|  |  |
| --- | --- |
| Ms Gemma WalkerPlanning Department, Babergh and Mid Suffolk District Councils, Endeavour House, 8 Russell Road, Ipswich Suffolk IP1 2BX | Sproughton Parish CouncilThe Tithe BarnLower StreetSproughtonSuffolk IP8 3AA |
|  |  |
|  | 13th August 2021 |

Dear Ms Walker,

**With reference to DC/21/02671 ‘*Outline planning permission (some matters reserved, access to be considered) Town & Country Planning Act 1990 – Erection of up to 750 dwellings, and up to 3ha of primary education land, public open space, sustainable drainage systems (SuDS), landscaping and highway improvements (accompanied by EIA statement). Land North of the A1071, Ipswich*’ (53ha, 131ac)**

Sproughton Parish Council **object** to this planning application in its present form due to the following concerns many of which have been raised by our community.

We also rely heavily on the reports completed on our behalf by ‘Impact Planning Services’ and ‘Landscape Planning & Landscape Architecture Services’ which have been submitted separately but attached as Appendices for easy reference. We also note many of the issues that cause us concern are replicated in other reports & submissions to yourselves, including reports commissioned by BMSDC[[1]](#footnote-1) which should therefore carry substantial weight. We concur with the comments made by the residents of Red House Farm.

1. **There should have been a Master Plan covering the entire area proposed for Wolsey Grange 1 and Wolsey Grange 2 up to the Sproughton Enterprise Park (SEP).**
	1. The Core Strategy Examination Report (14Jan14) by Government Inspector Mr Phillip JG Ware BSc(Hons) DipTP MRTPI, acknowledges the argument by Ipswich Borough Council (IBC) that the Ipswich Fringe CS7 Strategic Development site should be subject to a Masterplan looking at the whole area proposed for development. IBC also raised this issue again in the Hybrid Planning application for the site describing that area as Strategic Development between it and what is now the SEP. Mr Ware concluded that although desirable, there is no reason to delay the development of the Ipswich Fringe site whilst the deliverability of this wider area is considered. Because, development of the wider area would be in excess of the requirement justified in the plan period (2011-2031) and there was no policy to support it. Consequently, the Master Plan for Wolsey Grange 1 only considered that site even though it is clear that by this time development of the rest of Chantry Vale was under consideration. This wider area from and including what is now Wolsey Grange 1 and up to the SEP was in effect a strategic development area and although the Inspector recognised the advisability of a Master Plan considering the whole area which would have considered the total needs, design and impacts of all the development in the area he recommended that only a Master Plan for the Wolsey Grange 1 site was required because he considered development of the wider area was not justified until sometime after the plan period ended in 2031. But here we are ten years prior to 2031 actively considering the final stage of development of the valley; a process that appears to have started either before or very shortly after the adoption of the CS in 2014.
	2. Wolsey Grange 1 & Wolsey Grange 2 are quite clearly one development by one developer clearly linked by community, facilities and planning which were envisaged and provisionally planned for at or before the Wolsey Grange 1 application (see reference in WG Masterplan document). But, there is virtually no mention of this prior to the planning approval. The reason why Mr Ware agreed to the Master Plan for CS7 (WG1) being restricted to just that site was his understanding that there was no justification in what is now Wolsey Grange 2 coming forward before 2031. This is not the case now and therefore a Masterplan considering the overall infrastructure, design, community needs, and impacts on the whole of this strategic development area (from and including Wolsey Grange 1 through to the SEP) is now appropriate. If this cannot be undertaken then we would urge that in all matters the Planning Committee consider that this should have been the case and it therefore becomes inappropriate to consider this development like some windfall development in isolation but should be considered as part of a wider development and not as a single isolated 1,225 home community The cumulative impact of the development should be considered. It should be noted that a development of this size needs its own infrastructure. Wolsey Grange 2 is NOT part of the current local plan but is included in the emerging BMSDC JLP which has not been through examination therefore is not an approved site hence the reference to ‘windfall’.
2. **The present application would have an unacceptably high adverse impact on the Landscape Value of Chantry Vale.**
	1. We note that Taylor Wimpey’s landscape assessments suggest the value of the landscape is reduced partly due to the LaDoria High Bay Warehouse and partly due to Wolsey Grange 1. The planning application for the High Bay LVIA asserted that this building would have a negative impact on the area of this site suggesting that presence of trees etc would limit and localise any impact. This assertion was not challenged by Place Services who were commissioned by BMSDC to consider the LVIA. Wolsey Grange 1 is still only in the construction stage and the expectation is that new plantings for screening and the existing trees along the A1071 sides will soon grow and act as adequate screening from the valley. Its visual impact is therefore only temporary and it is premature to consider this as a factor.
	2. However more to the point, as argued above this whole area and cumulative impacts should have been subject to a Masterplan because the Policy CS7 Inspector did not consider there was justification in this site coming forward until after 2031. The LaDoria high bay warehouse and Wolsey Grange 2 are virtually consecutive applications with a combined detrimental impact on this defined valley, they should be considered against the cumulative impact on the valley. The Wolsey Grange 1 site was under consideration as far back as 2014. BDC Officers were referring to the valley as ‘Wolsey Grange 2’ before the Wolsey Grange 1 application was determined and documents in the Wolsey Grange 1 application were (somewhat presumptuously) already referring to the development of what is now the proposed Wolsey Grange 2 site.
	3. We would also note there is little difference between the applicant’s landscape appraisal and the Place Services landscape appraisal, but this is unremarkable as it is our understanding that both parties have been liaising on this project for at least two years. However the various assessments provided by ‘Landscape Planning & Landscape Architecture Services’ (Lucy Batchelor-Wylam) and by ‘Alison Farmer Associates’ (Alison Farmer) for this area, although completed separately without collaboration have reached different conclusions.
	4. The Applicant tends to focus on the whole site suggesting the landscape value have decreased because of the building of the LaDoria High Bay Warehouse and Wolsey Grange 1. Sproughton Parish Council do not agree with this as we believe the whole area should have been subject to a Master Plan. The impact of what is in effect one development or consecutive developments should be viewed as causing cumulative harm to the original value of the untouched Chantry Vale, rather than considering the impact of each application piecemeal, with the steady whittling away of Chantry Vale’s landscape value.
	5. Considering the Reports of Alison Farmer Associates, ‘The Ipswich Fringe Sensitivity Study’, ‘The Sproughton Neighbourhood Plan - Landscape Appraisal’ and the ‘Land at Red House, Chantry Vale, Sproughton-Landscape Appraisal’ along with the Landscape Response to this application on behalf of Sproughton Parish Council by ‘Landscape Planning & Landscape Architecture Services’ (Lucy Batchelor-Wylam) there is a significant body of evidence to show a higher level of sensitivity and value of the landscape. This is particularly so when rather than considering the whole site the individual elements are considered which then highlights areas of development which are impacted more seriously hence having an unacceptable adverse impact. These reports also highlight specific landscape values that are important and unique in this area adding to the importance of protecting their character and value in a location that has great social and leisure value to future generations in this developing area.
	6. Lucy Batchelor-Wylam states that rather than considering the encroaching urban edge as a reason to develop this area the argument should be that the rarity of this landscape close to the urban edge of Ipswich should be more reason to preserve what remains.
	7. The adverse landscape impacts are closely related to the adverse heritage impacts as this is a historic landscape that defines the historic settings of the heritage assets. There is insufficient buffer between the proposed development beside the historic edge of Grade II listed Chantry Park. The proposed development on the valley side/ridge between Grade II Listed Red House Farm and the A14 will destroy the landscape backdrop of Red House Farm viewed from the East and from Chantry Park. This part of the development will also be detrimental to the sunken & treasured Church Lane (now designated as a ‘Quiet Lane’) and adversely impact on the Grade II Listed Springvale Farm which has only a narrow (insufficient) green barrier separating it from the proposed development. The ‘Rolling Valley Farmland’ character of the valley slope South West of Red House Farm will also be completely altered with artificial stepped Attenuation Basins again altering the historic landscape setting in front of Red House Farm.
	8. The current Local Plan defines this Valley as a Special Landscape Area and with reference to Policy CR04 which states development should not take place unless it is not detrimental or improves the Landscape value. This is clearly not the case.
	9. The emerging BMSDC JLP considers landscape against its value primarily guided by the Landscape Character Type Assessment. As a valley defined as Rolling Valley Farmland topped out by Plateau Farmland the assessment guidance recommends that new development should be avoided especially near the valley side tops and is better placed on the plateau where it can be screened and hidden. This is precisely what this development is not doing.
	10. Alison Farmer Associates identify the 35m AOD contour line as being critical to this as although the Landscape Character type plan does not exactly follow that line it is in fact a line where the edge of the plateau drops of more significantly and development beyond that is effectively falling into the valley side where it will cause the most harmful impact.
	11. The guidance to screen development on the plateau is also being ignored as instead of green screening the application proposes to ‘filter’ views of the edge of the development which from their drawings will amount to no more than a scattering of a few unspecified trees. This is not sufficient to preserve the value of the landscape wherever the edge of the development is set. In addition, the application proposes a ring of development around the lower edge of the development with white or light coloured buildings which will present a heavy, defined and glaring border line of the development right round the valley sides adversely impacting on the green landscape and settings of the heritage assets.
	12. The proposed style and design of the development along the A1071 and into Hadleigh Road is also highly damaging to what has been recognised for decades as one of the most pleasant and green routes into Ipswich. This was a significant reason for the rejection of the Wilcon Homes Appeal in 1988 given by the Rt Hon Nickolas Ridley, Environment Secretary at that time. At present people arriving into Ipswich from the South West travel along the A1071 which is bordered by rural landscape and then turn into Hadleigh Road which retains its Rolling Valley characteristic as a sunken lane that dips into the Chantry Vale bordered by fields and historic farm buildings. It continues past Chantry Park bordered by woodland, trees, hedgerows and widely spaced old or character housing before finally hitting the urban character of Ipswich at the Ipswich border. This will change into an abrupt and prominent 3 storey high estate style entrance as people cross the A1071 bridge destroying the continuity of this notable pleasant green route into Ipswich.
3. **The present application would have an unacceptable adverse impact on the Heritage Assets in Chantry Vale.**
	1. Heritage is closely related to Landscape as the Heritage Assets of this valley have a sense of place in this rural landscape so for that reason most of the comments relating to landscape apply to heritage.
	2. The application as submitted is hugely damaging to these assets destroying the historic edge of Chantry Park, completely surrounding and swamping Red House Farm in a backdrop of dense urban development 3 storeys high towering over it on the hillside emphasised by a line of white buildings half way down the valley sides looping right round Red House Farm, and the same urban development backed right up to Springvale Farm.
	3. This observation is confirmed by various professional heritage consultations, some commissioned by BMSDC who must be considered as providing the most unbiased and reliable advice to the council.
	4. In particular the BMSDC commissioned JLP Historic Environment Appraisals Stage 2: Heritage Impact Assessments for Preferred Sites by LUC which identifies the need for a broad band as a buffer between Chantry Park and any development which is indicated in the accompanying plan for this site as a buffer of something between 50 and 100 meters unlike the 10 or 15 proposed by the applicant. It also says that development on the valley side/ridge to the West and behind Red House Farm would be unacceptable due to its harmful impact as a backdrop to Red House Farm and recommends that development on the valley side further North on that Valley Side would be unacceptable as it would then necessitate access via Church Lane (now a ‘Quiet Lane’) which should be protected.
	5. The conclusions of this significant and important BMSDC report by LUC is supported by observations from other Heritage consultants. Notably by Place Services commissioned by BMSDC to assess this application, the Heritage Impact Assessment by Michael Collins contained in the objection response by Red House Farm, and our own report commissioned by Impact Planning Services Ltd.
4. **There is an inadequate provision of community facilities in the application.**
	1. There is no social or community provision in this development. This site is clearly a continuation of the Wolsey Grange 1 site creating an isolated community of 1,225 homes which is twice the size of the existing parish and yet there are no community halls, social club facilities or sports provisions beyond children’s play areas and fitness trails which are of little benefit in winter, at night and in the rain. It is not acceptable that a development of this size will just impose its social needs on the surrounding communities that have strived to build up facilities appropriate to its size, not adequate for a trebling of the community population and in any case remote and isolated from this new development. Such provision needs to be included in the outline application to ensure it will be delivered.
	2. We have heard suggestions that the new primary school can provide these, but there is no obligation on the Education Authority to do so and even if they initially do agree no obligation to continue to do. Their obligation is to provide education and if community access in any way interferes with that such community access would undoubtably be withdrawn. We find it unjustifiable that the Wolsey Grange 1 application which amounts to 475 homes, larger than our own village, has no such facilities. To expand this community by another 750 homes and still ignore these social and community needs is indefensible at a time when we should have a better understanding of peoples social, community and mental health needs.
5. **This Application is premature.**
	1. As previously argued, in relation to Masterplans, development in this area was considered to be in conflict with the needs and policies of the Core Strategy/Local Plan within the plan period to 2031 by the Inspector of the Core Strategy in 2014. It is therefore in conflict with directions and expectations against which the present Local Plan was approved for another ten years. This is in direct conflict with the emerging BMSDC Joint Local Plan to 2037 but until and unless this site is approved and adopted in the new BMSDC JLP it remains premature and in conflict with the present Local Plan.
6. **Unacceptable and significant threat of Creeping Coalescence to Sproughton.**
	1. Sproughton is under increasing threat of merging with neighbouring communities (Bramford, Ipswich. Burstall) and losing its individual & historic identity (i.e.creeping coalescence). The 1,225 homes will triple the size of our parish overwhelming the individuality of our village. This development will come right up to the edge of the A14, the Church Lane Underpass and proposes a dominant three story high Estate Like entrance on the A1071 bridge commanding what is presently a main, but green countryside route into Ipswich from Sproughton. These are factors that will have an urban imprint on the village destroying its rural heritage and isolation from Ipswich. As the LPA, BMSDC has a duty under the NPPF to prevent creeping coalescence.
7. **Inadequate consideration for cumulative impact on local infrastructure in the area.**
	1. The local infrastructure is inadequate. Inadequate provisions are being made for this site and other developments in the surrounding area. Local primary health care is already overwhelmed and inaccessible to new residents as the local facilities are already oversubscribed and this has been exacerbated by the recent closure of a local surgery.
	2. NHS Dental and GP surgeries are NHS funded but they are privately owned so Developers making S106 payments to the local NHS does not fund new surgeries and certainly does not staff new surgeries especially if existing surgeries are unable to recruit sufficient staff. New surgeries will only be created if there is investment in surgeries but this simply is not happening, rather the opposite. So it would appear the only route to creating new additional local Primary Health care to support new developments when they are built is for Developers to either fund or build new surgeries.
	3. A plan for adequate primary health care should be agreed with I&ESCCG & adjacent surgeries before a development of this size is approved and provided before new residents take up residence. It is unacceptable that the health of new residents is not a primary factor in the consideration of new development.
	4. Public transport is inadequate, absent or too infrequent for the transport needs of the proposed cumulative housing growth within, around and feeding into Sproughton, With facilities too distant for walking this will force new residents into cars and onto the local roads that already cannot cope. The highway improvements so far introduced appear to have made no difference. This is primarily because the main problem is elsewhere. Traffic into Ipswich taking either the Hadleigh Road or the London Road all converge where the two roads join in Ipswich and this all backs up frequently with significant congestion. This is bad for the environment, for pollution, for health and for drivers. So, some traffic diverts off the A1071 into Sproughton to avoid this congestion but Sproughton’s streets were never intended for heavy modern traffic. They are narrow ancient roads closely bordered by old and treasured houses in a manner more suitable for horse and carts so they too become congested and the only resolutions would appear be to restrict traffic or bypass the village.
	5. Ignoring this wider adverse impact is ignoring a significant issue that needs to be resolved before considering this application otherwise the resulting load on & around Sproughton’s roads will be untenable for existing & future residents.
8. **Drainage strategy presenting unacceptable risk to listed Grade II Heritage Asset.**
	1. This application proposes a SUDS drainage strategy that takes the run of from over 1,200 new homes and sends it through a network of ancient drainage ditches and under an important, sensitive and vulnerable Grade II listed building supported by an assessment based on minimal compliance with future storm predictions. In light of recent national flood disasters, more recent European Flood disasters, the regularity that meteorological records are being broken and now the recent IPCC report that indicates global warming is accelerating faster and more erratically than previous predictions this seems an ill-considered approach.
	2. A point that is ignored in planning is that East Anglia is one of the driest areas in the country and basing global warming storm predictions on local historic data even with a 30% global warming increase comes nowhere near the potential increase that might be caused by changing weather patterns. If global warming changes UK weather patterns such that East Anglia is subject just to average UK rainfall this would represent a 100% rainfall increase. What is more SUDS Strategies are focused on severe storm events that may cause localised flooding but the threat of flooding downstream primarily comes from sustained heavy rainfall events which do not appear to be considered in most SUDS Assessments.
9. **No consideration of Sproughton Neighbourhood Plan Design Codes.**
	1. The Sproughton Neighbourhood Plan Design Codes document (Mar’21) is a report that stands on its own as guidance for appropriate development in this Parish. It should be respected by the developer. In this respect three and two & a half storey homes are not in accordance in a development that will overwhelm the Parish. The proposal to encircle the valley with a ring of white/light properties on its frontage facing into Red House Farm and the valley is equally unacceptable and visually damaging to the character of the Parish, the landscape and the Heritage Assets.
10. **Lack of clarity of proposed building sizes and planting.**
	1. The application mentions bungalows but not how many or where they will be built. Only maximum storey hights are disclosed and applied for leaving no guarantee that any much needed bungalows will be built. If this application is approved in its present form the potential is that only the maximum building sizes will be built. This is unacceptable the application should at this stage provide numbers or percentages of different storey heights so there can be an assurance of how many bungalows etc will be built otherwise the planning committee should consider this site as the maximums being proposed.
	2. The Sproughton Neighbourhood Plan specifies a **maximum of 2 storeys** for buildings in the parish as stated in the AECOM Design Codes document. Having reviewed the actual heights of the more modern two storey homes in the parish an average slab to ridge height of 8m is normal and we consider appropriate **NOT** the 9.5m specified in the document submitted by Taylor Wimpey ‘210317WG2\_Parameter Plan – Maximum Building Heights Plan’. This 9.5m height feels as though it is actively allowing for extension in the roof space thereby creating a 2.5 storey building out of a supposed 2 storey building. Indeed having reviewed the heights specified by Taylor Wimpey in the previously mentioned document the building heights seem curiously high for the number of storeys and hence, if built to those heights will appear much more dominant in the landscape , more overwhelming and less likely to be screened effectively.

|  |  |  |
| --- | --- | --- |
| **#Storeys** | **Taylor Wimpey Specified Heights** | **SPC Preferred Heights** |
| 2 storeys | 9.5m | 8.0m (max permitted as per emerging NP) |
| 2.5 storeys | 11.5m | 9.5m (not permitted as per emerging NP) |
| 3 storeys | 14.0m | 11.0m (not permitted as per emerging NP) |

* 1. There also appears to be a contradiction in the previously mentioned document in that the 2 storey primary school would be 12m high but a 2 storey home would be 9.5m high. We alerted Taylor Wimpey to the AECOM Design Codes document prior to the application submission, but disappointingly they have ignored our specified height requirements.
	2. The green infrastructure and planting information also gives little detail of numbers or density of planting. Where this relates to sensitive landscape and Heritage Asset areas this is too vague and unacceptable because the level of planting and green screening of the development affects the adverse visual impacts on these areas. This needs to be clearly defined before planning officers and the planning committee are expected to consider the visual impact on sensitive areas. It is not possible to accurately consider and be assured of the levels of residual adverse visual impact without clear details of green screening (what this will look like initially and what it is likely to look at maturity).
	3. The design and access statement equally only talks about filtered views which is vague and unacceptable as this may be nothing more than few spaced out trees providing no realistic vegetated screening of the development at all, as appears to be the case in the indicative drawings. The D&A Statement also proposes a band of white and pastel buildings all around the base of the valley side development half way down the valley side. This would accentuate the development edge visually conspicuous and ugly rolling into the valley sides encircling the valley landscape and Heritage Assets completely unscreened by this proposed filtered view. This is unacceptable.
1. **Poses threat to two important local Wildlife Areas**
	1. The application proposes net biodiversity gains primarily in the form of wildflower areas and unspecified planting. However, these are in areas that are already green and the priority here should be the protection of three wildlife areas. Chantry Vale sits beside the County Wildlife site in Chantry Park, The Chantry Cut Island nature site and river valley (SEP Site) and this also acts as a wildlife route into and supporting a Third site the County Wildlife Site on the River Gipping from the railway line bridge at Boss Hall to Yarmouth Road. These sites support an abundance of diverse and protected species. The SEP site is scheduled this year for designation as a Local Nature Reserve as part of the agreed Sproughton Enterprise Park Landscape and Ecological Management Plan.
	2. These wildlife sites must maintain healthy connection with the wider countryside via A14 wildlife corridors to ensure health of species by genetic exchange and the Chantry Vale sits between these sites and the wider countryside beyond the A14 effectively making Chantry Vale an important wildlife extension for all three of these sites. This requires easy and safe transit past the A14 usually in the dead of night primarily via the Copdock Interchange tunnels, A1071 bridge, Church Lane Underpass and under the A14 River Gipping Bridge.
	3. But overdevelopment is slowly cutting of these corridors; Access via Copdock has all but been destroyed by the Wolsey Grange 1 development including the removal of an ancient hedgerow that was required to be retained and still has not been replanted and this Wolsey Grange 2 application would deter wildlife from the A1071 bridge. This is unacceptable if these wildlife areas are to be nurtured then anything that supports their future needs to be retained or improved.
	4. Converting the natural area in the valley between these wildlife areas and the wider countryside into parkland for the use of the residents of 1,225 homes will have a detrimental impact on wildlife movement across the Valley and into these important wildlife areas. Also on average 1 in 9 homes in the UK have domestic cats and for 1,225 homes that would represent introducing 136 highly predatory domestic cats into the wildlife areas and the valley corridors which with the footfall of so many new residents could be devastating to the movement of wildlife in these areas. It is suggested that some areas are ‘rewilded’ and public access restricted.
	5. This application needs to demonstrate how it will minimise excessive footfall and domestic cat intrusion into these wildlife sensitive areas.
	6. Wildlife access in and out of these two wildlife areas needs to be retained, preserve and enhance if these wildlife assets are to thrive.
2. **Not acceptable without planning conditions to ensure 35% affordable housing.**
	1. This commitment is welcomed but was not honoured in the Wolsey Grange 1 application based on questionable viability claims (it is believed around 20% affordable homes is being delivered). This cannot happen again if this outline planning application is approved it should be conditional on 35% affordable housing approval such that the approval will be withdrawn if not delivered. In addition we believe that Taylor Wimpey should publish, at this stage, viability data supporting its assertion that it can deliver 35% affordable homes in Wolsey Grange 2 to avoid a repeat of the Wolsey Grange 1 issue.
3. **Inadequately defined Primary School Provision**
	1. This outline planning application should not be approved without assurances from the developer and education department that the school will be built in sufficient time to accommodate children moving into the present Wolsey Grange One development as agreed when the WG1 planning application was approved.
	2. The building of 475 homes on Wolsey Grange one is already progressing but families are moving in without any new schooling provision being provided. A new school as part of Wolsey Grange 1 was identified as a necessity for that site but if this new application is intended to follow on from Wolsey Grange 1 then the school provision associated with this application will not be built until sometime after Wolsey Grange 1 is fully occupied leaving hundreds of families in residence without the school that was planned.
	3. Our present school cannot accommodate all the local children and this new school will be a worthless planning assurance for all the extra families moving in if it won’t be seen for years

APPENDIX A - **IMPACT Planning Services Report**

**ADD HERE**

**APPENDIX B - Landscape Planning & Landscape Architecture Services**

**ADD HERE**

1. Place Services Heritage Response [↑](#footnote-ref-1)