



ORWELL GREEN

*Orwell Green Garden Village*

*APRIL 2019*

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*Planning & Affordable Housing Statement*  
*(including draft Heads of Terms)*

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## EXECUTIVE SUMMARY

i. This planning statement supports an outline planning application made by Gladman Developments Limited for a new Garden Village to be known as Orwell Green.

ii. The description of the development is as follows:

"An outline planning application for the removal of existing on site reservoirs and the development of a new Garden Village on land north of the A14 and west of the A12, comprising of the following: the erection of up to 2,700 dwellings, (including 33% affordable housing); vehicular access from a new roundabout off the A12, improvements to Felixstowe Road (including new pedestrian/cycle footways); two mini roundabouts along Bucklesham Road; a neighbourhood centre comprising 23,800m<sup>2</sup> of floorspace within use classes A1, A2, A3, A4, A5, D1 and D2 and a market square (including retail, a medical centre/pharmacy, community hall/pavilion, nursery/crèche facility, and a pub); two primary schools; parking and a café; apartments with care (C2 use class); a village green (including a cricket pitch and bowling green); new sports pitches, club house, changing facilities, parking, tennis courts; green infrastructure including a new community park (and car park), trim trail, neighbourhood equipped areas of play, locally equipped areas of play, habitat enhancement, landscaping and public realm works, community orchard, allotments, footpaths and cycling routes; acoustic mitigation and associated infrastructure including roads and sewers, sustainable drainage systems (SuDS), and associated engineering and earth-works. All matters reserved except for means of access."

iii. The application site represents a suitable and sustainable location for housing.

### Design Led Approach

iv. This proposal for a new garden village in East Suffolk is an effective way to deliver housing within an appropriate time frame and with a critical mass that will facilitate the delivery of infrastructure such as schools, health centres and transport improvements to the benefit of new and existing communities.

v. The principles of Garden Villages set expectations for high quality place making, with consideration of the approach to creating a clear identity with vibrant mixed-use communities that support a range of local employment types and premises, retail opportunities, recreational and community facilities.

- vi. The Orwell Green proposals are influenced by these principles setting key infrastructure within generous, accessible and good quality green infrastructure that promotes health, wellbeing, and quality of life, and considers opportunities to deliver environmental gains such as biodiversity net gain and enhancements to natural capital.
- vii. The proposed development has been carefully considered to ensure that it will provide high quality sustainable development. Along with the wider community benefits, this scheme provides a development which will complement the character of the surrounding area in terms of scale, density, character and quality.
- viii. The delivery of a new garden community is a complex, long-term project therefore when developing the proposals an integrated approach to infrastructure, housing, business investment, employment and development has been used to ensure the proposals offer a strong prospect of early delivery and a significant acceleration of housing delivery.

### Accordance with the Development Plan

- ix. Development proposals should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- x. The proposals are in accordance with several environmental, design and technical development-management policies that can be considered up to date and are relevant to this application.
- xi. However, the Development Plan in place does not plan positively for future development to meet the objectively assessed needs of the District and is time expired. It is therefore considered that policies related to housing supply (SP2, SP29 and DM3) cannot be considered up-to-date and should be afforded reduced weight in the planning balance.
- xii. It is considered that these are the most important policies for determining this application and consequently, the presumption in favour of sustainable development is engaged.
- xiii. In these circumstances, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

### Benefits arising from development at this location

- xiv. The proposal offers the opportunity to deliver a number of benefits including:
  - a. 2,700 dwellings can be delivered on-site, with a diverse mix of sizes, types and tenures to meet local housing needs.

- b. 33% of these dwellings will be "affordable housing" for which there is an identified substantial unmet need.
- c. 70 dwellings of extra-care will also be delivered which will not only meet a specific local housing need, but also potentially aid the release of mainstream housing stock in Suffolk for other residents.
- d. The delivery of key local infrastructure including two primary schools, sports and play facilities, a medical centre, a supermarket and other smaller retail units.
- e. New sustainable drainage system features which will be designed to maximise landscape and biodiversity benefits.
- f. The development will include the provision of strong green infrastructure including a new community park.
- g. New tree and hedgerow planting, enhancing the existing on-site landscape features and resulting in a net gain in biodiversity.
- h. Local benefits through investment in the local community.
- i. District-wide benefits, in terms of making a strategically important contribution to housing supply and economic objectives; and
- j. Support for national objectives in boosting the supply of homes and delivering sustainable development.

## Summary

- xv. In this case, the proposals are not fully in accordance with the Development Plan but there are material considerations which indicate permission should be granted, including the engagement of the presumption in favour of sustainable development.
- xvi. The identified harm arising as a result of the development would not be considered sufficient, either in combination or by themselves, to outweigh the benefits of delivering housing as proposed.
- xvii. There are further significant material considerations, which overall justify the grant of permission for the development proposed.

# 1 INTRODUCTION

## 1.1 Scope of the Planning Statement

1.1.1 This Planning Statement has been prepared in support of an outline planning application for a new Garden Village to be known as "Orwell Green". The application is submitted by Gladman Developments Limited (Gladman).

1.1.2 The description of the development is as follows:

**"An outline planning application for the removal of existing on site reservoirs and the development of a new Garden Village on land north of the A14 and west of the A12, comprising of the following: the erection of up to 2,700 dwellings, (including 33% affordable housing); vehicular access from a new roundabout off the A12, improvements to Felixstowe Road (including new pedestrian/cycle footways); two mini roundabouts along Bucklesham Road; a neighbourhood centre comprising 23,800m<sup>2</sup> of floorspace within use classes A1, A2, A3, A4, A5, D1 and D2 and a market square (including retail, a medical centre/pharmacy, community hall/pavilion, nursery/crèche facility, and a pub); two primary schools; parking and a café; apartments with care (C2 use class); a village green (including a cricket pitch and bowling green); new sports pitches, club house, changing facilities, parking, tennis courts; green infrastructure including a new community park (and car park), trim trail, neighbourhood equipped areas of play, locally equipped areas of play, habitat enhancement, landscaping and public realm works, community orchard, allotments, footpaths and cycling routes; acoustic mitigation and associated infrastructure including roads and sewers, sustainable drainage systems (SuDS), and associated engineering and earth-works. All matters reserved except for means of access."**

1.1.3 The starting point for determination of this application is the Development Plan, comprising of:

- Core Strategy and Development Management Policies (July 2013)
- Site Allocations and Area Specific Policies (January 2017)
- Saved policies of the Suffolk Coastal Local Plan (1994, incorporating First and Second Alterations – 2001 & 2004)

- Minerals Core Strategy (September 2008)
- Waste Core Strategy (March 2011)

1.1.4 The NPPF (2019) emphasises the Government’s objective of “*significantly boosting the supply of homes*” (paragraph 59) and in the circumstance, the presumption in favour of sustainable development (paragraph 11) applies.

1.1.5 The Country faces a national housing crisis and the NPPF (2019) is explicitly supported by statements by the Government which highlight the need to build many more new homes,

**“The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and start to tackle years of under-supply.”<sup>1</sup>**

1.1.6 The development, as proposed, is sustainable and will help to deliver the new homes needed to meet the identified local housing need, helping address a key economic and social priority for the Government and East Suffolk Council, formerly known as Suffolk Coastal District Council and Waveney District Council (the Council).

1.1.7 This Planning Statement explains why development is needed in this location and the significant social, environmental and economic benefits that the proposal will bring to the area. It also confirms, drawing on the supporting technical information, that no significant and demonstrable adverse impacts would arise as a consequence of the development, to outweigh these benefits.

1.1.8 The Statement further explains the policy context and how the proposed development complies with the NPPF (2019) and why it is appropriate to bring forward development now at this site.

1.1.9 This Statement is one of a suite of documents submitted to support this application and comprehensively demonstrates the suitability and sustainability of the site for development, as proposed.

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<sup>1</sup> Fixing our broken housing market (DCLG, February 2017)

## 2 THE PLANNING APPLICATION

### 2.1 Scope of the Application

2.1.1 This outline planning application is seeking approval in principle for the development proposals. Together, the description of development, Design and Access Statement and other supporting documents describe the nature and content of the development proposed.

2.1.2 Details of the parameters of the development for which outline planning permission is sought are included within the Design and Access Statement, ensuring that an appropriate level of information is provided on the scale, nature and general arrangement of the development proposed at the outset.

2.1.3 The application is accompanied by a range of technical supporting documents to enable the effects of the development to be fully considered.

2.1.4 Notably the proposals have been subject to Environmental Impact Assessment (EIA) and the application is accompanied by an Environmental Statement (ES).

2.1.5 The ES was formally scoped with the Council and addresses all likely significant environmental effects of the development in a systematic manner.

### 2.2 EIA Scoping

2.2.1 A request for a Scoping Opinion was submitted to the Council on 1<sup>st</sup> November 2018 (Appendix 2.1). The Council adopted a Scoping Opinion on 20<sup>th</sup> December 2018 following consultation with statutory consultees.

2.2.2 The Scoping Opinion and consultee responses have been used as a basis for identifying the likely significant impacts to be considered within this ES.

2.2.3 The Scoping Opinion noted that the applicant had not sought the LPA's formal pre-application advice on the principle of the development and the mix of uses when considered against the policies of the existing and emerging Local Plan, nor had any advice been sought, (outside of Local Plan engagement), on the indicative masterplan.

2.2.4 As referenced in the Statement of Community Involvement submitted with this application, the applicant met with the Council and other key stakeholders during the pre-application stage and comments raised have informed the development of the application proposals, including the mix of uses and the indicative masterplan.

2.2.5 The following topic areas have been considered within the EIA, and are included as technical chapters within the ES:

- Landscape and Views
- Archaeology
- Biodiversity
- Flooding, Hydrology and Water Resources
- Noise and Vibration
- Air Quality and Odour
- Soils and Agricultural Land Quality
- Traffic and Transport
- Socio-Economics
- Climate Change
- Human Health
- Education

## 2.3 The Proposal

2.3.1 The application drawings submitted as part of this application for approval are:

- Site location plan (drawing number: 7939-L-01 rev B)
- Proposed site access layout – A12 site access roundabout (drawing number: P001 rev P02)
- Proposed site access layout – Bucklesham Road (drawing number P006-01)
- Parameters plan (drawing number: 7939-L-15 rev D)

2.3.2 The application proposal includes the following:

- Up to 2,700 dwellings, comprising a mixture of market and affordable housing (Use Class C3);
- Up to 25,000 sqm of Retail, employment, community, assembly and leisure facilities (Use Classes A1-A5, B1, D1, D2) comprising a neighbourhood centre;
- Extra Care provision (Use Class C2);
- Land for two Primary Education facilities (Use Class D1);
- The provision of new and amended vehicular and pedestrian access points from the A12;

- Open Space, Sports Pitches, Formal areas of Play, Youth Provision and associated facilities and amenity space, including, landscaping, green infrastructure, habitat creation (SANG), walking and cycling routes and sustainable drainage systems;
- Any wider land outside the site boundary needed for development specific infrastructure.

2.3.3 The development would be served by five access points across three junctions. A new roundabout is proposed on the A12 which will provide the main site access for the proposed development. This roundabout will be traffic signal controlled as per the roundabout improvements which are being delivered further north along the A12 corridor by the Brightwell Lakes development.

2.3.4 A range of densities and house types are proposed to meet local need whilst respecting the surrounding environment, both built and undeveloped. 33% of the units would be affordable, to meet the requirement of adopted local planning policy. Affordable housing provision will be secured via a Section 106 Agreement.

2.3.5 The illustrative Development Framework Plan for the site demonstrates how the built development will be set within a framework of open space and green infrastructure, consistent with garden village principles.

## 2.4 Planning History

2.4.1 There is no relevant planning history on the site.

## 3 SITE LOCATION AND SUSTAINABILITY

### 3.1 Site Location

3.1.1 The 142ha site is located within the Suffolk Coastal District boundary, but on the outskirts of Ipswich Town. It is formed by two parcels, bound by the A12 to the east and the A14 to the south. To the north the site is bound by Purdis Road and to the west by land and property on Straight Road and Woodhouse Lane.

3.1.2 Roughly 6.5km from the centre of Ipswich, the site is easily accessible, being directly serviced by the A14 and A12. It has access to all the employment and higher order retail and leisure opportunities including the neighbouring Warren Heath Retail Park and the Euro Retail Park, at Ransomes Europark.

3.1.3 Importantly, it does not fall within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty nor is it within an area of fluvial flood risk, which is a constraint to future development across large swathes of the wider area. The site has no physical constraints that would prevent development.

3.1.4 This site presents an ideal opportunity to create a self-sufficient new settlement which harnesses its own identity and community, whilst remaining well connected to services and opportunities in Ipswich and the wider Suffolk Coastal area.

### 3.2 Suitable Location

3.2.1 Orwell Green Garden Village is strategically placed on the periphery of extensive employment opportunities provided by the neighbouring Ransomes Europark, whilst Ipswich is easily accessible by bus from the site, which provides a key economic centre for the wider area and is a thriving digital hub.

3.2.2 Felixstowe is also a major centre of employment, which is easily accessible by public transport from the site.

3.2.3 There are numerous smaller business and industrial units providing employment opportunities directly adjacent to the site, to the north and south, at Springbank Industrial Estate, off Purdis Road and the Three Rivers Business Centre, off Felixstowe Road.

3.2.4 The Garden Village can meet the everyday needs of the community, but it is also important to recognise that residents should be able to be active and involved within the wider

- community in which they live. Residents will no doubt draw upon the local community facilities available in neighbouring villages and towns.
- 3.2.5 The site lies in close proximity to Ransomes Europark which also provides a wider range of convenience and goods, should future residents require shopping beyond what will be provided through the new development.
- 3.2.6 The site's location adjacent to junction 58 of the A14 with the A12 provides excellent transport connectivity to Ipswich via the A1156 and Felixstowe, Colchester, Woodbridge and Stowmarket.
- 3.2.7 Railway stations in Ipswich are a short bus/car journey from the site providing sustainable transport links throughout Suffolk, Essex, London and beyond.
- 3.2.8 East Suffolk Council and Ipswich Borough Council both form part of the wider Ipswich Economic and Housing Market Area and therefore have interdependencies in terms of their future housing growth needs.
- 3.2.9 It is well known that there are limited spatial options for growth given the tightly drawn boundary to Ipswich Borough, meaning that more housing is likely to have to be accommodated by its neighbouring authorities within East Suffolk.
- 3.2.10 This site provides a timely opportunity to help to meet the housing needs of both East Suffolk Council and the greater Ipswich area in a sustainable and accessible location.

## 4 THE NATIONAL HOUSING CRISIS

### 4.1 Introduction

4.1.1 It is widely acknowledged at all levels that there is a housing crisis in this country, which has arisen as a direct consequence of too few houses being completed to keep pace with a growing population and household formation rates. The solution to address this pressing national issue is a sum of the individual parts, i.e. every local authority must ensure that a five-year supply of housing is achieved urgently against up to date, objective assessments of their needs.

4.1.2 This section of the Planning Statement will set out the context to the national imperative to boost significantly the supply of housing, the response required of Suffolk Coastal District Council and the observed effects on affordability in the District.

### 4.2 The Government's Assessment and Response to the Housing Crisis

4.2.1 In recognition of this problem, the Government is seeking to tackle this challenge from every angle.

4.2.2 The former Planning and Housing Minister, Brandon Lewis announced in 2015 the Government's intention to build 1 million additional homes by 2020 (equating to approximately 200,000 new homes per annum).

4.2.3 The commitment to further housing growth has increased with further Government statements emphasising the importance of housing delivery. At the 2017 General Election, all three major parties had manifesto commitments to build between 200-300,000 new homes per annum, dependent upon the start and end dates adopted.

4.2.4 The latest position, in the Autumn Budget 2017, confirmed the Government's ambition to deliver 300,000 net additional homes on average by the mid-2020s. This represents a significant step-change in housing delivery.

4.2.5 The highest collective period of housebuilding completions per annum was in the 1960's when an average of 340,000 homes a year were constructed. Since the 1970's there have been an average of 160,000 new homes constructed each year in England (DCLG Live table 104).

4.2.6 In July 2016, the Economic Affairs Committee released its 'Building More Homes' report. This criticised the Government's housing policy for setting a new homes target that fails to meet the needs of the country.

- 4.2.7 The 'Building More Homes' report provides data on the changes in net housing stock in England between 2007 and 2015. This is summarised in the table below:

Year	Net Additional Dwellings
2007/08	207,480
2008/09	166,590
2009/10	128,670
2010/11	121,210
2011/12	134,890
2012/13	124,730
2013/14	136,600
2014/15	170,000

- 4.2.8 The shortfall in housing delivery has been ratified by the Housing White Paper (2017) in which the Foreword and the Introduction on Page 9 states:

**“This country doesn’t have enough homes. That’s not a personal opinion or a political calculation. It’s a simple statement of fact.”**

**“The consensus is that we need from 225,000 to 275,000 or more homes per year to keep up with population growth and start to tackle years of under supply.”**

- 4.2.9 Having regard to the evidence on past completions, it is clear that a significant uplift is required in the delivery of new homes, in order to get anywhere close to meeting requirements and preventing the housing crisis from being further exacerbated.
- 4.2.10 The pressing nature of the situation and its social and economic importance is reflected by a November 2016 update from the Lyons Housing Commission<sup>2</sup> reminding us how, after decades of failure to build the homes the country needs, public concern about housing is the highest it has been for 40 years and tackling the housing crisis has risen up the national political agenda to become embedded as a top priority for Government.
- 4.2.11 The report also identified that the projections suggest we will fall far short of the Government ambition to build 1 million homes by 2020. It states:

**“For the new Prime Minister, the Secretary of State for Communities and Local Government, Sajid Javid and Minister for Housing, Gavin Barwell, a**

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<sup>2</sup> The Lyons Housing Commission, an independent group of 12 housing experts chaired by Sir Michael Lyons, was first convened in 2013 to advise on how a future government might bring about a sustainable increase in house building in England.

**sustained step change in house building will be critical to the health of the national economy and to improving the quality of life for current and future generations.”**

- 4.2.12 The foreword by the, then, Secretary of State, Sajid Javid, to the Government Housing White Paper which followed confirms a significant change in the pace of housing delivery is required to have any effect on the housing crisis we face:

**“For decades, the pace of house building has been sluggish at best. As a result, the number of new homes has not kept pace with our growing population. And that, in turn, has created a market that fails to work for far too many people.**

**Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.**

**...That has to change. We need radical, lasting reform that will get more homes built right now and for many years to come. This White Paper explains how we will do just that.”**

- 4.2.13 This application therefore responds to the national housing crisis, but as will be explained later in this Planning Statement, also to the local housing issues in the Ipswich Economic and Housing Market Area, which are contributing to the problem overall.

### 4.3 The Local Authority Position

- 4.3.1 One effect of the national housing crisis is a profound effect on affordability.

- 4.3.2 A ratio of 3.5 is considered to be the marker of an affordable housing market. That is, the ability to purchase is based on a mortgage 3.5 times gross income. The following information, based on DCLG Live tables, demonstrates that the ratio of average house price to average earnings in Suffolk Coastal has continuously exceeded this level and far exceeds the average across Suffolk.

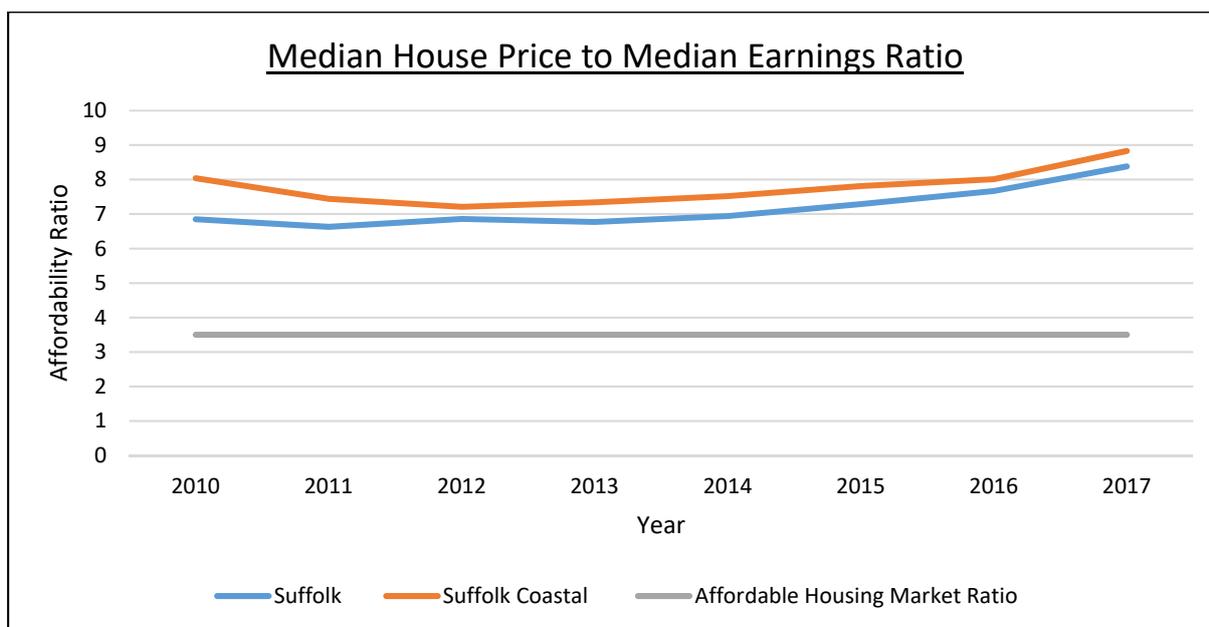


Figure 2: Median House Price to Median Earnings Ratio (Source: Shelter England<sup>3</sup>)

- 4.3.3 The 2018 house price to workplace-based earnings ratio were recently published at the end of March 2019 and indicate that this position has continued to worsen, with the ratio of median house price to median gross annual workplace-based earnings equating to 10.07<sup>4</sup>.
- 4.3.4 High house prices across Suffolk Coastal District mean that many people cannot afford to purchase or rent a house on the open market. The Strategic Housing Market Assessment (2017) identifies that within Suffolk Coastal, median property prices are higher than in the other parts of the Ipswich Housing Market Area.
- 4.3.5 The East Suffolk Housing Strategy (2017 – 2023) identifies the affordability of housing as a key challenge and includes an area of focus around having a more proactive role towards supporting the delivery of affordable housing in East Suffolk. The provision of affordable housing through the development of market housing is an integral part of the delivery of the East Suffolk Housing Strategy, including through investing commuted sums into additional affordable homes and achieving on-site affordable homes which provide the right mix of sizes and tenures to meet local need.

<sup>3</sup> Shelter England Databank - [https://england.shelter.org.uk/professional\\_resources/housing\\_databank/results?area\\_selection=42%2C42UG&data\\_selection=B1&selected\\_min=2010&selected\\_max=2018](https://england.shelter.org.uk/professional_resources/housing_databank/results?area_selection=42%2C42UG&data_selection=B1&selected_min=2010&selected_max=2018)

<sup>4</sup> ONS data set - <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowequartileandmedian>

4.3.6 It is therefore clear that the provision of both market housing and affordable housing on the Orwell Green Garden Village would be a significant benefit.

#### 4.4 The Need for Specialist Housing

4.4.1 At the time of publication, the Core Strategy outlined that Suffolk Coastal has an ageing population. At just over 21%, the district is home to a higher proportion of people who are aged over 65 than is found nationally or in Suffolk as a whole.

4.4.2 The emerging Local Plan reiterates this concern stating that;

**“Suffolk Coastal has one of the oldest populations of any district in the country and this characteristic places additional requirements on the Local Plan, service providers and infrastructure provision.”**

4.4.3 In particular, this ageing population creates a specific housing need.

4.4.4 The East Suffolk Housing Strategy recognises that there are an increasing number of older people living in housing that is too large or is not suited to their mobility needs. It states that there is a need for more housing to be adapted to make it accessible and for more specialist housing for older people, including higher level support for people with severe mobility problems, chronic physical health conditions and dementia.

4.4.5 The development of new housing provides an opportunity to design-in such considerations. Provision of smaller, more suitable, accommodation may result in more of the existing larger properties becoming available.

4.4.6 The SHMA includes an assessment of the needs for specialist accommodation (sheltered housing, enhanced sheltered housing and extra care housing) and identifies a need for a total of 1,287 units by 2036.

4.4.7 The emerging Local Plan proposes that opportunities should be taken to integrate older persons housing into the community, in order to address potential issues of isolation and to promote inclusivity. For example, older persons housing on sites that are well related to schools, community centres or other focal points can help to create integrated communities.

4.4.8 This application responds directly to the need for specialist housing through the proposal to include apartments with care. This will not only meet a specific local housing need, but also potentially aid the release of mainstream housing stock in Suffolk for other residents.

## 4.5 Why a Garden Village?

4.5.1 The concept of a Garden Village is not new. They have been a key part of Britain's development history however, there has been renewed interest in the idea of the 'Garden City', and how the principles that underpin the design ethos, can contribute to the supply of new homes.

4.5.2 Garden Cities are on a larger scale with many layers and constraints to address and will therefore be delivered over a long timeframe. Smaller scale developments of fewer than 500 dwellings have a limited scope to facilitate infrastructure projects that may be required to deliver wider improvements and benefits. By comparison, Garden Villages are an effective way to deliver housing within an appropriate timeframe and with a critical mass that will facilitate the delivery of infrastructure such as schools and road improvements, to the benefit of both the new and existing communities.

4.5.3 The NPPF (2019) continues to support Garden Villages as a sustainable means through which to deliver housing, stating at paragraph 72:

**“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities...”.**

4.5.4 It goes on to state that in doing so local authorities should:

**“Set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided.”.**

## 5 GARDEN VILLAGE PRINCIPLES

### 5.1 Introduction

5.1.1 The Government has identified new settlements as part of the solution to the housing crisis and its ambitious plans to deliver 300,000 homes a year by the mid-2020s.

5.1.2 The NPPF reiterates at paragraph 72 that;

**“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities...”**

5.1.3 In August 2018, the Government published the Garden Communities Prospectus which sets out their vision and expectations for high-quality place-making across the country. The prospectus also set out assessment criteria which schemes would be required to meet to be considered for government assistance.

### 5.2 Garden Community Qualities

5.2.1 The Orwell Green Garden Village presents a genuine and timely opportunity to deliver an exemplar development for the 21<sup>st</sup> Century drawing upon well planned, well designed and sustainable garden village principles. The assessment criteria are considered below.

#### **Scale**

5.2.2 The Government’s prospectus outlined that they will consider proposals for Garden Villages which should have between 1,500 and 10,000 dwellings.

5.2.3 Orwell Green Garden Village can deliver up to 2,700 dwellings, which is a quantum of development that can support and provide the necessary infrastructure, facilities and services required to sustain the development as a standalone settlement.

#### **Strategic Fit**

5.2.4 New garden communities should offer opportunities for significant long-term housing and economic growth in a local area.

- 5.2.5 These proposals fall within the Ipswich Strategic Planning Area. Ipswich has relatively tight administrative boundaries and there are cross boundary issues that are relevant to the development and future of the Borough, the urban area of Ipswich and surrounding areas.
- 5.2.6 Orwell Green Garden Village is strategically located to deliver a scheme which could assist in meeting the high level of housing required in this housing market area.
- 5.2.7 The various strategies across Suffolk focus upon Ipswich as the central hub with the surrounding areas identified as places with huge potential growth. They also identify the potential for enhancement of employment opportunities at Ransomes Europark to the south of this application.
- 5.2.8 Promoting a garden village development in this location fits well with the strategies proposed for Suffolk.

### **Locally Led**

- 5.2.9 Whilst Orwell Green Garden Village does not physically cross local authority boundaries, it does offer a suitable location to meet the future potential unmet housing needs and housing growth needs of the neighbouring Ipswich Borough Council.
- 5.2.10 Engagement with both East Suffolk and Ipswich Borough Council has been undertaken and will continue throughout the application process. Further engagement with wider stakeholders and the local community going forward will be crucial and it is our intention to ensure that this captures those in both Ipswich Borough and Suffolk Coastal District.

### **Garden Community Qualities**

- Clear Identity
- 5.2.11 The proposals will have a distinctive local identity by building upon the existing features of the site and using these as key design elements within the development.
- 5.2.12 A central village green space is integral to the Garden Village concept at Orwell Green, bringing community uses and the countryside into the heart of the scheme.
- Sustainable Scale
- 5.2.13 The extensive background work that has been undertaken to support this application has improved the understanding of the infrastructure both Orwell Green Garden Village and the wider area needs. Evidence to date confirms the land is unconstrained and is entirely suitable for the scale and form of development being proposed.

- Well-designed Places

5.2.14 Orwell Green Garden Village will create a high-quality mixed-use development that supports a range of local employment types and premises, retail opportunities, recreational and community facilities within a strong green infrastructure framework.

- Great Homes

5.2.15 The development will cater for a diverse mix of house types, sizes and tenures, with a strong emphasis on affordable housing including starter homes and key worker homes, as well as opportunities for individual and community self-builds.

5.2.16 The proposal also provides a variety of housing options for older people.

5.2.17 Overall, the development offers opportunities to promote a range of house builders to support both local and wider housing needs in Suffolk, in an area where there is identified market enthusiasm.

- Strong Local Vision & Engagement

5.2.18 A comprehensive programme of public engagement has been undertaken to ensure the existing local community, and future residents and businesses are involved in the design of the proposals from the outset.

5.2.19 This will help to ensure that the scheme fits with the local vision for the area. This is covered in more detail within the Statement of Community Involvement submitted as part of this application.

- Transport

5.2.20 The proposals will secure a sustainable, integrated and robust transport network, including a well-connected and accessible network of footpaths and cycle routes linking across the site and to the surrounding area.

5.2.21 The site already benefits from accessibility to high frequency bus services passing along Felixstowe Road. The site is large enough to generate significant patronage and it is likely that in the long term, existing routes could be diverted to serve the site or new services could be introduced.

- Healthy Places

5.2.22 The scheme has been designed to provide the choices and chances for all to live a healthy life through ensuring that elements, such as the sports pitches of various sizes and functions and existing recreational routes, are readily accessible, allowing people of all ages to participate in outdoor activity, resulting in healthy bodies and minds.

- Green Spaces

5.2.23 An extensive mix of parks and gardens, natural and semi-natural greenspace and amenity space will provide opportunities for recreation and relaxation on-site.

5.2.24 The new green areas proposed will create ecological enhancements, which will encourage the increase and variety of the biodiversity of the area.

- Legacy and Stewardship Arrangements

5.2.25 Through the coalition of key stakeholders, an effective governance structure will be considered from the outset of the project. A community management company with resident and stakeholder participation is envisaged, funded through an annual management charge and on-site funding sources. This will help to ensure that the longer-term success of the Orwell Green Garden Community is realised.

- Future Proofed

5.2.26 Orwell Green Garden Village will be a future-proofed development encompassing the latest in 'smart' living technology integrating the needs of energy independence, automated vehicles and digital commerce and to accommodate rapid social, economic change.

5.2.27 However, with technology and practical energy innovations advancing at pace, new opportunities are constantly coming forward. The proposals will be flexible to achieve the optimum sustainability credentials.

### **Deliverability and Viability**

5.2.28 The delivery of a new garden community is a complex, long-term project. The Orwell Green Garden Village is within the ownership of one landowner, which represents a significant benefit for delivery of the project.

5.2.29 The Orwell Green Garden Village can begin delivering dwellings from 2021 with all units being completed by 2039. This represents an average annual delivery rate across the Village of 150 dwellings from when construction commences in 2021. This delivery rate has assumed

multiple housebuilders on site at the same time delivering different house types and tenures within varying character areas, in order to provide market choice.

5.2.30 Naturally, there is an interdependency between the delivery of housing and the infrastructure that needs to be provided both in advance and alongside the development. It is considered that a viable proposition can be delivered.

5.2.31 There are a number of options as to how the delivery of the Garden Village could come forward. At this time, it is envisaged that a master developer will deliver the required infrastructure and serviced parcels of land for development by house builders. The master builder will oversee all development and help to ensure that it is successfully delivered.

5.2.32 Bringing the site forward with schools in place, improvements to the highway network and high-quality housing secured means social cohesion and a sense of place become part of the heart of the village. This would be established early in the development process and can continue to grow and prosper for generations to come.

### 5.3 Summary

5.3.1 Each project and location have their own specific context which means the garden city principles are not a blueprint for designing new garden villages but are key characteristics which can make garden villages successful.

5.3.2 The proposals for Orwell Green Garden Village have incorporated these key characteristics. Through a mix of housing, natural green open space and well connected, usable parcels of development with easy access to employment and a high level of local amenities, Orwell Green Garden Village will be a high quality, desirable community which can be enjoyed by all. The proposals for this new Garden Village include a plethora of benefits that will make this a desirable community for new residents to dwell.

## 6 THE DEVELOPMENT PLAN

### 6.1 Introduction

6.1.1 At the time of writing, the adopted Development Plan applicable to the site comprises:

- Core Strategy and Development Management Policies (July 2013)
- Site Allocations and Area Specific Policies (January 2017)
- Saved policies of the Suffolk Coastal Local Plan (1994, incorporating First and Second Alterations – 2001 & 2004)
- Area Action Plan for the Felixstowe Peninsula (January 2017)
- Minerals Core Strategy (September 2008)
- Waste Core Strategy (March 2011)

6.1.2 There are no relevant policies for this site included within the saved policies of the Suffolk Coastal District Local Plan, the Area Action Plan for the Felixstowe Peninsula nor the Waste Core Strategy and they are not considered further within this statement.

6.1.3 This section considers the remaining documents in the order they were produced.

### 6.2 Minerals Core Strategy (2008)

6.2.1 The Minerals and Waste Planning Authority have indicated within the EIA Scoping Response that the site lies within a Minerals Consultation Zone.

6.2.2 Paragraph 8.4.1 of the Minerals Core Strategy outlines that;

**“Geological mapping by the British Geological Survey (BGS) identifies broad areas of sand and gravel within Suffolk. However this is not evidence of a viable resource over a particular area, and viability can only be proven through drilling and/or test pits followed by analysis. MPS1 requires that proven mineral resources should not be sterilised needlessly by development and that Mineral Safeguarding Areas (MSAs) be accordingly identified. It is intended that in Suffolk Mineral Consultation Areas (MCAs) will be based entirely on (i.e. be contiguous with) MSAs. Suffolk’s MSAs/MCAs are shown on Map B.”**

6.2.3 Therefore, the site is considered to be located within a Mineral Safeguarding Zone. Policy 5 of the Minerals Core Strategy clarifies that the Minerals Planning Authority will object to development in excess of one hectare within these zones *“unless it can be shown that the sand*

*and gravel present is not of economic value, or that the mineral will be worked before the development takes place”.*

- 6.2.4 The application is supported by a Mineral Resource Assessment. This assessment outlines that the mineral on the site has a high sand content and low gravel content. This makes it commercially unattractive because the valuable component is gravel. In view of this composition, it is most unlikely that it would be a viable commercial standalone sand and gravel pit.
- 6.2.5 Furthermore, prior extraction on a large commercial scale is not practicable as it would need extraction and processing plant and in any event the developer would not have the commercial skills to do it.
- 6.2.6 Mineral extraction is a low margin business and the cost of excavation, haulage and double handling would probably make this an unviable activity.
- 6.2.7 Therefore, the requirements of Policy 5 of the Minerals Core Strategy have been addressed.

### 6.3 Core Strategy and Development Management Policies (2013)

- 6.3.1 The Core Strategy and Development Management Policies (Core Strategy) was adopted in July 2013. It is the first document produced as part of the Local Plan for the Suffolk Coastal area.
- 6.3.2 The Core Strategy sets out, in strategic terms, the Council's overall approach to future development for the period to 2027. It sets out the principles as to where development of different scales should take place and the key factors that will need to be taken into account when considering individual proposals.
- 6.3.3 The most important policies for determining this application are considered below, with a full consideration of all relevant policies included at Appendix 1.
- 6.3.4 **Strategic Policy SP1 – Sustainable Development** contains a series of criterion to assess the contribution that development proposals make to the achievement of sustainable development. In this regard, the application proposals would accord/ can accord with the relevant requirements of this policy;
- a. The Design and Access Statement submitted with the application details a range of energy efficiency measures that could be adopted at a future detailed design stage.

- b. The proposals would have access to a good range of services and facilities within acceptable walking distance of the site, with a number also proposed on-site. Existing bus routes could be diverted to serve the site subject to further discussions with local transport operators.
- c. The proposals will strike an appropriate balance between securing housing in an appropriate location close to existing employment opportunities and environmental capacity.
- d. The provision of appropriate infrastructure in order to support the existing and proposed community on-site can be satisfactorily addressed by way of proportionate developer contributions and conditions.
- e. The proposal will involve the development of a greenfield site. It is accepted by the Council that greenfield sites will require development to meet the identified housing need.
- f. The Design and Access Statement submitted with the application details a range of sustainable construction methods that could be adopted at a future detailed design stage.
- g. The development proposals are intended to create walkable communities on-site. Given the self-contained nature of the proposal, it follows that the off-site traffic generation would be lower than say, the provision of the same number of dwellings in smaller sites which do not have the potential for 'internal' travel.
- h. The proposals would give rise to a number of economic benefits which could support the wider Suffolk economy.
- i. The development is accompanied by several accessibility enhancements.
- j. The scheme can be developed without a significant impact on the natural environmental assets present in the locality.
- k. A sense of place can be addressed at the future detailed design stage, adopting the design principles described in the Design and Access Statement.
- l. The principles of the garden village development would help to create and promote an inclusive and sustainable community.

- 6.3.5 **Strategic Policy SP2 – Housing Numbers and Distribution** sets out that the Core Strategy will make provision for at least 7,900 new homes across the district in the period 2010 to 2027. The land for these new homes is to be distributed in accordance with the settlement hierarchy set out in the Core Strategy at policy SP19.
- 6.3.6 The policy also outlines the Council's intention to undertake an early review of the Core Strategy, commencing with the publication of an Issues and Options Report by 2015, at the latest. The review will identify the full, objectively assessed housing needs for the District and proposals to ensure that this is met in so far as this is consistent with policies in the NPPF.
- 6.3.7 The NPPF advises at paragraph 60 that strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. Based upon the new national standard methodology, using the illustrative figures published in September 2017, the baseline housing requirement for Suffolk Coastal district is 495 dwellings per annum. Applied to the period 2016 to 2036 this equates to 9,900 dwellings.
- 6.3.8 The emerging Local Plan Review promotes an annual figure of 545 dwellings, the equivalent of 10,900 dwellings over the period 2016 to 2036.
- 6.3.9 It is apparent that policy SP2 was not informed by the standard method calculation nor does it reflect existing assessments of housing need. Inspector Major considered that policy SP2 should attract no more than "limited weight" due to its unrealistic retention of a low housing requirement in the Woodbridge decision<sup>5</sup>.
- 6.3.10 This conclusion on weight to policy SP2 should still be drawn.
- 6.3.11 As shown in Map 1 of the Core Strategy, the site falls within the "Ipswich Policy Area". This means that the application site falls within the Eastern Ipswich Plan Area (EIPA), the "Major Centre" category in **Strategic Policy SP19 – Settlement Policy**. This is the top tier of the settlement hierarchy. The EIPA is allocated 29% of the total proposed housing growth in the District.
- 6.3.12 It is therefore apparent that the Council considered this to be the most sustainable location for further growth in the District.

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<sup>5</sup> APP/J3530/W/16/3165730 – paragraph 27.

6.3.13 This growth is to be accommodated through allocations for large scale housing and employment development to meet strategic needs, with the general location of these allocations identified in the Core Strategy.

6.3.14 The supporting text for Policy SP19 outlines at paragraph 4.12 that;

**“...At its southern end, it is well related to the Ransomes Europark employment and retail centre that lies just within Ipswich Borough. This part of the area is also relatively well served with public transport and includes the park and ride facility at Martlesham Heath providing access to Ipswich hospital, Ipswich town centre and Ipswich railway station.”**

6.3.15 The text then elaborates by stating that a single allocation of 2,000 new homes is identified, to the east of the A12 at Martlesham, to the south and east of Adastral Park. At paragraph 4.17 the Core Strategy confirms that; *“Longer term, it is likely that additional housing will need to be provided”*. This application proposal would be consistent with this intention.

6.3.16 However, **Strategic Policy SP20 – Eastern Ipswich Plan Area** outlines that the strategic approach to development in the Eastern Ipswich Plan Area can be divided into 3 sections:

- the area to be covered by the Martlesham, Newbourne & Waldringfield Area Action Plan;
- the main urban corridor of Kesgrave, Martlesham and Rushmere St Andrew;
- and the smaller settlements and countryside which surround these core areas.

6.3.17 The “countryside” is defined as all of the land that sits outside the physical limits boundaries of Major Centres, Market Towns, Key Service Centres and Local Service Centres as set out in the Settlement Hierarchy. The application site sits outside the defined physical limits boundaries.

6.3.18 **Strategic Policy SP29 – The Countryside** sets out that development in the “countryside” will be limited to that which of necessity requires to be located there and accords with other relevant policies within the Core Strategy (e.g. Policies SP7 or DM13); or would otherwise accord with special circumstances outlined in paragraph 55 of the National Planning Policy Framework (2012). **Development Management Policy DM3 – Housing in the Countryside** sets out the specific types of housing which would be allowed in the countryside.

6.3.19 The application proposals do not consist of development which of necessity requires to be located there, although it is arguable that this location is well-suited to a garden village development. Nor do the proposals accord with the special circumstances outlines in

- paragraph 55 of the NPPF (2012) such as for rural workers. Therefore, the proposals conflict with policy SP29 and DM3.
- 6.3.20 However, it is considered that, in the light of the higher housing need currently identified, the restriction of development in the countryside proposed in these policies is inconsistent with the NPPF (2019). The weight to be attached to these policies should be reduced and not considered determinative in terms of decision making.
- 6.3.21 **Strategic Policy SP9 – Retail Centres** details that no need has been proven requiring a new retail centre to be provided within the district. The policy wording does not restrict new retail proposals from being delivered.
- 6.3.22 This application proposal includes new retail space (1200sqm) provision on-site. This has been informed by a Retail Assessment which has been submitted as part of the application. The NPPF specifically advocates that planning decisions should encourage the opportunities presented by mixed-use developments to promote social interaction.
- 6.3.23 Whilst the application site is well located with suitable access to other retail centres such as Ransomes Europark, it is considered that providing local retail opportunities on-site would not only offer new employment opportunities but would also ensure that day-to-day retail needs would be secured on the development, thus creating a self-contained scheme.
- 6.3.24 This is considered to be a positive aspect of the proposals.
- 6.3.25 **Strategic Policy SP10 – A14 & A12** confirms that both the A14 and A12 are valuable routes providing links across the district. The policy outlines that improvements to the A12 south from its junction with the A1214 at Martlesham to the Seven Hills interchange will be required with funding provided by means of developer contributions.
- 6.3.26 The development proposals are well located to support the improvements referenced within this policy with the A12 bounding the site bounding to the east.
- 6.3.27 The A14 (Junction 58)/A12 interchange (also known as Seven Hills) comprises of a grade separated roundabout. Traffic signals will be introduced as part of a committed highway improvement associated with Brightwell Lakes. A further mitigation proposal is offered as part of this development which would provide additional capacity by allowing two lanes to exist around the interchange and join the A12 northbound.
- 6.3.28 The delivery of the development could provide funding towards the strategic infrastructure improvements proposed through developer contributions.

- 6.3.29 **Strategic Policy SP11 – Accessibility** sets out how the Council will work with developers to maximise the opportunities to be made by means other than private motor car. The policy outlines that in relation to public transport this will include improving both the quantity and quality of the service on offer.
- 6.3.30 High quality frequent bus services would be brought forward to connect the site with local employment opportunities, Ipswich Town Centre and surrounding communities. It is to be agreed with local transport operators and the local highways authority as to whether this service would be entirely new, a diverted service or replace an existing service. A possible route for the service is included in the Transport Assessment in this application submission. This additional service can be secured through a S106 agreement.
- 6.3.31 In relation to foot and cycle provision this will mean securing safe and easy access to local facilities where walking or cycling offers a realistic alternative for most people. There are a number of highly accessible public footpaths and bridleways present in the vicinity of the site. The local bridleways can be used to access Felixstowe Road from the southern site boundary.
- 6.3.32 Layout is a reserved matter; however, it is envisaged that the street types proposed would promote utilising sustainable transport modes through safe and convenient access to the principal cycle and highway network from residences on-site. This will ensure that the facilities proposed on-site will be easily accessible to both existing and new residents.
- 6.3.33 **Strategic Policy SP15 – Landscape and Townscape** states that the policy of the Council will be to protect and enhance the various landscape character areas within the district either through opportunities linked to development or through other strategies.
- 6.3.34 The policy also advises that the Council will seek to enhance and preserve attributes of the towns and villages which are of distinctive historical and architectural value. The policy continues;

**“This strategy will extend to towns and villages where sites, gaps, gardens and spaces that make an important contribution to a particular location in their undeveloped form will be identified and protected where known; or more generally avoided where development in these locations would lead to coalescence.**

**The location of such sites will be designated through the Site Allocations and Area Specific Policies, Area Action Plan or Neighbourhood Development Plan Document. Until then those sites currently allocated under “saved”**

**Policy AP28 in the Suffolk Coastal Local Plan (incorporating 1st and 2nd Alterations) will continue to be protected.”**

- 6.3.35 The site has not been designated as one of these protected locations within the referenced documents.
- 6.3.36 The application is supported by a Landscape and Visual Impact Assessment (with conclusions made at Appendix 6.2 and 6.3 of the Environmental Statement). This provides an appraisal of the visual and landscape character impacts of the proposed development.
- 6.3.37 The development would result in the loss of arable fields to residential development with a substantial area of new green infrastructure. Existing features of interest are to be retained and enhanced by the additional mitigation measures. The existing character of the Site and the immediate context is already influenced by the main roads and the facilities which are found within the suburban of Ipswich to the west.
- 6.3.38 Although the site is not within any designated landscape, the proposals recognise areas within the local landscape outside of the site which are more sensitive to change, such as Mill River Valley and the Suffolk Coast and Heaths AONB. It provides mitigation measures to ensure the setting for those designations are not affected by the Proposed Development. The green infrastructure proposals also have potential to provide opportunities to enhance the recreational opportunities and benefit the site’s biodiversity.
- 6.3.39 **Strategic Policy SP16 – Sport and Play** outlines that the appropriate provision, protection and enhancement of formal and informal sport and recreation facilities for all sectors of the community will be supported.
- 6.3.40 The policy confirms that the standard to be used in the calculation of play space (both children’s play areas and sports pitches) will be the national standard of 2.4 hectares per 1000 population.
- 6.3.41 A population of 6,200 (based on 2,700 dwellings proposed in the development) implies a requirement for 14.88 hectares of open space. The application proposes almost 27ha of open space and over 31ha of green links which would mitigate any demand placed on established facilities.
- 6.3.42 **Strategic Policy SP17 – Green Space** seeks to ensure that communities have well-managed access to green space within settlements and in the countryside in order to benefit health, community cohesion and greater understanding of the environment.

- 6.3.43 As part of the green infrastructure strategy proposed for this site, the application will secure 60.84 hectares of green space across the development proposal. This will be secured through a S106 agreement.
- 6.3.44 **Development Management Policy DM2 – Affordable Housing on Residential Sites** outlines that the Council will expect 1 in 3 units to be affordable housing. The application proposals will secure the provision of 33% affordable housing through a S106 agreement and therefore complies with this policy requirement.
- 6.3.45 **Development Management Policy DM27 – Biodiversity and Geodiversity** states that all developments should seek to protect biodiversity and geodiversity, maximise the opportunities to enhance connections of natural habitats, incorporate beneficial conservation features.
- 6.3.46 It sets out that development proposals that would cause a direct or indirect effect to the integrity of internationally and nationally designated environmental sites or other designated areas, priority habitats or protected/priority species will not be permitted unless: prevention, mitigation and, where appropriate, compensation measures are provided such that net impacts are reduced to a level below which the impacts no longer outweigh the benefits of the development.
- 6.3.47 The proposals include a significant amount of green infrastructure comprising 43% of the overall site. This includes a community park and the provision of a further 32.2 hectares of green links through the development which provide connectivity to the recreational resources outside of the site boundary. The design and functionality of this provision is primarily based on the requirements of a Suitable Alternative Natural Greenspace (SANG) which was originally adopted for the Thames Basin Heaths SPA. This ensures that areas of open space are provided with a natural feel with at least a 2.5km circular walk provided.
- 6.3.48 These habitats have been designed to include both the habitat retained within the site and those created by the proposals. This will ensure that the development protects biodiversity and maximises green links across the site.
- 6.3.49 The impact on designated sites has been assessed in detail both within the Information for Habitats Regulations Assessment and the ES Chapter on Biodiversity. Although there is significant green infrastructure provision on-site, it is accepted that the 'attraction' of a coastal habitat cannot be replicated with the development and therefore it is possible that some residents may drive to certain areas of the Stour and Orwell Ramsar/SPA/SSSI. Therefore, the proposals include additional avoidance measures to avoid potential likely significant effects

through the form of a financial contribution towards the Suffolk Coast HRA Recreation Avoidance and Mitigation Strategy (RAMS).

- 6.3.50 Through securing the financial contribution and on-site green infrastructure, measures will be provided such that net impacts are reduced to a level below which the impacts no longer outweigh the benefits of the development.

## 6.4 Site Allocations and Area Specific Policies (2017)

- 6.4.1 The Site Allocations and Area Specific Policies Document is a subsidiary or lower level Local Plan Document, the remit of which is to implement the Core Strategy, in particular in relation to the delivery of housing growth.

- 6.4.2 **Policy SSP1 – New Housing Delivery 2015 – 2027** sets out that in order to meet at least the minimum Core Strategy housing delivery new housing delivery should be provided, in accordance with Table 2 and lists the settlements with housing allocations.

- 6.4.3 As discussed earlier in this statement, the housing requirement set in the Core Strategy is not consistent with the NPPF as it does not reflect objectively assessed housing needs.

- 6.4.4 The physical limits boundaries have operated as a policy guide to development across the district. Inside the physical limits boundary there is a policy presumption that development is acceptable in principle. Outside the physical limits boundary, opportunities for housing development are considerably more limited as countryside policies of restraint will apply.

- 6.4.5 These boundaries were redrafted as part of the Site Allocations and Area Specific Policies Document to incorporate sites of 5 or more dwellings where the principle of housing has been accepted and new housing allocations.

- 6.4.6 The application site remains outside the physical limits boundaries. **Policy SSP2 – Physical Limits Boundaries** confirms that;

**“Proposals for new residential development outside physical limits boundaries will be strictly controlled in accordance with national planning policy guidance and the strategy for the countryside as set out in Core Strategy policy SP29.”**

- 6.4.7 The application of policy SP29 has been considered above.

## 6.5 Development Plan Summary

6.5.1 The proposals are in accordance with a number of environmental, design and technical development-management policies that can be considered up to date and are relevant to this application.

6.5.2 However, the Development Plan in place does not plan positively for future development to meet the objectively assessed needs of the District and is time expired. It is therefore considered that policies related to housing supply (SP2, SP29 and DM3) cannot be considered up-to-date and should be afforded reduced weight in the planning balance. It is considered that these are the most important policies for determining this application and consequently, the presumption in favour of sustainable development is engaged.

6.5.3 There are other material considerations including the NPPF which also require consideration.

## 7 THE EMERGING DEVELOPMENT PLAN

### 7.1 Introduction

7.1.1 In accordance with the commitment to undertake an early review, set down in policy SP2 of the Core Strategy, the Council is working on a Local Plan Review.

7.1.2 The current timetable for the Local Plan Review, as set out on the Council's website<sup>6</sup> is;

- Preparation of aligned/joint evidence base and consultation on the scope of the Sustainability Appraisal: January 2014 onwards
- Notify stakeholders and invite representations. Early consultation stage that involves consideration of issues and options/preferred options Oct 2016 – Jun 2018 (Issues and Options consultation, 18 August until 30 October 2017)
- First Draft Local Plan: Summer 2018
- Proposed Submission Plan (final draft plan) published for representations relating to soundness: Winter 2018
- Submission of plan for Examination by Planning Inspectorate: February 2019
- Examination hearing: June 2019
- Inspector's Report published: October 2019
- Adoption of plan by the Council: November/December 2019

### 7.2 Local Plan Review

7.2.1 At the Extraordinary Meeting of the Council on 3<sup>rd</sup> January 2019, the Council approved the Final Draft Local Plan for publication.

7.2.2 Following this decision, the Final Draft Local Plan was published for consultation over a 6-week period from 14<sup>th</sup> January until 25<sup>th</sup> February 2019.

7.2.3 The Final Draft Local Plan sets out the vision, spatial strategy, district wide policies and area specific strategies for the period 2018 to 2036. The document also identifies specific site allocations.

#### **Key Emerging Policies**

7.2.4 The plan outlines the strong functional relationship between Suffolk Coastal and the neighbouring authorities of Babergh, Ipswich, Mid Suffolk and Waveney. **Policy SCLP2.1**

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<sup>6</sup> <https://www.eastsuffolk.gov.uk/planning/local-plans/suffolk-coastal-local-plan/local-plan-review/>

**Growth in the Ipswich Strategic Planning Area** confirms that Suffolk Coastal will continue to play a key role in the economic growth of the area and will contribute to;

- a. The creation of at least 30,320 jobs through the provision of at least 49.8ha of employment land across the Ipswich Functional Economic Area;
- b. The collective delivery of at least 37,328 dwellings across the Ipswich Housing Market Area; and
- c. Supporting the continued role of Ipswich as County Town.

7.2.5 The site at Orwell Green is well located to support the commitments made in policy SCLP2.1 with good connections to Ipswich and the provision of 2,700 new homes.

7.2.6 **Policy SCLP3.1 Strategy for Growth in Suffolk Coastal District** sets out that the Council will deliver an ambitious plan for growth which includes the delivery of at least 582 dwellings per annum (at least 10,476 dwellings over the plan period) and between 4,100 - 5,000 sqm of convenience retail floorspace and between 7,700 – 13,100 sqm of comparison retail floorspace.

7.2.7 The policy continues to outline that the strategy for growth will seek to provide opportunities for economic growth and create and enhance sustainable and inclusive communities through the delivery of new Garden Neighbourhoods at North Felixstowe and South Saxmundham.

7.2.8 Updated settlement boundaries are proposed through **Policy SCLP3.3 Settlement Boundaries** to indicate where development for housing, employment and town centre development would be suitable. The policy outlines that proposals for new residential development outside of the Settlement Boundaries will be strictly controlled in accordance with national planning policy guidance and the strategy for the Countryside.

### 7.3 Gladman Representations to the Local Plan Review

7.3.1 Gladman have been engaged with the plan-making process and have submitted detailed representations to each stage of consultation.

7.3.2 These include comments seeking further clarification regarding the consideration of cross boundary planning issues, detailing how local plans are being aligned across the wider area and how the Duty to Cooperate is being met. In particular, to provide an explanation on how the development needs and economic growth potential of the wider area is being planned for within the emerging spatial strategy.

7.3.3 Gladman also highlighted the need for the re-consideration of the proposed approach not to allocate any a further strategic site to the East of Ipswich. The Orwell Green Garden Village proposal is well located in terms of employment, services and facilities and provides a significant and sustainable opportunity to assist the area in meeting its development needs over the plan period and beyond.

7.3.4 Its allocation within the Local Plan would comfortably form part of a truly sustainable vision and spatial strategy for the future of Suffolk Coastal District and the wider authorities of the Ipswich Strategic Planning Area. Indeed, to address the issues facing Suffolk Coastal District and its neighbouring authorities in a positive, sustainable and upfront manner, Gladman requested that the Council introduce a new policy into the Local Plan relating specifically to the allocation of Orwell Green Garden Village.

## 7.4 Weight to the Emerging Development Plan

7.4.1 Paragraph 48 of the Framework (2019) outlines that local planning authorities may give weight to relevant policies in emerging plans according to:

**“a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);**

**b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and**

**c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)”**

7.4.2 Whilst the LPP2 is continuing to progress through phases of consultation and examination, it is considered that it is not at an advanced stage of preparation. There also remain several unresolved objections. It is therefore considered that it cannot be afforded full weight in decision-taking.

## 8 SUSTAINABLE DEVELOPMENT: THE FRAMEWORK (2019)

### 8.1 Introduction

8.1.1 The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied.

8.1.2 Paragraph 2 of the Framework (2019) confirms that the National Planning Policy Framework *"is a material consideration in planning decisions."*

### 8.2 The Presumption in Favour of Sustainable Development

8.2.1 At the heart of the Framework is the *'presumption in favour of sustainable development'*, which should be used through plan-making and decision-taking (paragraph 10).

8.2.2 Paragraph 11 sets out for decision-taking this means:

**"c) approving development proposals that accord with an up-to-date development plan without delay; or**

**d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:**

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or**
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."**

8.2.3 The relevant technical reports that accompany this planning application demonstrate that there are no unacceptable adverse impacts that would significantly and demonstrably outweigh the benefits associated with the proposals. Further, the application site is not the subject of any of the designations cited within footnote 6 of the Framework (2019) and therefore policies do not apply which indicate the presumption should be disapplied.

8.2.4 This section describes how the development proposals meet the relevant objectives of the Framework (2019).

## 8.3 Delivering a Sufficient Supply of Homes

### **The Need for Market and Affordable Housing**

8.3.1 There is a wealth of evidence from figures at the highest levels of the Government, the Bank of England and internationally, within the European Commission and International Monetary Fund, which demonstrate that there is a consistent and pressing requirement to build more homes to meet the significant level of unmet need, particularly for homes that are affordable. In the foreword to the Housing White Paper, Prime Minister Theresa May stated:

**“Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable – particularly for ordinary working class people who are struggling to get by.**

**Today the average house costs almost eight times average earnings – an all-time record. As a result it is difficult to get on the housing ladder, and the proportion of people living in the private rented sector has doubled since 2000.”**

8.3.2 The delivery of 2,700 new homes is a significant benefit of these proposals. In addition to a pressing need for new market homes in District, there is also a significant need for affordable housing.

8.3.3 The UK has a persistent problem with inadequate housing supply, which has led to low income and middle-income families being priced out of the housing market. National Government recognise that house price inflation is getting to dangerous levels and that building new homes is necessary in order to address this issue. The delivery of 33% affordable homes should be given significant weight.

### **Identifying land for homes**

8.3.4 The Framework (2019) sets out the Government’s key housing objective, which is, *“to boost significantly the supply of housing”*.

8.3.5 Paragraph 72 confirms the Government’s awareness of the potential opportunities posed by Garden Villages, outlining that;

**“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or**

**significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.”**

8.3.6 Paragraph 73 sets out how LPAs should achieve this boost in the supply of housing, including a requirement to provide a delivery buffer of 5%, 10% or 20% to ensure choice and competition in the market for land.

8.3.7 The proposals entirely accord with this national policy objective in so far as the application will deliver new housing development which will assist the Council to contribute towards the central Government objective of boosting significantly the supply of housing now.

## 8.4 Building a Strong, Competitive Economy

8.4.1 The Framework (2019) is clear that the Government is committed to delivering sustainable economic growth identifying that planning policies should, *'set out a clear economic vision and strategy which positively and proactively encourage sustainable economic growth'* (paragraph 81).

8.4.2 Housing development is a key component of economic growth and this is fully recognised in Government policy and in the Housing White Paper – Fixing our broken housing market (2017), which states on page 15:

**“If we fail to build more homes, it will get ever harder for ordinary working people to afford a roof over their head, and the damage to the wider economy will get worse.”**

8.4.3 Through the development of the site a significant amount of investment will be made to the area in terms of the construction value of the project and associated spend during the construction period. The construction industry and house building in particular make an important contribution to both the local and national economy in terms of job creation.

8.4.4 Assuming the development operates full capacity and following benchmarks of the HCA Employment Densities Guide and professional judgement, it is estimated the development could provide employment space for 275 FTE jobs.

8.4.5 In addition, the Environmental Statement Chapter 13: Socio-Economics outlines that the construction of the development could result in 300 jobs per year in construction. This is a 13% increase at the district level.

8.4.6 Once complete, the new homes will also generate a significant amount of household expenditure per year. Based on 2,700 homes being completed it is estimated in the region of £78 million of household expenditure will be generated by the Proposed Development, of which, a proportion will be spent within the local economy.

8.4.7 The provision of quality housing at Orwell Green Garden Village will support the achievement of sustainable economic growth in the District and is fully supported by the requirements and advice of the Framework; indeed, paragraph 80 is clear that, *"significant weight should be placed on the need to support economic growth through the planning system"*.

## 8.5 Promoting Healthy and Safe Communities

8.5.1 Paragraph 91 of the Framework (2019) emphasises that decisions should aim to achieve healthy, inclusive and safe places.

8.5.2 The effect on the health and wellbeing of the population is considered within the Health Impact Assessment submitted with the application. The assessment notes that in order to maximise the positive effects and minimise those which may be negative, it will be important to implement the necessary plans identified in the assessment at the next stage of the application (for example, securing a Travel Plan and Surface Water Management Strategy).

8.5.3 Whilst detailed design is a matter reserved for future determination, the Design and Access Statement included in the application illustrates that a high standard of design could be achieved on the site and provides the basis for a design and development framework where a high-quality layout can be achieved.

8.5.4 This has included consideration of different elements of the design such as principles for the layout which would allow users to navigate the scheme but also design out opportunities for crime.

8.5.5 The proposed development will help provide a modern, well designed and high-quality environment within which to live and work that will help to meet current local shortfalls in education, housing, health service and recreation provisions. With the proposed provision in place, it is considered the proposed development will result in beneficial effects to the health of future residents, future users of the site, and existing residents.

## Open Space and Recreation

8.5.6 Paragraph 96 of the Framework (2019) outlines that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

8.5.7 The application proposes a multi-functional, linked network of green space created through the development. To the centre of the site of the site, the Village Green Hub provides an area for social activity with a cricket pitch, play areas, orchard, trim trail and easy access to the Neighbourhood Centre. To the south west, an area of open space provides extensive sports fields and Allotments. To the north west of the site is a Community Park with walking and cycle routes which criss-cross the Park and link into the wider site network.

8.5.8 These facilities will allow people of all ages to participate in outdoor activity, promoting a health and active lifestyle.

8.5.9 At paragraph 98 the Framework affirms that decisions should;

**“...protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.”**

8.5.10 Existing Public Rights of Way form the basis for a network of potential cycle and footpath links across the site, promoting sustainable transport through easy and accessible routes. An existing bridleway on-site known as ‘The Greenway’ is proposed to be retained and form a pedestrian /cycle route spine through the centre of the site.

8.5.11 This existing route will be supplemented with new routes including a circular walk around the entire perimeter of the site, linking into the wider existing footpath links both to the north and south.

## 8.6 Promoting Sustainable Transport

8.6.1 At paragraph 102, the Framework (2019) requires local planning authorities to consider transport issues from the earliest stages of the plan making process and development proposals, so that:

**“...opportunities to promote walking, cycling and public transport use are identified and pursued...”**

8.6.2 At paragraph 103, the Framework requires significant development to:

**“...be focused on locations which are or can be made sustainable, the limited the need to travel and offering a genuine choice of transport modes...”**

- 8.6.3 Orwell Green Garden Village proposes a network of community facilities, including two primary schools, shops, a local centre (and market square), village green, sports park, play areas, allotments and community orchards. Links between the facilities will provide a well-connected village and promote sustainable travel. All facilities on the site are located to be easily accessible to residents either on foot or by bicycle.
- 8.6.4 The bus stops located closest to the site are situated along Felixstowe Road and are served by six different bus services. The site is large enough to generate significant patronage and it is likely that in the long term, existing routes could be diverted to serve the site or new services could be introduced.
- 8.6.5 High quality frequent bus services can be secured on-site with local transport operators and the local highways authority.
- 8.6.6 The A14 (Junction 58)/A12 interchange (also known as Seven Hills) comprises of a grade separated roundabout. Traffic signals will be introduced as part of a committed highway improvement associated with Brightwell Lakes. A further mitigation proposal is offered as part of these proposals which would provide additional capacity by allowing two lanes to exist around the interchange and join the A12 northbound.
- 8.6.7 A further mitigation proposal at the St Augustine roundabout is also proposed which would result in substantial improvements in junction performance.
- 8.6.8 Paragraph 108 requires that safe and suitable access to the site can be achieved for all users.
- 8.6.9 A roundabout junction on the A12 is proposed as the main access to the site. Two secondary roundabout accesses are proposed off Bucklesham Road, providing access to both the northern and southern parcels of the site.
- 8.6.10 The Transport Assessment confirms that following the delivery of the proposed mitigation, traffic conditions are predicted to improve, even with the inclusion of development traffic. Assessed traffic impacts elsewhere have been shown to be immaterial. On the basis of the detailed junction assessment work, it can be concluded that there is no conflict with the requirements of the Framework.

## 8.7 Making Effective Use of Land

- 8.7.1 Paragraph 117 of the Framework (2019) states that;

**“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions...”**

8.7.2 The application proposals provide a suitable location for housing development and would be an effective use of the land. The proposals also accord with paragraph 118 as they would offer opportunities to achieve net environmental gains by both enabling new habitat creation and improving public access to open space, not previously available.

8.7.3 The average net density of the proposals is 36 dwellings per hectare. However, the Design and Access Statement confirms that the density will vary across the site with higher densities along the Spine Street to lower densities towards the peripheral areas.

## 8.8 Achieving Well-Designed Places

8.8.1 Paragraph 124 of the Framework (2019) outlines that;

**“...Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities...”**

8.8.2 The Design and Access Statement demonstrates how the scheme will deliver a high quality residential sustainable development. The proposals are based on sound design principles that have taken into account site constraints and opportunities presented by the site.

8.8.3 Whilst design is a matter reserved for future determination, the Design and Access Statement demonstrates the site could accommodate a scheme that would be in scale and character with its surroundings through delivering dwellings of a suitable size and through utilising materials that reflect the local vernacular. The illustrative masterplan seeks to create an attractive place that responds to the attributes of the site and the local context.

8.8.4 The development has been designed taking into account the recommendations of the Landscape and Visual Impact Assessment.

8.8.5 The green infrastructure within the built development will sit as an integral part of the framework and is key in creating an accessible, open and engaging place within which to live. The proposal provides a strong green framework comprising;

- The creation of a 17.6 ha Community Park;
- Village Green & Cricket Pitch;

- A Community Orchard;
- Allotments;
- New Buffer Planting;
- Play Areas; and,
- Attenuation Basins.

## 8.9 Meeting the Challenge of Climate Change, Flooding and Coastal Change

8.9.1 The Framework (2019) emphasises at paragraph 148 that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.

### **Flood Risk**

8.9.2 Paragraph 163 outlines that;

**“When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:**

**a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;**

**b) the development is appropriately flood resistant and resilient;**

**c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;**

**d) any residual risk can be safely managed; and**

**e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan. ”**

8.9.3 The application includes a site-specific Flood Risk Assessment which demonstrates how the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

- 8.9.4 The site is wholly located within Flood Zone 1. The sustainable drainage strategy proposed for this site includes the use of infiltration basins to which surface water runoff from the site will be conveyed towards from developable areas.
- 8.9.5 The Flood Risk Assessment demonstrates that the proposed development would be operated with minimal risk from flooding and, would not increase flood risk elsewhere.

## 8.10 Conserving and Enhancing the Natural Environment

- 8.10.1 Planning decisions should contribute to and enhance the natural and local environment.
- 8.10.2 The site is not subject to any landscape quality designation and lies outside of the Green Belt. The site, nor the immediate landscape, contains any rare or unusual landscape features and therefore it is considered that the site does not comprise a valued landscape.
- 8.10.3 The site consists of two parcels of lands which are open, large-scaled arable fields. The elements within the local landscape such as low-density residential properties, employment sites and the showground to the west contributing to the urban-fringe character. The main transport infrastructures surrounding the Site also influence local character and create robust and logical development boundaries separating the Site from the south and the east.
- 8.10.4 Chapter 6 of the Environmental Statement confirms that from a visual perspective, the actual number of receptors of high susceptibility to change that have clear views of the Site are limited in their extent, and that the visual envelope of the site is comparatively limited in its extent. The combination of the features within the existing landscape and the proposed landscape mitigations will help to contain and limit visibility of the proposed development from receptors.
- 8.10.5 The site and immediate landscape have the ability to absorb development of the type and scale proposed. Impacts on landscape character and landscape features have been factored into the design of the proposed scheme and mitigation measures. It is judged that at the outset on the completion of the proposed development there would be a high magnitude of landscape change on the site as would be expected for any large-scale development on a greenfield site. However, the design and mitigation approaches adopted will reduce the impact and there would not be any unacceptable long-term harm on landscape character.

### **Habitats and Biodiversity**

- 8.10.6 Paragraph 175 of the Framework outlines that;

**“d) Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.”**

- 8.10.7 The Ecological Appraisal submitted with the application confirms that there are opportunities to provide biodiversity benefits across the site such as through the management of a range of habitats within the Community Park.
- 8.10.8 The dominant habitat across the site is intensively managed arable land. The ecological importance of the dominant habitats within the site are of low ecological value.
- 8.10.9 The detailed survey work and assessment have concluded that the habitats within the site do not represent ‘functionality linked land’ required to maintain the favourable conservation status of designated species from the surrounding Stour and Orwell Estuaries and Deben Estuary and the proposals will not directly affect the conservation status of these designated sites.
- 8.10.10 Survey work for other protected species identified several species of bats using the site for foraging and commuting but this activity is largely restricted to boundary hedgerows / areas of plantation woodland. A small population of common lizard was identified adjacent to the A14 and a notable assemblage of invertebrates is associated with the veteran trees.
- 8.10.11 The proposals have retained the key habitats used by these species and where affected the proposals provide appropriate mitigation / compensation.
- 8.10.12 The community park proposed on-site will include biodiversity enhancements to compensate for habitat losses during construction. Measures will be taken to strengthen existing features such as hedgerows, but also to create new habitat features including trees, hedgerows, rich and tussock grassland and wetlands.
- 8.10.13 Paragraph 177 of the Framework (2019) outlines that

**“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”**

- 8.10.14 This application includes an Information for Habitats Regulations Assessment which provides further detail on the potential impact on the integrity of the designated sites.
- 8.10.15 The assessment concludes that through the payment of a financial contribution towards the RAMS, as well as the additional opportunities for recreation on the site itself, the proposals would not have a significant effect on any European designated sites.

### **Ground Conditions and Pollution**

- 8.10.16 Paragraph 180 of the Framework (2019) states;

**“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development...”**

- 8.10.17 The main continuous source of noise within the site was observed to be from the A12 and A14, with Bucklesham Road also making significant contributions to the noise climate within the site. An acoustic barrier abutting sections of the southern and eastern site boundary to screen future occupants from road traffic noise is proposed to help mitigate this noise.
- 8.10.18 The assessment of construction noise and vibration at the closest non-residential receptor to the site boundary demonstrated that lowest observed adverse effect levels were unlikely to be exceeded, therefore a significant effect is considered to be unlikely.
- 8.10.19 Additionally, significant effects from construction vibration are unlikely given the relatively large distance between non-residential receptors and any mechanised works.
- 8.10.20 The construction contractor will still be expected to produce and implement a construction noise and vibration management plan, which can be conditioned, to ensure that potential noise and vibration impacts would be minimised.
- 8.10.21 With the implementation of a noise and vibration management plan, the residual effects of construction noise and vibration are likely to remain as not significant.
- 8.10.22 Similarly, concentrations of PM<sub>10</sub> and PM<sub>2.5</sub> are predicted to be well below the air quality objectives for all receptors within the Proposed Development. Further measures to mitigate dust emissions are proposed during the construction phase of the development.

8.10.23 Overall, the environmental chapters conclude that there would not be a significant impact on air quality or noise from the development.

## 8.11 Conserving and Enhancing the Historic Environment

8.11.1 Section 16 of the Framework (2019) provides policy guidance on the conservation and investigation of heritage assets.

8.11.2 The Built Heritage Statement included in the application outlines that due to the topography, existing built environment and lack of inter-visibility between the site and the designated heritage assets, development on the site would result in no harm to the significance of the identified heritage assets (the Grade II listed The Forge, The Old Rectory and The White House, or to the Grade II\* Church of St Mary).

8.11.3 The Archaeological Desk-Based Assessment draws upon information from the Suffolk Historic Environment Record (SHER), Historic England as well as historic mapping and relevant secondary sources and archaeological reports. An archaeological geophysical survey was also undertaken across the whole Site and the results of this have also been considered.

8.11.4 The assessment found that there is a high archaeological potential for archaeological remains to be present within the site. The requirement for further archaeological work has been identified through the assessment.

8.11.5 It is considered that any archaeological interest in the site can be dealt with by appropriately worded planning condition.

## 8.12 Summary

8.12.1 From the above, it is clear that the application proposal complies with relevant provisions of the Framework (2019).

8.12.2 The assessment against the relevant policies does not indicate any circumstances under which permission should be restricted which might result in the disapplication of the presumption in favour of sustainable development.

## 9 PLANNING BALANCE AND CONCLUSIONS

### 9.1 Summary of Case and Identified Benefits and Harm

- 9.1.1 This outline planning application is made in the context of the Government's requirement to boost housing land supply and the presumption in favour of sustainable development.
- 9.1.2 This proposal for a new garden village in Suffolk is an effective way to deliver housing within an appropriate time frame and with a critical mass that will facilitate the delivery of infrastructure such as schools, health centres and transport improvements to the benefit of new and existing communities.
- 9.1.3 The application proposals will support the Council in meeting their identified market and affordable housing needs in the Borough.
- 9.1.4 There are further significant economic, social and environmental benefits that arise from permitting development on this site. The development proposals will clearly amount to well-planned and beneficial sustainable development in accordance with the Framework.
- 9.1.5 The supporting material, assessments and reports demonstrate that there are no technical or environmental constraints that would preclude the development of this site, subject to planning conditions and/or obligations. Gladman is willing to enter constructive dialogue with the Council to agree a list of conditions and S106 Heads of Terms that are necessary to make the development acceptable in planning terms.
- 9.1.6 The proposals are in accordance with several environmental, design and technical development-management policies that can be considered up to date and are relevant to this application.
- 9.1.7 However, the Development Plan in place does not plan positively for future development to meet the objectively assessed needs of the District and is time expired. It is therefore considered that policies related to housing supply (SP2, SP29 and DM3) cannot be considered up-to-date and should be afforded reduced weight in the planning balance. It is considered that these are the most important policies for determining this application and consequently, the presumption in favour of sustainable development is engaged.
- 9.1.8 There are other material considerations including the NPPF which also require consideration.

9.1.9 The key material considerations in this case are:

- The spatial strategy outlined in the Core Strategy is out-of-date and is failing to achieve the level of housing required.
- 2,700 dwellings can be delivered on-site, with a diverse mix of sizes, types and tenures to meet local housing needs.
- 33% of these dwellings will be “affordable housing” for which there is an identified substantial unmet need.
- 70 dwellings of extra-care will also be delivered which will not only meet a specific local housing need, but also potentially aid the release of mainstream housing stock in Suffolk for other residents.
- The site proposals represent a viable proposition that can be delivered.
- The proposals are strategically well located within East Suffolk district, but on the outskirts of Ipswich Town, to provide housing which could offer a longer-term housing strategy to address the future needs of the wider housing market area.
- The garden village proposals present an ideal opportunity to create a self-sufficient new settlement which includes key local infrastructure including two primary schools, sports and play facilities, a medical centre, a supermarket and other smaller retail units.
- The development will include the provision of strong green infrastructure including a new community park.
- There are identifiable and tangible benefits in terms of job creation and financial benefits resulting from the construction and occupation of the development.
- The site is not of high environmental value, nor within the Green Belt or AONB.
- The development will result in a high quality, well designed proposal which retains and enhances key landscape features.

## 9.2 Benefits and Harms

9.2.1 The table below considers some of the key benefits and harms arising in respect of the application proposal.

Benefit	Harm
<b>Social</b>	
Provision of a significant level of market housing (1,809 dwellings) to help address emerging identified housing need in East Suffolk.	None.
Provision of 33% affordable housing (891 dwellings) in a Borough where there is a significant identified need.	
Provision of 70 extra-care apartments which will not only meet a specific local housing need, but also potentially aid the release of mainstream housing stock in Suffolk for other residents.	
Provision of new formal and informal open spaces providing a range of recreational benefits for both new and existing residents.	
A Community Park is proposed located to the west of the site which will offer space for informal recreation promoting social interaction in a green space.	
New sports facilities including a cricket pitch and new sports pitches are proposed which will increase the opportunities for sport and physical activity as part of the proposals.	
New recreational provision in the form of three locally equipped areas for play are	

<p>proposed across the site will maximise accessibility to residents and offer inclusive opportunities for toddler, child and teenage play.</p>	
<p>The proposals include a strong new Neighbourhood Centre which will incorporate Retail Units, Healthcare, Community Building (Function Room/ Bar) and Office Space, creating a central hub which will offer a range of community facilities to residents both of the site and the surrounding area.</p>	
<p>The proposals will widen the choice of education facilities through the provision of two primary schools with two form entry and room for future expansion.</p>	
<p>The development also offers access to healthier food through on-site allotments and a community orchard.</p>	
<p>6,200 new residents to support local facilities and services in East Suffolk.</p>	
<b>Environmental</b>	
<p>New sustainable drainage system features are included in the proposals which will be designed to maximise landscape and biodiversity benefits.</p>	<p>There will be three new points of access into the proposed development requiring the removal of relatively short sections of hedges and a small number of trees.</p> <p>Tree removals to facilitate the access points are of low to very modest arboricultural value to the extent that they should not hinder the highway design of the junctions and can be justifiably mitigated for within a future approved landscape scheme.</p>

<p>New areas of proposed public open space provide ecological enhancements, incorporating areas of new landscaping and wildflower meadow.</p>	<p>The scheme would result in the loss of agricultural land resources by permanently removing 126.7 ha of BMV land.</p>
<p>New tree and hedgerow planting are proposed to enhance existing vegetation along the site's boundaries, creating an attractive, soft landscaped edge to the site.</p>	<p>The attraction of a coastal habitat cannot be replicated within the site and therefore it is possible that the new residents could result in increased recreation at the designated sites.</p> <p>Through a financial contribution towards the RAMS, as well as the additional opportunities for recreation on the development itself, it can be concluded that the proposals will not have a likely significant effect on any European designated sites.</p>
<p>A resultant net gain in biodiversity through new planting and landscaping.</p>	<p>The development has the potential to change noise baseline conditions due to associated changes in road traffic flows on the surrounding road network.</p> <p>Noise mitigation in the form of an acoustic barrier will assist in screening future occupants from road traffic noise.</p>
	<p>There would be an initial major adverse impact upon the landscape character of the site and immediate context, however this would reduce over time with the additional mitigation measures proposed such as the extensive green infrastructure.</p>
<b>Economic</b>	
<p>Construction employment of up to 300 jobs in a year.</p>	<p>None.</p>

275 FTE jobs based on the on-site employment space.	
Additional resident expenditure of £78 million.	

9.2.2 It is apparent that there are several significant benefits which weigh in favour of the proposals, which cross over the three overarching objectives of sustainable development. There are no adverse impacts identified which would significantly and demonstrably outweigh the benefits.

### 9.3 Planning Balance and Conclusions

9.3.1 The Framework (2019) policies on the delivery of sustainable housing development carry significant weight. The delivery of the proposed development would support housing and economic development objectives and meet the aims and objectives of sustainable development, securing net gains across all three strands of sustainable development (economic, social and environmental).

9.3.2 There are no technical or environmental impacts that would significantly or demonstrably outweigh the substantial benefits of the proposal and specific policies of the Framework (2019) and Development Plan do not indicate that development should be restricted.

9.3.3 When assessed against the provisions of the Framework the development proposal clearly constitutes 'sustainable development' and accordingly, should be approved without delay.

## APPENDIX 1: POLICY CONFORMITY TABLE

### Introduction

The tables within this appendix outline compliance with relevant detailed policy matters contained within the adopted Development Plan.

### Suffolk Coastal Core Strategy & Development Management Policies

Policy	Comment	Compliance?
<b>Strategic Policies SP1 – Sustainability Development</b>	<p>Policy SP1 outlines the importance of the delivery of sustainable development, and the strategy which Suffolk Coastal will employ to ensure that the development that is delivered is sustainable.</p> <p>The proposed development is compliant with the strategy for sustainable development, as the development fulfils all three strands of sustainable development, as identified within the planning statement and the socio-economic report which supports the application. As covered in more detail in the Planning Statement the application proposals would accord/ can accord with the relevant requirements of this policy.</p>	<p>✓</p>
<b>Policy SP1A – Presumption in Favour of Sustainable development</b>	<p>Policy SP1A states that the Council will take a positive approach that reflects the presumption in favour of sustainable development and proactively work with applicants to secure sustainable development.</p> <p>The policy states that the development plan will always be the starting point for determining an application, however where there are no relevant policies, or the policy is out of date, permission will be granted unless material considerations indicate otherwise.</p>	<p>✓</p>

	<p>The Planning Statement outlines the accordance with the development plan policies and assesses the benefits of the development against the impacts. It is considered that policy SP2 is out-of-date and therefore the presumption is engaged.</p> <p>The conclusion from the planning balance assessment has been that there are no unacceptable adverse impacts that would significantly and demonstrably outweigh the benefits associated with the proposals.</p>	
<p><b>Strategic Policy SP2 – Housing Numbers and Distribution</b></p>	<p>Policy SP2 states that 7,900 new homes across the district between 2010 -2027, of which will be distributed in accordance with the settlement hierarchy (SP19). The provision of housing will be done by allocation of housing sites, and through windfalls. The policy states that an early review of the housing numbers and the Objectively Assessed Need will be published in an issues and options report by 2015.</p> <p>The site will deliver up to 2,700 dwellings in Orwell Green Garden Village, which lies within the Eastern Ipswich Plan Area which has a requirement of 2,320 dwellings out of a total 7,900 homes. However, given that the housing figures are not based upon an up-to-date objectively assessed need, limited weight should be given to the policy.</p> <p>The emerging Local Plan Review promotes an annual figure of 545 dwellings, the equivalent of 10,900 dwellings over the period 2016 to 2036.</p> <p>It is apparent that policy SP2 was not informed by the standard method calculation nor does it reflect existing assessments of housing need. Inspector Major considered that policy SP2 should attract no more than “limited weight” due to its unrealistic retention of a low housing requirement in the Woodbridge decision.</p>	<p>X</p>

<p><b>Strategic Policy SP3 – New Homes</b></p>	<p>Policy SP3 outlines the Council’s strategy to increase the stock of housing to provide for the full range of size, type and tenure of accommodation to meet the needs of the existing and future population.</p> <p>The proposal will aim to provide up to 2,700 dwellings, within a sustainable location. Whilst the final mix of housing is for future determination, the scheme envisages a mix of size, types and tenures across the site, ranging from 1 bed apartments to 5 bed detached houses.</p>	<p>✓</p>
<p><b>Strategic Policy SP7 – Economic Development in the Rural Areas</b></p>	<p>Opportunities to maximise the economic potential of the rural areas, particularly where this will secure employment locally, will be generally supported.</p> <p>The proposal will provide 400 sqm of B1 office space as well as retail units in the rural area, this will provide local employment on-site.</p>	<p>✓</p>
<p><b>Strategic Policy SP9 – Retail Centres</b></p>	<p>Policy SP9 states that there will be an emphasis on maintaining and enhancing the viability of town centres.</p> <p>The application proposes a 400 sqm single large retail unit and 8 small retail units (100sqm each). This has been informed by a Retail Assessment which has been submitted as part of the application and demonstrates the need for retail provision.</p>	<p>✓</p>
<p><b>Strategic Policy SP10 – A14 &amp; A12</b></p>	<p>Policy SP10 outlines the importance of movement along the A14 and A12. The A12 is located to the north of the site. The policy states that developer contributions may be required to improve junctions of the A12.</p> <p>A transport assessment has been submitted with the application which undertakes a detailed assessment of the junctions which would have a potential impact. The development proposals are well located to support the improvements referenced within this policy with the A12 bounding the site bounding to the east.</p>	<p>✓</p>

	<p>The A14 (Junction 58)/A12 interchange (also known as Seven Hills) comprises of a grade separated roundabout. Traffic signals will be introduced as part of a committed highway improvement associated with Brightwell Lakes. A further mitigation proposal is offered as part of this development which would provide additional capacity by allowing two lanes to exist around the interchange and join the A12 northbound.</p> <p>The delivery of the development could provide funding towards the strategic infrastructure improvements proposed through developer contributions.</p>	
<p><b>Strategic Policy SP11 – Accessibility</b></p>	<p>Policy SP11 states outlines the Council’s strategy to improve the public transport network and reduce the reliance on the private car. The policy states that the developers must seek to maximise the opportunities for local journeys to be made by public transport.</p> <p>The site already benefits from high frequency bus services, passing on the A14/A12. The existing bus services are proposed to be diverted into the site and new services initiated subject to discussions with the bus operators. A Transport Assessment and Travel Plan has been submitted with the application which demonstrate the good links to the bus service and train station.</p>	<p>✓</p>
<p><b>Strategic Policy SP12 – Climate Change</b></p>	<p>SP12 states that the Council will seek to reduce the effects of new developments on Climate Change.</p> <p>The approach proposed in this application towards the mitigation of the effects of new development on climate change are detailed within the Design and Access Statement and Flood Risk Assessment. Whilst some of these elements will be subject to detailed design, it is apparent that the proposals are capable of supporting these objectives.</p>	<p>✓</p>

<p><b>Strategic Policy SP14 – Biodiversity and Geodiversity</b></p>	<p>Policy SP14 outlines that the Council will aim to protect and enhance the designated sites, and protected species.</p> <p>The Biodiversity Chapter of the ES confirms that the potential adverse effects of the development can be addressed through embedded mitigation coming forward as part of the development proposals, notably the creation of the community park, which will operate as a Suitable Alternative Natural Green Space.</p> <p>The application where possible seeks to enhance the habitats of protected species and retain existing wildlife corridors.</p>	<p>✓</p>
<p><b>Strategic Policy SP15 – Landscape and Townscape</b></p>	<p>Policy SP15 outlines that the Council will aim to protect landscape character areas, and the historical and architectural value of the towns and villages.</p> <p>The application site does not fall within any of the specifically identified protected landscapes referenced in the policy (AONB, designated parks and gardens etc). The application is supported by a Landscape and Visual Appraisal. This document provides an appraisal of the visual and landscape character impacts of the proposed development and illustrates that the effects have been minimised through the appropriate design of the proposals.</p>	<p>✓</p>
<p><b>Strategic Policy SP16 – Sport and Play</b></p>	<p>Policy SP16 states that appropriate provision of formal and informal sport and recreation facilities should be provided to support the community. Open space should be provided in accordance with national standards.</p> <p>The application seeks to provide almost 27 ha of open space and over 31ha of green links which would mitigate any demand placed on established facilities. This would include a community park, sports pitches, village green with cricket pitch, community orchard, allotments and children’s play area.</p>	<p>✓</p>

<b>Strategic Policy SP17 – Green Space</b>	<p>Policy SP17 outlines that the Council will seek well managed Green Space to be provided as part of any new development.</p> <p>As part of the green infrastructure strategy proposed for this site, the application will secure 60.84 hectares of green space across the development proposal. This will be secured through a S106 agreement.</p>	✓
<b>Strategic Policy SP18 – Infrastructure</b>	<p>Policy SP18 states that development which require infrastructure to deliver the new development, must be provided at the required stage of development.</p> <p>The recent adoption of the CIL accounts for the delivery of infrastructure, however where a contribution is required which is not included within the CIL list, this could be secured through a S106 agreement therefore the development is within accordance with the policy.</p>	✓
<b>Strategic Policy SP19 – Settlement Policy</b>	<p>Policy SP19 identifies Eastern Ipswich Plan Area – as a major centre that can accommodate 29% of overall housing growth.</p> <p>As shown in Map 1 of the Core Strategy, the site falls within the “Ipswich Policy Area”. This means that the application site falls within the Eastern Ipswich Plan Area (EIPA), the “Major Centre” category in Strategic Policy SP19 – Settlement Policy. This is the top tier of the settlement hierarchy. The EIPA is allocated 29% of the total proposed housing growth in the District. The application accords with the spatial strategy of the policy SP19.</p>	✓
<b>Settlement Policy SP20 – Eastern Ipswich Plan Area</b>	<p>The strategic approach to development in the Eastern Ipswich Plan Area can be divided into 3 sections – the area to be covered by the Martlesham, Newbourne &amp; Waldringfield Area Action Plan; the main urban corridor of Kesgrave, Martlesham and Rushmere St Andrew; and the smaller settlements and countryside which surround</p>	✓

	<p>these core areas.</p> <p>The "countryside" is defined as all of the land that sits outside the physical limits boundaries of Major Centres, Market Towns, Key Service Centres and Local Service Centres as set out in the Settlement Hierarchy. The application site sits outside the defined physical limits boundaries and therefore falls in this category.</p>	
<p><b>Strategic Policy SP29 – The Countryside</b></p>	<p>The strategy in respect of new development outside the physical limits of those settlements defined as Major Centres, Towns, Key and Local Service Centres or in accordance with Policy SP28, is that it will be limited to that which of necessity requires to be located there and accords with other relevant policies within the Core Strategy (e.g. Policies SP7 or DM13); or would otherwise accord with special circumstances outlined in paragraph 55 of the National Planning Policy Framework.</p> <p>*Development Management Policy DM3 – Housing in the Countryside sets out the specific types of housing which would be allowed in the countryside.</p> <p>The application proposals do not consist of development which of necessity requires to be located there, although it is arguable that this location is well-suited to a garden village development. Nor do the proposals accord with the special circumstances outlines in paragraph 55 of the NPPF (2012) such as for rural workers.</p> <p>However, it is considered that, in the light of the higher housing need currently identified, the restriction of development in the countryside proposed in these policies is inconsistent with the NPPF. The weight to be attached to these policies should be reduced and not considered determinative in terms of decision making.</p>	<p>X</p>

<p><b>Development Management Policy DM2 – Affordable Housing on Residential Sites</b></p>	<p>Policy DM2 outlines that new residential development should provide 1 in 3 units to be affordable.</p> <p>The proposal accords with the policy and proposes to provide 33% affordable housing (891 units).</p>	<p>✓</p>
<p><b>Development Management Policy DM3 – Housing in the Countryside</b></p>	<p>New housing will firstly and primarily be directed to, and integrated within, the settlements for which physical limits boundaries have been defined or in accordance with Policy SP19. In the interests of safeguarding the countryside as set out in Policy SP29 as well as meeting sustainable objectives, new housing in the countryside will be allowed where it comprises:</p> <ul style="list-style-type: none"> <li>(a) Replacement dwellings on a one to one basis where they are no more visually intrusive in the countryside than the building to be replaced;</li> <li>(b) The sub-division of an existing larger dwelling where this would meet a local need;</li> <li>(c) Affordable housing on ‘exception’ sites in accordance with Policy DM1;</li> <li>(d) Conversions of existing buildings subject to certain controls (Policy DM13);</li> <li>(e) Minor infilling within clusters of dwellings well related to existing sustainable settlements (Policy DM4); or</li> <li>(f) Development which would otherwise accord with the special circumstances outlined in paragraph 55 of the National Planning Policy Framework.</li> </ul> <p>The application proposals do not consist of development which of necessity requires to be located there, although it is arguable that this location is well-suited to a garden village development. Nor do the proposals accord with the special circumstances outlines in paragraph 55 of the NPPF (2012) such as for rural workers.</p>	<p>X</p>

	<p>However, it is considered that, in the light of the higher housing need currently identified, the restriction of development in the countryside proposed in these policies is inconsistent with the NPPF (2019). The weight to be attached to these policies should be reduced and not considered determinative in terms of decision making.</p>	
<p><b>Development Management</b> <b>Policy DM19 – Parking Standards</b></p>	<p>Policy DM19 outlines that new development should comply with the parking standards set out within the supplementary planning document.</p> <p>The parking standards required have been considered within the illustrative design and can be accommodated within the scheme, however the details of the parking will be agreed at reserved matters stage.</p>	✓
<p><b>Development Management</b> <b>Policy DM20 – Travel Plans</b></p>	<p>Policy DM20 states that new development that would have implications on transport, should be supported by a 'green travel plan'.</p> <p>A Travel Plan has been submitted as part of the application.</p>	✓
<p><b>Development Management</b> <b>Policy DM21 – Design: Aesthetics</b></p>	<p>Policy DM21 sets out that development will be expected to establish a strong sense of place, using streetscenes and buildings to create attractive and comfortable places to live, work and visit. The policy then outlines a set of criteria which development is required to meet to be permitted.</p> <p>The application is supported by a Design and Access Statement which demonstrates that these different criteria have been considered in the illustrative design of the proposals and could be accommodated within the proposed development.</p>	✓

<p><b>Development Management</b> <b>Policy DM22 – Design:</b> <b>Function</b></p>	<p>Policy DM22 requires proposals to make provision for their functional requirements.</p> <p>The application is supported by a Design and Access Statement which demonstrates that these different criteria have been considered in the illustrative design of the proposals and could be accommodated within the proposed development.</p>	✓
<p><b>Development Management</b> <b>Policy DM23 – Residential</b> <b>Amenity</b></p>	<p>Policy DM23 sets out that when considering the impact of new development on residential amenity, the Council will have regard to privacy/overlooking, outlook, access to daylight and sunlight, noise and disturbance, the resulting physical relationship with other properties, light spillage, air quality and other forms of pollution and safety and security. Development will be acceptable where it would not cause an unacceptable loss of amenity to adjoining or future occupiers of the development.</p> <p>The proposals will not result in an unacceptable loss of amenity to adjoining or future occupiers of the development, as demonstrated through the various application documents including the landscape and views, noise and air quality environmental chapters.</p>	✓
<p><b>Development Management</b> <b>Policy DM24 –</b> <b>Sustainable Construction</b></p>	<p>Policy DM24 sets out that residential development should meet at least Code Level 5 of the Code for Sustainable Homes to secure sustainable construction.</p> <p>The development proposals will be constructed using the guiding principles for sustainable design and construction set out in the Design and Access Statement.</p>	✓
<p><b>Development Management</b> <b>Policy DM25 – Art</b></p>	<p>Policy DM25 sets out that the Council will seek the provision of new publicly accessible works of art from major development.</p>	✓

	<p>The provision of publicly accessible works of art can be secured as part of a S106 agreement with the Council which will also detail their future maintenance, where appropriate.</p>	
<p><b>Development Management</b> <b>Policy DM26 – Lighting</b></p>	<p>Policy DM26 sets out that the Council will seek to minimise light pollution.</p> <p>The detail of the lighting of the proposals will be dealt with in future reserved matters applications but can be designed to ensure that light pollution from the scheme is minimised.</p>	✓
<p><b>Development Management</b> <b>Policy DM27 – Biodiversity and Geodiversity</b></p>	<p>Policy DM27 states that all developments should seek to protect biodiversity and geodiversity, maximise the opportunities to enhance connections of natural habitats, incorporate beneficial conservation features. It sets out that development proposals that would cause a direct or indirect effect to the integrity of internationally and nationally designated environmental sites or other designated areas, priority habitats or protected/priority species will not be permitted unless: prevention, mitigation and, where appropriate, compensation measures are provided such that net impacts are reduced to a level below which the impacts no longer outweigh the benefits of the development</p> <p>The proposed development seeks to protect and enhance habitats onsite through retaining the key ecological assets such as the existing trees and hedgerows where possible and supplementing them with additional planting. The impact on designated sites has been assessed in detail both within the Information for Habitats Regulations Assessment and the ES Chapter on Biodiversity. The proposals include significant on-site green infrastructure and a financial contribution towards the Suffolk Coast HRA Recreation Avoidance and Mitigation Strategy (RAMS). These measures will reduce net impacts to a level below which these impacts no longer outweigh the benefits of the development.</p>	✓

<p><b>Development Management</b> <b>Policy DM28 – Flood Risk</b></p>	<p>Policy DM28 states that housing developments outside the development limits will not be permitted if located within Flood Zone 2 and 3.</p> <p>The application site is located within an area designated by the Environment Agency as Flood Zone 1.</p>	<p>✓</p>
<p><b>Development Management</b> <b>Policy DM32 – Sport and Play</b></p>	<p>Proposals for new facilities for sport and play will be considered in relation to the character of the location, the scale of the settlement, the impact on landscape and townscape, access provision, highway safety and residential amenity.</p> <p>The proposals include the provision of sports pitches and changing facilities and Village Green with Cricket Pitch and Community Orchard (1.69ha). The Design and Access Statement outlines how they are suitably sited within the proposal and will be an appropriate addition to the garden village proposal.</p>	<p>✓</p>
<p><b>Development Management</b> <b>Policy DM33 – Allotments</b></p>	<p>The District Council will encourage the provision of new allotments in order to meet any demand that might be identified.</p> <p>The proposed development will provide 1ha of allotments as part of the application.</p>	<p>✓</p>

**Minerals Core Strategy (2008)**

<p><b>Policy 5 – Safeguarding mineral resources</b></p>	<p>Policy 5 outlines that the clarifies that the Minerals Planning Authority will object to development in excess of one hectare within these zones unless it can be shown that the sand and gravel present is not of economic value, or that the mineral will be worked before the development takes place.</p> <p>The application is supported by a Mineral Resource Assessment. This assessment outlines that the mineral on the site has a high sand content and low gravel content. This makes it commercially unattractive because the valuable component is gravel. In view of this composition, it is most unlikely that it would be a viable commercial standalone sand and gravel pit. The on-site material has been demonstrated to not be of economic value.</p>	<p>✓</p>
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\* There are no relevant policies for this site included within the saved policies of the Suffolk Coastal District Local Plan, the Area Action Plan for the Felixstowe Peninsula nor the Waste Core Strategy and they are not considered further within this statement.