future developments also have impact. For example, the permitted Great Blakenham Housing, Snoasis and Tomato Greenhouse developments also each require the Beagle and Wild man Junctions on the B1113 through Sroughton Village to accommodate additional traffic flows individually generated by each particular development. An assessment of the overall cumulative impact at a particular location can only be robust if the total impact from all the individual developments affecting that location are taken into account. As it stands, the Transport Assessment under-estimates the residual cumulative impacts and their severity.

For completeness the Transport Assessment ought also to take into consideration the traffic anticipated to be generated from land use identified in adopted LDF plans. For example, by including the traffic from planned potential developments such as the Harris Way industrial estate and the Sroughton sugar beet site.

9.2 Employment sensitivity tests - transport network performance not tested

In Para 10.3.4 the transport assessment says no junctions (other than the new access to the A1214) are proposed to be tested with the employment sensitivity test. Then in Para 10.3.5 the transport assessment says to provide a comprehensive assessment the junctions have been capacity tested. To be clear, the transport assessment only tests the employment sensitivity of one junction on the transport network. No

reason as to why other particular junctions should not be tested for employment sensitivity is given. Nor is it explained why the assessment should be described as comprehensive when no other junctions are tested with employment sensitivity tests.

Table 10-2 describes the anticipated impact of the development and the employment sensitivity tests in terms of volume increases in traffic flow. Any increase in traffic flow can only be accommodated where there is spare capacity available. The results of operational assessments (Table 10-29) shows that 11 of the 13 junctions have insufficient spare capacity to accommodate predicted traffic flows generated by the development. That's without taking sensitivity to employment traffic generated by the planned development to into account. In these circumstances, small increases in traffic flow can have large impacts on the network performance.

Given such a widespread lack of spare capacity in the network surrounding the proposed development it is essential that all affected junctions are tested for employment sensitivity. Only then can an informed planning decision can be made.

9.3 Irrational claim that development impact is diminished by growth impact

The Transport Assessment in 10.12.7 concludes that, compared to the impact of predicted traffic growth between 2015 and 2025, the impact of the development traffic will be insignificant. Table 10-19 shows that the impact of predicted traffic growth between 2015 and 2025 to be a MMQ of 30 vehicles, and Table 10-20 shows that the impact of the growth plus the development traffic to be a MMQ of 44 vehicles. Thus the impact of the development traffic is to increase the MMQ by 14 vehicles. So the conclusion in the Transport Assessment is dependent on a value judgement that if the impact of the development traffic is less than half the impact of predicted growth traffic, the impact of the development traffic will be insignificant.

The Transport Assessment does not disclose its sources for considering the impact of the development traffic to be dependent upon the impact of predicted traffic growth, nor does it disclose its sources of the value judgement for the ratio threshold used.

In Table 10-29 item# 9 the summary of assessment expects limited development impact on the junction. In this case the development impact is to increase the MMQ by 14 vehicles. Whilst the development impact may be limited to an increase in the MMQ by 14 vehicles, it tells us nothing about the severity of the residual cumulative impact. The severity of the impact is dependent upon the ability of the transport network to give an acceptable level of service. The impact becomes severe when network elements operate with a ratio of inflow to capacity (RFC) greater than 85%. In this case the RFC is 117% for the DN scenario, and 131% for the DS scenario. Vehicles arrive more frequently than they can be cleared causing queues to grow.

The statements made in the transport assessment imply that because the growth in traffic is high, the impact from development traffic less severe. Using such a basis for impact assessment is irrational. Both growth traffic and development traffic add to the impact. The impacts from growth and development are cumulative. The impact of the development traffic is felt by all users of the network. A growth in traffic means that there will be more users to be impacted by an addition of development traffic. The development impact is increased by an increase in growth impact; not diminished.

9.4 Incredible performance predicted for the Wild Man junction (Jn 9).

In 4.4.17 it is stated that queue lengths were recorded during the manual counts at all surveyed junctions. However, in Table 4-3 no queue length survey result appears for Junction 9.

In Table 10-19 the assessment for the B1113 northbound approaching the junction (Stream CD-A) shows a MMQ of less than 4 during the AM peak period in 2014.

The picture below is of Sproughton High Street at the site of the automatic traffic counter. It was taken on 28-1-15, the last day of the automatic traffic count, at 8:18 AM. It shows a queue approaching the junction of about 15 vehicles, a queue which may be even longer because it extends out of sight.



Such a difference in queue length between what can be seen in the picture and the values calculated from the automated traffic count brings the credibility of the assessment into doubt. In such circumstances the TRL PICADY knowledge base suggests checking whether the demand flows put into the model are accurate, and whether local circumstances have been properly taken into account in applying the site specific capacity correction.

It is evident from the picture that a two tube counter was used here to count two way flows on this single carriageway. User guidance for such equipment warns that this configuration can operate reliably only where traffic is free flowing (>10 MPH) and when located away from places where vehicles likely to queue or stop. The arrangement deployed here could therefore be one source of error. Any error

present in the 2014 assessment will also have been propagated into the 2025 assessments.

9.5 Route apportionment for trip distribution belies observations and under estimates impacts

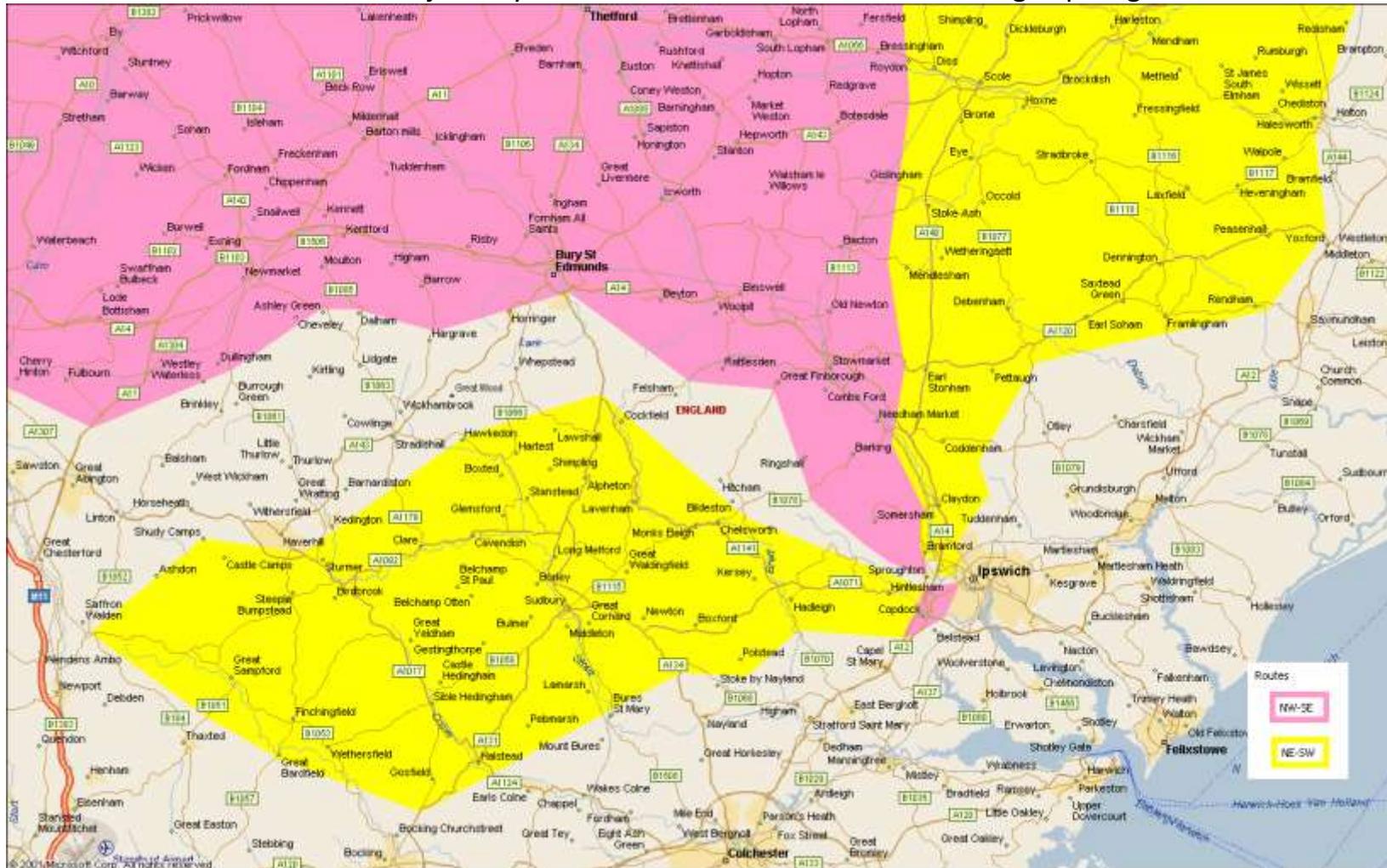
The Transport Assessment in Technical Note 1 states it was possible to identify the most potential travel routes for the residential traffic distribution, and the most used commuting routes for employment traffic. But the transport assessment does not explain the routing adopted and seems not to take into consideration the fact that the route through Sroughton Village along the B1113 is the shortest for journeys between the site and locations NW of the site.

As regards the employment traffic distribution, the transport assessment makes an assumption that the A14 N traffic could potentially use the Copdock and Sroughton interchanges on a 50/50 distribution between the two route choices (Para 9.2.5) or indifferently (Para 9.4.5). It is not explained why the assumption should be that half the A14 N traffic would choose the longer route with more junctions and even greater congestion delays.

To make clear the areas of shortest journey times for routes which connect through Sroughton village a map is provided overleaf. For robustness, the assessment for the permitted SnOasis development assumed that all movements to and from the SW of Ipswich would route on the B1113 through Sroughton Village to and from Claydon rather than using the A14. And as a practical check, using the Tuffnell big green parcel machines as tell tales, it is obvious that the preferred route to and from the NW is through Sroughton Village along the B1113.

By assuming that the route through Sroughton Village only takes a fraction of the traffic routing to and from the NW, the assessment underestimates the impact upon this part of the transport network.

Areas of shortest journey times for routes which connect through Sproughton



9.6 Inadequacy of the transport infrastructure to support the proposed development

The Transport Assessment Table 10-29 shows the results of operational assessments on 13 junctions where spare capacity is needed to accommodate predicted traffic flows generated by the development. It can be seen that if the development were to be permitted then, whatever the scenario DM or DS, 11 of the 13 junctions will operate with RFC/DoS greater than 85%.

In accordance with TA 23/81, elements of the road network are designed to give an acceptable level of service with inflows of up to 85% of maximum capacity. No transport authority has ruled that a reasonable level of service would be provided by its network were it to operate with a ratio of inflow to capacity greater than 85%.

The transport assessment shows that the transport network would not provide a reasonable level of service; even with the proposed transport schemes in place. For reference about what can be done in these circumstances the following is available.

Transport Appraisal in the Context of Dependent Development

January 2014

Department for Transport

Transport Analysis Guidance (TAG)

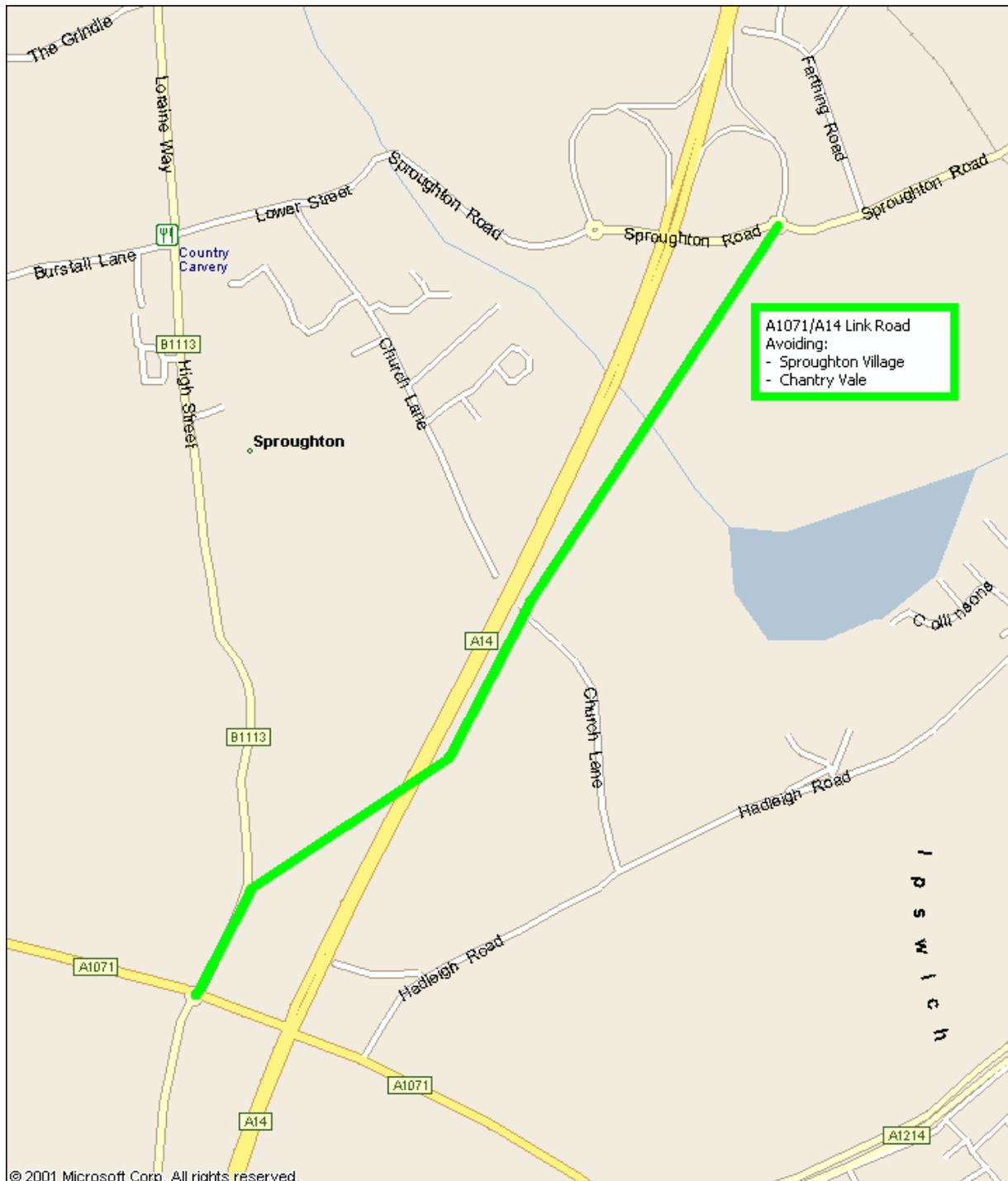
2.2.1 “**Dependent development**” for housing is defined as follows:

New housing is dependent on the provision of some form of transport scheme if, with the new housing, but in the absence of any transport scheme, the transport network would not provide a “**reasonable level of service**” to existing and/or new users.

The transport assessment in 10.20.5 says the overall infrastructure measures identified within this assessment will contribute positively to local transport conditions. But a comparison of the maximum RFC/DoS for the DM and DS scenarios assessed in Table 10-29 shows that the proposed infrastructure measures contribute positively to conditions at only 3 (junctions 3,4,5) of the 13 junctions assessed. There are 8 junctions (junctions 1, 2, 6, 7, 9, 11, 12, 13) where the overall infrastructure measures contribute negatively to local transport conditions. The positive contributions of the proposed transport scheme are less than its negative contributions.

It seems to this Council that capacity will have to be added to the network in order that a reasonable level of service can be provided. One idea we have is the provision of a new road to link the Beagle Roundabout (A1071) with the Sugar Beet Roundabout (A14) as shown overleaf. We suggest ideas are tested for their value in freeing capacity in the network sufficient to accommodate growth where called for in the Babergh LDF.

Suggestion for a new Sproughton relief road to link the A1071 with the A14



Benefits

- | | |
|--|---|
| <ul style="list-style-type: none">◦ Relief for congestion in Sproughton◦ Capacity for growth in traffic volume◦ Relief for Qs on A1071 towards A1214 | <ul style="list-style-type: none">◦ Capacity for Development- former Cement Works at Gt Blakenham- former Sugar Beet site at Sproughton |
|--|---|

◦ Shorter route to A14 N for HGV traffic

- new sites adjacent A1214 at Copdock Mill

10. Health Services

The nearest surgeries are Pinewood & Hawthorn Drive (until recently unaware of the proposed development). As of 06Sep15 there had been no correspondence from the NHS regarding this development, however 'NHS CCG' has been listed as a consulted organisation. Can these surgeries cope with the additional demand? Possibly not given Pinewood has fewer GPs than it should and has 50% more patients per GP than the NHS recommend. There is a serious UK-wide GP recruitment problem which makes it very difficult to recruit

11. Schools

Taylor Wimpey are proposing a new primary school on the site. However having discussed this issue with representatives from Sproughton Primary School the feedback is that a school is unlikely to be built on the new site as it would be too small to be viable.

School places will be needed but this requirement will grow slowly according to the number of houses erected according to the council formula. This means that any measures will be of a temporary nature for a considerable time until the numbers reach a sufficient level to warrant more permanent measures. They already have a small hall, a limited number of toilets and full to capacity classrooms. Their PAN is 105 but in 2013-14 the number of pupils was increased to 108 due to appeals. Any increase in numbers without additional facilities would impact badly on the quality of the learning environment for the pupils.

They are also concerned both short term as there is a gradual increase in numbers but also long term. The school could be left in an interim state with one additional classroom, even if this were eventually to become a permanent fixture and not a mobile, to accommodate some of the places but no increase in other facilities. This would also create the additional tension for teachers. One more class would necessitate a teacher having to cover two stages of the curriculum and not just two year groups as the numbers would not be sufficient for two additional teachers one per key stage.

12. Creeping Coalescence.

Ultimately Sproughton could be absorbed into Ipswich as the green space between it and Ipswich is gradually built-on. 475 houses at Wolsey Grange, possibly additional houses across the A1071 and Hadleigh Road up to the A14, housing & new business on the brownfield Sugar Beet site which includes the fields next to the Millenium Green all this amounts to creeping coalescence against **Policy CS7: Strategic Site Allocation - Babergh Ipswich Fringe** which states *"A Masterplan will be required which should: i) be based upon and designed around a green infrastructure framework providing high quality design, structural landscape planting, and connections to or potential links with existing formal and informal green spaces, wildlife areas, and natural landscape settings and features, particularly the Gipping Valley footpath, Chantry Park and Belstead Brook Park, and ensure a separate identity and avoid creeping coalescence with adjacent settlements;"* What guarantee does Sproughton have that it will remain separate from Ipswich? **3.3.3.7 of the Core Strategy** considers a review of SLA designations and we would urge BDC to maintain

this designation for Chantry Vale to maintain the Green Boarder between Sproughton and Ipswich, to preserve a beautiful and interesting Valley for the recreational benefit of the people of Ipswich and the surrounding area, and to preserve this valley as a proper wildlife corridor between Chantry Park and the Gipping Valley, not just as some wide footpath to satisfy a greenway designation.

13. Cumulative Effect of Development in other Areas.

There are developments underway/planned in Bramford, Pinewood, Belstead, Great Blakenham, Hadleigh and Sudbury which will all increase the loading on existing infrastructure. Although additional facilities can be provided, and traffic mitigation measures undertaken, there is no guarantee that these will work and there is little confidence that they will be provided and work given past history (e.g. Section 106 & Snoasis). If this development goes ahead the developers should be forced to pay for additional traffic mitigation measures if their traffic model proves incorrect.

We thank Babergh District Council for extending the deadline for comments to 18th September. Given the planning application was submitted on 29th July with a 21 day response period with an associated ~90 documents to review, we feel that the original 21 days was completely inadequate a period of time to review, collate comments and prepare a response, especially as this was during a period when most people are on holiday so would have been unable to comment and parishioners should be given sufficient time to respond.

It should be noted that this letter also reflects the concerns of the 100+ parishioners who attended the public meeting that Sproughton Parish Council held on 3rd September 2015, also attended by our district councillors, Nick Ridley and Barry Gasper (in listening mode).

Sproughton Parish Council asks that you consider each point made carefully and that you advise those that will make the decision on whether to grant planning consent or not of these points in details and not in summary, and that Officers of the Planning Authority properly and fully assess this Council's representation and accordingly recommends that consent is not granted for the proposal as submitted by the applicant.

Please confirm that you have received this letter and that our comments will be taken into account. We would like a formal written response to our comments.

Yours faithfully,

Mrs S Frankis
Clerk to the Parish of Sproughton