



Woodbridge Town Council

Shire Hall Market Hill Woodbridge Suffolk IP12 4LP

Town Clerk: Mr G E Diaper

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To Members of the Planning Committee

Cllr Adelson

Cllr Bale

Cllr Blois

Cllr Holdcroft

Cllr Page

Cllr Mapey

Cllr Miller

Cllr Sanders

Cllr Sutton

Cllr Walsh

You are hereby summoned to attend a **meeting** of the **Planning Committee** to be held at the **John Gibbons Gallery, The Longshed, Tide Mill Way** on **Tuesday 18th January** at **5pm**

Greg Diaper

Town Clerk

11th January 2022

Public Attendance

Members of the public and press are welcome to join this meeting. Members of the public will be invited to give their views/questions the Town Council on issues on the agenda or raise issues for consideration or inclusion at future meetings. This item will be limited to fifteen minutes duration but may be extended at the discretion of the Mayor.

Agenda

1. Apologies

To receive apologies for absence.

2. Declaration of Interest

Members and officers are invited to make any declarations of Disclosable Pecuniary or Local Non-Pecuniary Interests that they may have in relation to items on the Agenda and are also reminded to make any declarations at any stage during the meeting if it becomes apparent that this may be required when a particular item or issue is considered.

3. Requests for Dispensation

Councillors with a Pecuniary Interest in an item on this Agenda, who wish to remain, speak, and/or vote during consideration of that item, may apply for a dispensation in writing to the Town Clerk prior to the meeting. Applications may also be considered at the meeting itself should the nature of the interest become apparent to a Councillor at the time of the meeting.

4. Confirmation of Planning Committee Minutes

To confirm the minutes of the Planning Committee held on 4th January 2022.

5. Public Question Time

For the public to ask questions of the Council or raise issues for consideration at a future meeting of the Council. 15 minutes maximum.

6. To note intentions to undertake works to trees in the conservation area

7. To comment on applications to trees with a Tree Preservation Order (TPO)

8. To comment on applications for planning permission

9. To further comment on application DC/21/5180/FUL – Land between 15 and 17 Beech Way

10. To note East Suffolk Council decisions on Planning Applications where those decision are contrary to this Council's recommendations and not previously reported

11. Closure

Woodbridge Town Council

Minutes of the meeting of the **Planning Committee** held at the **John Gibbons Gallery, The Longshed,** on **Tuesday 4th January 2022** at **7pm**

Councillors:

Present: D Adelson, S Bale, G Holdcroft, S Miller, C Page, M Sutton, R Sanders, C Walsh

Apologies: Lady C Blois

Absent without apologies C Mapey

In Attendance: Town Clerk, P Gillard and no members of the public.

631. Apologies for Absence

Apologies for absence had been received from Councillor Blois.

632. To receive Declarations of Interest

No members made any Declarations of Disclosable Pecuniary or Local Non-Pecuniary Interests in relation to items on the agenda.

633. To consider requests for Dispensations

There were no requests from Councillors with a Pecuniary Interest in an item on this Agenda for a dispensation.

634. To agree and approve the Minutes of the meeting held on 14th December 2021

The minutes of the Planning Committee meeting held 14th November 2021 were approved.

635. Public Question Time

There were no members of the public present.

636. To discuss the Council's response to the Draft Cycling and Walking Strategy

The Chair summarised the report produced by the Cycling and Walking strategy working party. Members of the working party were thanked for their efforts in producing the report.

With a number of approved changes to be made by the Chair, it agreed that the report produced by the working party would be submitted as the Council's response to the East Suffolk Council consultation on the Draft Cycling and Walking Strategy. The full submission is attached at Appendix 1.

The report would be made public via the Council's website and copies sent to Suffolk County Council Highways Officers working the 20mph scheme.

637. To note intentions to undertake works to trees in the Conservation Area

No applications during this period.

638. To review and comment upon removal of TPO tree

No applications during this period.

639. To comment on applications for planning permission

The Council agreed their comments as set out below:-

Application No and Address	Committee Comments
DC/21/5531/FUL - 8 Kingston Farm Road	We recommend APPROVAL
DC/21/5462/FUL - 26 Cherry Tree Road	We recommend APPROVAL
DC/21/5180/FUL - Land Between 15 And 17 Beech Way	<p>We recommend REFUSAL and urge the full East Suffolk Council Planning Committee (South) consider this application and that officer discretion is not the chosen assessment approach.</p> <p>This application contravenes Policy SCLP10.1 of the Suffolk Coastal Local Plan which states 'Development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity through the creation of new habitats and green infrastructure and improvement to linkages between habitats, such as wildlife corridors and habitat 'stepping stones'.</p> <p>The ecology appraisal by the applicant is preliminary only and, whilst noting numerous potential habitats for</p>

	<p>species, does not include any site-specific survey information on the presence or otherwise of species or wildlife corridors. This application thus does not demonstrate its impact on the existing green infrastructure network or on biodiversity. It does not follow the hierarchy of mitigation as detailed in the policy as it fails to define what it is mitigating against.</p> <p>The site lies within countryside outside the settlement boundary of Woodbridge and should only be considered for development if it meets specific needs of the community. The proposed housing mix is not in line with the known housing requirements of Woodbridge. Woodbridge has ample four-bedroom properties however supply of social housing, starter homes and homes for those on lower incomes is substantially exceeded by demand – potential development of this site should only be considered if it provides for these requirements.</p> <p>We are also concerned about the effect of light pollution on the nearby Suffolk Coasts and Heaths AONB River Deben SSSI/SPA, as the proposed properties are in clear line of sight from the river path and beyond with large windows facing that direction.</p>
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640. To note East Suffolk Council decisions on planning applications where those decisions are contrary to this Council’s recommendations and not previously reported.

The Committee noted that applications DC/21/3667/FUL - Pinecrest 5 Pytches Road, and DC/21/4773/FUL - 3A Thoroughfare, had been approved by officer delegated decision despite being refused by this Committee.

The Town Clerk was asked to request that District Councillors Mapey and Yule attend meetings of the Planning Committee to discuss the Planning process at East Suffolk Council and to more fully understand the basis of our refusals to certain applications.

The Town Clerk was also asked to contact Councillor Mapey and request he attend more meetings of the Planning Committee as his input would be extremely beneficial to the decision making of this Committee.

641. Closure

The meeting was closed at 8.23pm.

Councillor Sanders
Chair

DRAFT

WTC Comments on East Suffolk Council ('ESC') Draft Cycling and Walking Strategy Document

Planning Committee Approved

Introduction

The following comments are to be added to the comment boxes in the online consultation document at the various relevant positions provided therein for general comments and comments on each specific route. Document referred to herein as attachment are to be added to the attachment box to each comment section.

General Comments

Woodbridge Town Council ('WTC') has reviewed the draft strategy in the light of the data collected by ESC and WTC councillors' knowledge of the use by cyclists and walkers of roads and footways within Woodbridge and its immediate environs.

Further WTC has taken into consideration the following:

- The likely significant impact of the current design being finalised on its behalf by Suffolk County Council Highways for several 20mph zones within the town boundaries as well as the likely increasing of the speed limit by SCC along the B1438 between the A12 and the junction with Old Barrack Road/California from 30 to 40mph.
- The likely significant impact of the SCC proposed A12 improvements between Seven Hills and Woods Lane, specifically the revision to junctions at the three roundabouts on the outskirts of Woodbridge and the dualling of the single lane section between the B1438 and B1079 junctions.

WTC, in its review of the consultation, has also examined the ESC proposals based on its belief that IM 15 and 17 should be the primary strategic route for cyclists travelling from Ipswich/Kesgrave/Martlesham to Woodbridge and/or Melton. WTC is of the view that further cycling accesses into Woodbridge can be added from IM17 which provide an alternative option that may better meet the core design objectives in section 4 of the Department of Transport LTN1/20 than some of the routes in the ESC draft strategy. These will be commented upon in detail under the comments section for individual routes.

Route IM 15 – Crown Point to Sandy Lane

Whilst this route is not within Woodbridge, it is the single proposed access route to Woodbridge along the strategy's Ipswich to Melton corridor. It is fundamental to increasing cycle traffic between Kesgrave/Martlesham and Woodbridge/Melton. Woodbridge Town Council ('WTC') thus consider the route should be recategorized as very high priority.

WTC consider it is crucial to make this section more attractive for cycle use as it is a part of longer distance inter community access.

The highway has a significant volume of vehicular traffic. The current southbound only, non-segregated, road painted cycle lane from Sandy Lane to Crown Point works satisfactorily but there is no similar northbound lane. WTC recommend that a similar lane is added northbound

and that a local 20mph limit be introduced from just west of Crown Point to just east of the Bealings Road with signs also indicating cycle lane presence to make this section safer for use both along it, and at the junctions which have significant vehicular junction movements. WTC recognises that further improvements would be difficult to incorporate.

North of Bealings Road to Sandy Lane WTC believe that a segregated cycle path and footway should be incorporated on the eastern side of the highway as available land and minimal vehicle access off that side of the highway occur. This section has higher foot traffic due to circular walks associated with Martlesham Creek. WTC consider the development of IM16 as a walking route will increase this foot traffic markedly.

Route IM 16 – Sandy Lane

Woodbridge Town Council ('WTC') agrees this is a very high priority route and agree a modal filter at the railway is appropriate. WTC support this route.

The section west of the railway bridge is a single-track highway with passing places and will continue to have frequent commercial vehicular traffic including lorries as there are a numerous businesses along it. The steeply sloping banks, flat gradient and highway unevenness leads to drainage issues i.e., puddles during and after rain. It is thus unattractive as a walking route. WTC believe it will remain so unless a segregated footway is added. WTC recommend this is on the northbound side as there are minimal vehicles accessing across that side of the highway.

North of the railway there will remain limited commercial traffic along the route to service the horticultural premises near the railway with increasing residential traffic north of Dukes Park. North of Dukes Park the narrow highway has short sightlines and lack of footways up to Broomheath. WTC believe this could be improved with a white-lined unsegregated combined cycle and walking lane.

The junction with the Ipswich Road is unattractive for Woodbridge bound cyclists from a safety perspective. Further, for walkers along Ipswich Road to/from the west it is necessary to traverse, between this position and 20 Ipswich Road, from the north side footway to the south side footway to walk on a footway into Woodbridge. For these reasons WTC recommend a crossing arrangement for cyclists and walkers be added at the Sandy Lane/Ipswich Road junction to encourage use.

Finally, WTC recommend this route be lit with low level lighting where there is no current streetlighting.

Route IM 17 – Outer Woodbridge

Woodbridge Town Council ('WTC') consider IM 17 should be the primary strategic route for cyclists travelling to/from Ipswich Kesgrave/Martlesham to/from Woodbridge and Melton. As such it should be recategorized as very high priority and is supported by WTC.

WTC recommend ESC examine further new links to this route from Woodbridge to aid access. Specifically, WTC's view is a new route via Clare Avenue and Warren Hill Road and Ipswich Road/Cumberland Street and Cherry Tree Road would be particularly attractive to walkers and cyclists. (see attachment). It would have less issues than the proposed route IM 18.. The section of Ipswich Road/Cumberland Street that is the B1438 is currently being assessed with SCC to be a 20mph zone.

IM 17 between Seckford Hall Road and B1079 roundabout could usefully be diverted for much of its length onto the access track behind Peterhouse Crescent which extends all the way to

Bilney Road rather than being immediately alongside the A12. It would be more attractive and safer being more remote from the A12. There would be minimal impact on the mature trees than the ESC proposed route beside the A12 would have. This current access track is little used and unattractive with some fly tipping. It also has a track linking it to Peterhouse Crescent directly in line Clare Avenue.

WTC consider the section of IM 17 from the B1079 to Hasketon Road will be particularly difficult to improve to make it safer. There are numerous vehicular crossings to properties, a parking area and the entrance/exit from the Shell filling station along this stretch. Driver's attention will remain more on joining/leaving the A12 than on cyclists or walkers. It would be an unattractive section of IM 17 which may impact use of this route. WTC recommend that this section be removed and the bulk of proposed IM 21 forms part of the IM 17 route.

WTC request consideration is given at the B1079, or close by, for IM 17 to include access for cyclist and walkers to the west of the A12 particularly to the garden centre and associated businesses. WTC suggest ESC incorporate a crossing at this location in its strategy. WTC note a crossing at this location may form part of SCC's A12 improvements proposals.

Whilst outside the boundary of Woodbridge, WTC consider ESC will have considerable difficulty with incorporating a cycle lane down Woods Lane given the recent new footway is sub-standard in width, due to land constraints and the highway is sub-standard in width. An alternative route linking to IM 22 via Warwick Avenue and Bredfield Road should be considered.

Attachment to add to comment box



Route IM 18 – Sandy Lane to Woodbridge Station

Woodbridge Town Council ('WTC') has numerous concerns with this route, that the strategy designates as very high priority. WTC does not support this route. The route is proposed as a lit segregated track which, if compliant with Department of Transport IT1/20 design guidelines would be a minimum of 4m wide. WTC see the following specific issues.

- The route traverses the southern edge of Porters Wood over a significant length. It will require removal of numerous trees in an area of woodland used and valued by a large number of Woodbridge residents.

- The route has severe gradients at the top of the valley slope which would be unattractive to both cycle riders and walkers unless slackened by significant earthworks.
- The route from halfway down the valley slope and along the western edge of the railway is prone to flooding. The government surface flooding map (see attached) show a high risk of flooding. Additional maps at <https://check-long-term-flood-risk.service.gov.uk/map> also show this section of the route has high risk flood water velocities and depths of floodwater between 300 and locally over 900mm, also deemed high risk. WTC consider substantial earthworks and drainage works would be essential to make this a safe route.
- The fields are grazed by cattle; fencing, gates and crossings would be essential.
- The routes traverses Kingston Field. The Field is constrained by covenant to recreational use only within the land transfer to WTC. Further the alignment of the route conflicts with the current use of the area specifically
 - WTC's developing proposals for a community garden,
 - the new basketball area
 - the mini football area
 - cuts across the entrance to the highly used children's playground
 - cuts across the entrance to the Pavilion,
 - would require a number of mature trees to be removed close to Jetty Lane,
 - fails to incorporate use of the new crossing to Jetty Lane taking a technically difficult and unacceptable alignment across the entrance to the allotments.
- WTC have concerns about the safety of a cycle track that traverse the heavily used Station car park where there is considerable foot traffic crossing the proposed track alignment.

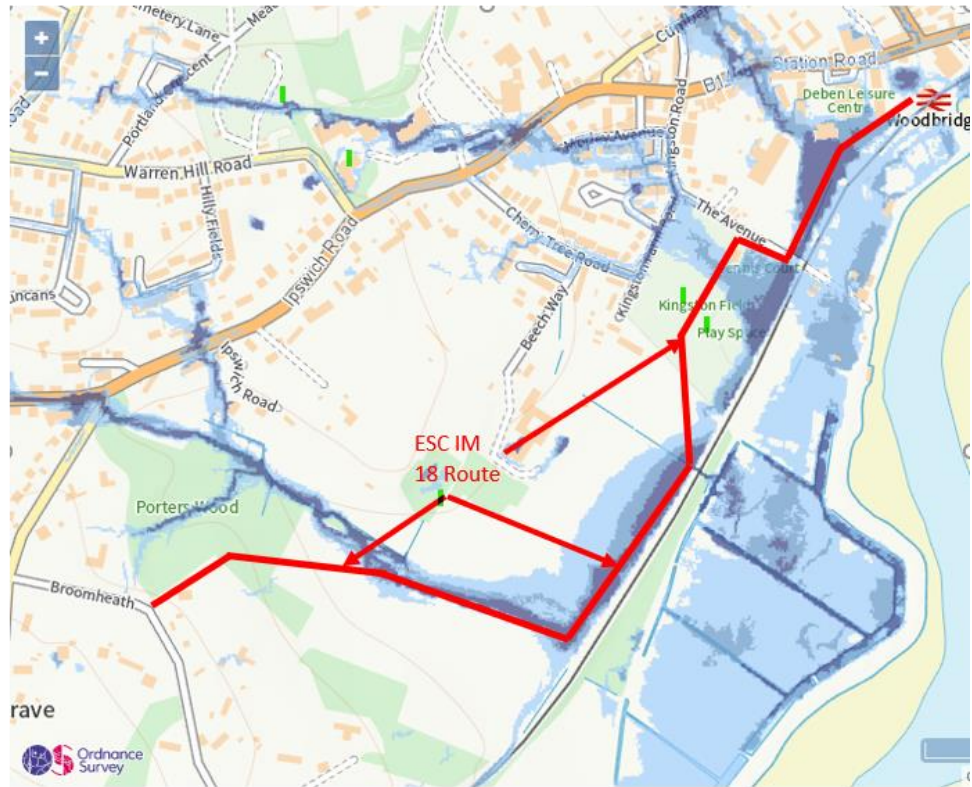
Further the development of this proposed route would be costly in terms of land purchase and engineering works required.

WTC consider the aims of IM18 may be better met by use of IM 17 and a new route using Clare Avenue, Warren Hill Road and Cherry Tree Way as discussed in our comments on IM 17.

WTC is also of the view that given the likely cost of IM 18, if ESC consider there should be an link from IM 16 into the town centre/railway station, then re-modelling of the Ipswich Road from Sandy Lane to Cherry Tree Road to incorporate a segregated cycling and walking route would be more appropriate and less damaging.

Attachments to add to comment box

Flooding Issues on ESC Proposed IM 18 Route



Extent of flooding from surface water

● High
 ● Medium
 ● Low
 Very Low
 ⊕ Location you selected

Route IM 19 – California to Quay Street

Woodbridge Town Council ('WTC') is of the opinion that this route is unlikely to be successful in attracting cyclists and walkers. It is far from direct and has the following other unattractive features

- The crossing of Ipswich Road is at location with considerable vehicular traffic movements both along, and on and off, Ipswich Road posing risks to cycling and walking users.
- The section along the east side of Fen Meadow is too steep for cyclists and ends in a blind corner with Fen Walk.
- To have adequate width the current attractive tree and hedge lined path along the east side of Fen Meadow would be severely impacted
- The section along Fen Walk cannot be widened to provide adequate width.
- The ESC alternative proposal to using Fen Walk, taking the route through the Abbey junior school grounds and entrance, has safeguarding issues

WTC however consider the proposals for Quay Street and Cumberland Street have considerable merit. If combined with the alternative route we propose in our comments on IM 17 these aspects of the route would be welcomed.

If ESC wishes to continue to develop this route WTC recommend that the section from Warren Hill Road to Cumberland Street is amended to use the full length of Warren Hill Road and then Ipswich Road to Cumberland Street.

Route IM 20 – Thoroughfare/Melton Road

Woodbridge Town Council's ('WTC') view is that a route between the centre of Woodbridge and Melton should be very high priority and not high priority as the draft strategy proposes.

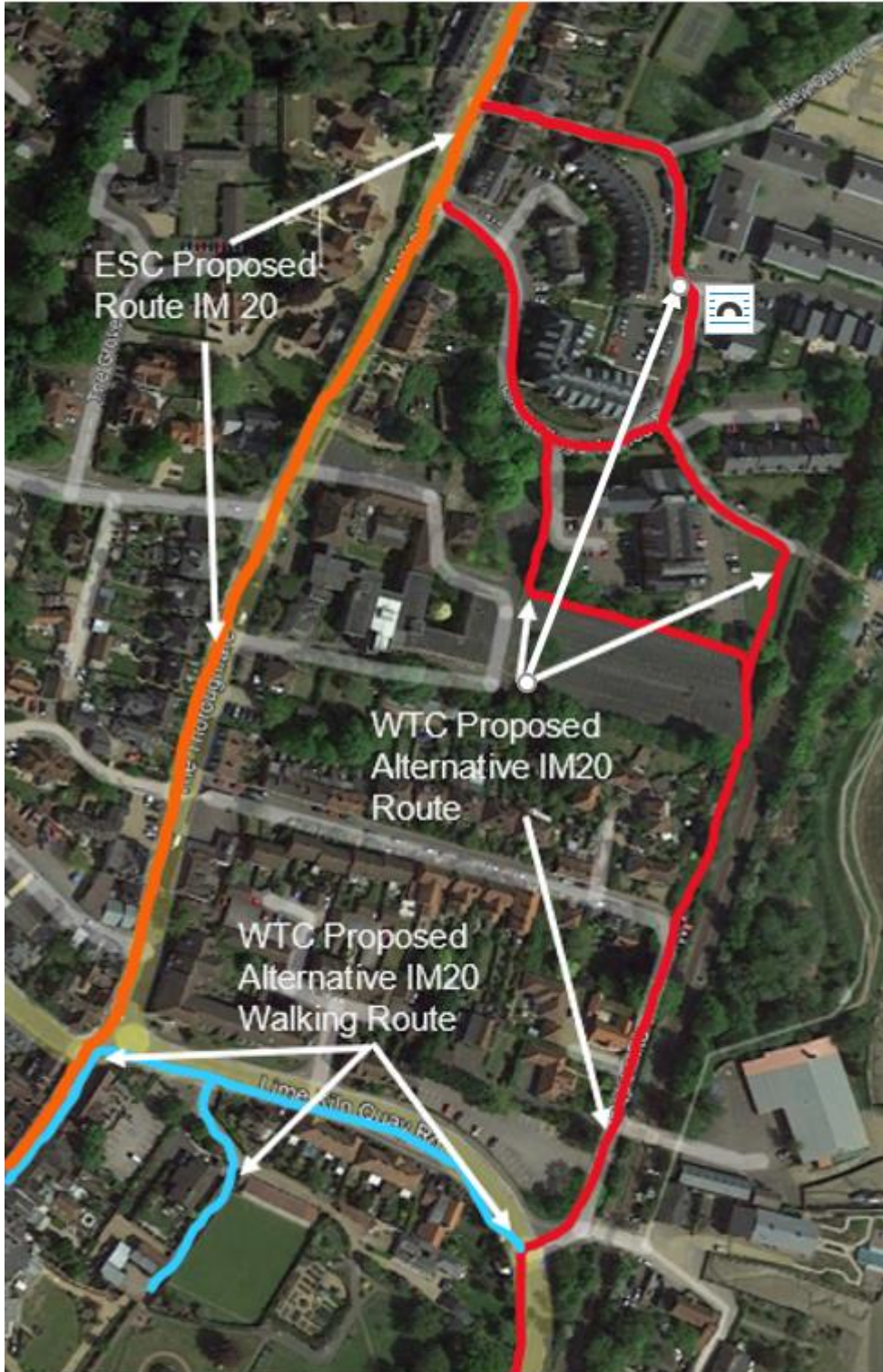
WTC would wish to clarify that the road between the traffic lights and Pytches Road is the northern part of the Thoroughfare and thus the draft strategy recommendation incorrectly refers to the traffic lights being "*north of the Thoroughfare*".

WTC, whilst highly supportive of more cycling, do not wish to see the Thoroughfare between the traffic lights and Cross Corner as a busy cycle route due to the considerable foot fall and cross pedestrian use. WTC see this area as a destination with cycle parking adjacent to it. To that end WTC is about to add cycle racks at Selwyn Gardens, adjacent to the traffic lights. WTC welcomes the Strategy's intention for further cycle storage, but this should be adjacent to, but not along, this part of the Thoroughfare.

WTC's view is that the proposed route is also compromised by

- The narrow highway between Old Maltings Approach and Pytches Road which is unattractive to cyclists given the considerable vehicular traffic and, in particular, lorry traffic.
- The traffic lights and the adjacent highway to the north is not a safe environment for cyclists. The proposed advance stop lines would place cyclists in an exposed position regarding traffic turning into the Thoroughfare towards Melton from Lime Kiln Quay Road and would encourage cyclists to weave through traffic or divert onto the eastern footway in this narrow section to get to the advance stop lines.

WTC recommend that at Old Maltings Approach or preferably New Quay Terrace and New Quay Lane, the route should divert off Melton Road to cross onto ESC's land to reach Deben Road and then onto Lime Kiln Quay Road with a dedicated crossing at that junction. A segregated cycle track could be formed along the current footpath of Quayside to the Hamblin Road lights with foot traffic directed up to Selwyn Gardens to either go via Elmhurst Park to Hamblin Road or the Thoroughfare south of the traffic lights. Current foot traffic on the Quayside footway is minimal. Cycle traffic to/from Woodbridge Station from/to Hamblin Road could use the current pedestrian crossings and then the B1438. WTC's is seeking, with SCC, to make this stretch of the B1438 a 20mph zone.



Route IM 21 – Farlingaye High School

Woodbridge Town Council ('WTC') support this route and consider that, from a local perspective, this route is of very high priority. WTC would wish to see its implementation as soon as possible to address the safety issues with school children along the Hasketon and Grundisburgh Roads part of the route.

WTC in its comments on IM 17 consider this route would be a preferable link between the B1069 and Hasketon Road for that stretch of the IM 17 Outer Woodbridge route due to safety concerns.

WTC suggest that to ameliorate traffic queuing at peak school times and issues with traffic filtering in from Bilney Road, Grundisburgh Road be made one way eastbound and Hasketon Road one way westbound. The latter could be aided by linking the pedestrian crossing lights on the A12 just to the north of Hasketon Road, to new traffic monitors on Hasketon Road, to allow traffic to filter out safely onto the A12 southbound.

Item 6

To note intentions to undertake works to trees in the conservation area

Neither the District Council nor the Town Council can object to these works unless the tree(s) is/are covered by a Tree Preservation Order.

Item 7

To comment on applications to trees with a Tree Preservation Order (TPO)

Item 8

To comment on applications for planning permission

DC/21/5703/FUL - 21 Crown Place Woodbridge Suffolk IP12 1BU	Expiry Date: Mon 31 Jan 2022
	Determination Deadline: Tue 15 Feb 2022
Single storey extension to side/rear and attic conversion	
DC/21/5700/FUL - Honeypot Cottage 41 New Street Woodbridge Suffolk IP12 1DZ	Expiry Date: Thu 03 Feb 2022
	Determination Deadline: Mon 14 Feb 2022
Rear extension and new sliding folding door	
DC/21/5701/LBC - Honeypot Cottage 41 New Street Woodbridge Suffolk IP12 1DZ	Expiry Date: Thu 03 Feb 2022
	Determination Deadline: Mon 14 Feb 2022
Listed Building Consent - Rear extension and new sliding folding door	
DC/21/5698/FUL - 60 Old Barrack Road Woodbridge Suffolk IP12 4ER	Expiry Date: Mon 31 Jan 2022
	Determination Deadline: Mon 14 Feb 2022
Kitchen Outbuilding for Local Catering Business	
DC/21/5677/LBC - 7 Queens Head Lane Woodbridge Suffolk IP12 4ND	Expiry Date: Thu 03 Feb 2022
	Determination Deadline: Mon 14 Feb 2022
Listed Building Consent: Replacement of two pairs of modern external french doors	
DC/21/5748/FUL - Shop At 10-12 Market Hill Woodbridge Suffolk IP12 4LU	Expiry Date: Thu 03 Feb 2022
	Determination Deadline: Thu 17 Feb 2022
Erection of 1 no. dwelling	

Item 9

To further comment on application DC/21/5180/FUL – Land between 15 and 17 Beech Way

Members will recall the discussion at the January 4th meeting of this Committee regarding DC/21/5180/FUL – Land between 15 and 17 Beech Way. The holding refusal has been lodged with East Suffolk Council, and an extension until Monday 24th January has been agreed by the case officer.

The Landscape Partnership (<https://thelandscapepartnership.com/about/>) were contacted by the Town Clerk and Chair and have produced the attached report for your consideration. **Members are asked if they wish to submit this document to East Suffolk Council to support our original refusal.**

The report highlights a number of incidents where the applicant has failed to supply the detail necessary to determine the application, and therefore the opinion of the author is that East Suffolk Council should not have proceeded to the consultation stage with the application until such information has been received. **Members are asked if they wish the Town Clerk and Chair to write a letter to East Suffolk Council raising our concerns about this failure of the planning process.**

Cllr Robin Sanders
Woodbridge Town Council,
Shire Hall,
Market Hill,
Woodbridge IP12 4LP

Our ref.: E22803

Your ref.: DC/21/5180/FUL

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Sent by email: councillorsanders@woodbridge-suffolk.gov.uk

11th January 2021

Dear Robin

**DC/21/5180/FUL –
Land Between 15 And 17 Beech Way Woodbridge Suffolk IP12 4BW**

Further to recent correspondence, I have now had opportunity to review the documentation associated with the above planning application and have considered the information presented as it related to biodiversity policy, both nationally and at the local level. I hold an Honours degree from the University of Sussex, and a doctorate from the University of East Anglia. I have been in practice with The Landscape Partnership since May 2002 and have over 30 years' professional experience as an ecologist, over 25 of which have been spent in consultancy. I am a Chartered Ecologist, a Chartered Environmentalist and a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Institute of Environmental Management and Assessment (IEMA).

The proposed development site – setting and context

The area which is subject to planning is an approximately L-shaped parcel of land which fronts onto Beech Way to the northwest with open countryside to its southeast, beyond which is the Woodbridge-Ipswich railway line, marshland (a S41 habitat) and the River Deben Estuary. The Deben Estuary is designated as both a Site of Special Scientific Interest and a Special Protection Area and at its closest point is approximately 250m from the red line boundary and 375m from the edge of the proposed development. Grove Court Care Home lies to the southwest and to the northeast is housing. The area to the northwest is undeveloped and the site thus forms part of a green corridor leading northwest from the estuary and thence to open greenspace in the heart of Woodbridge.

Review of Preliminary Ecological Appraisal (PEA)

A Preliminary Ecological Appraisal (PEA) prepared by Anglian Ecology and authored by Sue Morgan MCIEEM, a Chartered Ecologist and Chartered Environmentalist was submitted as part of the application. The report has been prepared to a high standard, but as the title suggests, this is a preliminary study to determine, *inter alia*, any requirements for further studies or surveys. It therefore should not have been submitted in isolation in support of a planning application. The PEA states that although no direct evidence of protected species was found from the site walkover, the whole of the surveyed area is *"currently a rich habitat for invertebrates, breeding birds, small mammals, and bat species. With water filled ditches running centrally across from east to west and along the south boundary, a former pond to the south boundary, (now lost to succession but still retaining areas of damp habitat), and marshy wet mire habitat to the north ... the site is also a good potential habitat for some amphibian species"*.

Directors:

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BA DipLA CMLJ
Dr Jo Parmenter
PhD BSc (Hons) CEcol CEnv MCIEEM MIEMA
Dianne Western
BA DipLA CMLJ
Phill Wray
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Technical Directors:

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William Wheeler
MA (Hons) MPhilD CMLJ

Associate Directors:

Michael Roseveare
NDArb MArborA

The Landscape Partnership Ltd is a practice of Chartered Landscape Architects, Chartered Ecologists and Chartered Environmentalists, registered with the Landscape Institute and a member of the Institute of Environmental Management & Assessment and the Arboricultural Association.

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Registered in England No. 2709001

The PEA consequently, and in my view correctly, recommends a number of further 'Stage II' surveys and studies be carried out, as the following extract from the PEA demonstrates:

Bats: *The site should be subject to commuting and foraging surveys for bats in order to see if this species is utilising the site area and provide appropriate mitigation and enhancement. These surveys should follow Good Practice Guidelines, and the recommendations of these surveys must be adhered to. Many trees on site have bat roosting potential. A Potential Bat roost assessment must be undertaken on any trees scheduled for pruning or removal to inform the need for further surveys and /or mitigation.*

Water vole: *There are several records of water vole within a 2km radius, further surveys for the presence/absence of this species are required*

Reptiles: *The site contains excellent reptile habitat particularly for slow -worm and grass snake. Further surveys for these species must be undertaken prior to works in order to inform the need for potential mitigation/ compensation and enhancement*

Birds: *Breeding bird surveys are required on this site. There are records of ground nesting birds within the search radius and these species, together with others may well be present on site. These surveys should follow current guidelines.*

Invertebrates: *Invertebrate survey (special reference stag beetle) to ascertain species and populations present and design appropriate mitigation.*

The report also sets out a likely requirement for potential mitigation/compensation for the above species groups based upon survey findings and correctly observes that enhancement opportunities cannot be developed until the results of survey are known.

The PEA includes a preliminary assessment of the impact of development of the site and concludes that impacts at the local or parish level are potentially high (i.e. there is a high risk of an adverse impact). I have highlighted in bold type what I consider to be the key issues:

<p>On site the areas of improved grassland are of low value, but the swathes of tall ruderals/scrub are significant habitat for invertebrates and as a consequence bird and bat species.</p>	<p>Potentially high – this habitat must be retained where possible and when likely to be lost must be compensated for in the landscaping and enhancement measures.</p>
<p>The trees on site will provide roosting habitat for bat species and nesting and foraging habitat for birds, as well as habitat for invertebrates.</p>	<p>Potentially high No trees should be removed without a check for the presence of breeding birds or a Potential Bat Roost Assessment (PBRA) for bat species. Where possible trees should be retained.</p>
<p>There are records of bat and bird species within the immediate area. The site provides excellent habitat for these species as does the land adjoining to the east. Development will potentially affect this habitat for both these species and more information should be obtained as to how they are utilising this site prior to works.</p>	<p>Potentially high – further surveys must be conducted on this site to assess its importance for breeding birds and bat species.</p>
<p>There are records of reptiles within a 2km radius and the site provides excellent habitats for most of these species</p>	<p>Potentially high – further surveys for reptiles should be conducted on this site prior to any works.</p>
<p>There are records of water vole within the search radius and potential habitat for this species exist to the site boundaries.</p>	<p>Potentially high – further surveys for water vole (the word 'reptile' was repeated in error in the report) should be conducted on this site prior to any works.</p>

A review of the documents submitted as part of the planning application indicates that the aforementioned surveys, which were recommended to be carried out by the scheme ecologist, a recommendation that I endorse, have either not been reported or have not been undertaken.

Planning Context – National Planning Policy Framework 2021

National planning policy as it relates to biodiversity is set out in section 15 of the NPPF: Conserving and enhancing the natural environment:

174. Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).

It would not be possible for the local planning authority to determine this application, as the recommended surveys, which would identify the site's biodiversity value and then inform its protection and underpin its enhancement, have not been undertaken.

In respect of conserving habitats and biodiversity, the NPPF states that

180. When determining planning applications, local planning authorities should apply the following principles: a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

There is no evidence the surveys recommended by the scheme ecologist have been performed, as no records are presented, and thus any necessary and appropriate mitigation or compensation has not been identified. It is consequently not possible for the LPA to determine the planning application

As the results of the surveys recommended by the scheme ecologist are not known, and thus any necessary mitigation or compensation has not been identified, it is consequently not possible for the LPA to determine the planning application

Planning Context –Suffolk Coastal Local Plan (Adopted September 2020)

Local plan policy in respect of biodiversity and geodiversity identifies (para 10.7) that:

all new developments to look at ways of increasing or improving areas of biodiversity and/or geodiversity importance, providing a net gain of biodiversity and/or geodiversity and enhancing the green infrastructure network. Areas of value, or potential value, for biodiversity include freshwater and marine environments as well as terrestrial habitats.

As alluded to above, in my professional opinion it is not possible for the local planning authority to determine whether or not the proposed development can provide a net gain as the results of the recommended surveys, if undertaken, have not been presented. Further, the site forms part of a green corridor leading northwest from the estuary, and this ecological corridor, which might, for example be part of a flyway for bats commuting from the open greenspace and woodland in the centre of Woodbridge to the estuary for foraging, would be severed by the proposed development.

Para 10.12 of the Local Plan states categorically that

Development proposals should be accompanied by sufficient information to assess the effects of development on priority habitats and species, protected sites, protected species, biodiversity or geology, together with any proposed prevention, mitigation or compensation measures.

This is not the case for this planning application, as evidenced by the report of the scheme ecologist, which sets out a need for a range of protected species surveys.

Under para 10.15 of the Local Plan, which focusses upon 'Conserving and Enhancing our Natural Areas', the importance of protection of habitats outside designated sites and of rare, scarce and protected species, is highlighted.

Where there is reason to suspect the presence of nature conservation interests, applications for development should be accompanied by a survey and assessment of their value, in accordance with local biodiversity validation requirements. If present, the proposal must be sensitive to, and make provision for, their needs.

The planning application is self-evidently in breach of this policy requirement and in my professional opinion should not have been validated by the planning authority as it does not meet the biodiversity validation requirements.

Paragraph 10.5 of the Local Plan states that

Consideration should be given to the European Birds or Habitats Directives as to whether 'screening' of impacts and/or an Appropriate Assessment is required... Development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons.

Due to the proximity to the estuary, I consider that Habitats Regulations Assessment screening should have been carried out for this development to determine whether the proposals would result in any impact upon the European protected habitat, for example through increased lighting close to the estuary, severance of flyways, or increased disturbance of loafing habitat/a high tide roost thus impacting upon the features for which the SPA was designated. The PEA notes that *"It is possible that species (such as bats and birds), with European and UK protection are present within the site area, but they are unlikely to be in a sufficient assemblage, or rarity value to be of international importance."* In my view it is not possible to determine this without considering through a formal Habitats Regulations screening exercise whether the site might be used as a high tide roost.

East Suffolk Validation Requirements (October 2020)

Biodiversity is considered on pg16 of the document. When required to validate an application:

Ecological Assessment (also referred to as a Habitat Assessment) will be required for any application which is within or may have an effect on:

o Special Protection Areas (SPA) including potential SPAs (pSPA)

o Special Areas of Conservation (SAC) including candidate SACs (cSAC)

o Ramsar sites or Sites of Special Scientific Interest (SSSI) (designated for their biodiversity value)

o National and Local Nature Reserves

o Roadside Nature Reserves

o County Wildlife Sites

Ecological assessment will also be required for any application which may result in an adverse impact on a protected species, UK Priority species or UK Priority habitat (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)).

The Validation Requirements further state that *"Although not a specific Local Validation Requirement, it is recommended that applications for all new dwellings within 13km of SPAs, SACs or Ramsar sites, particularly those for 'Planning in Principle' are accompanied by details necessary to enable the Council to undertake a Habitat Regulations Assessment (HRA)."*

Due to the proximity to the estuary, I consider that Habitats Regulations Assessment screening should have been carried out for this development to determine whether the proposals would result in any impact upon the European protected habitat, for example through increased lighting close to the estuary, severance of flyways, or increased disturbance of loafing habitat/a high tide roost, thus impacting upon the features for which the SPA was designated.

Although a PEA has been carried out and identifies the need for a wide range of protected species surveys at this site, those studies appear not to have been undertaken, and the PEA, although of a high standard, is not a formal ecological impact assessment EcIA as defined by CIEEM. Most professional ecologists would prepare a formal EcIA when the results of protected species surveys are known. The application does not therefore meet local validation requirements.

Conclusion

- In respect of the NPPF it is not possible for the local planning authority to determine this application, as the recommended surveys, which identify biodiversity value and which should underpin mitigation and enhancement of the site have not been undertaken.
- In respect of the East Suffolk Local Validation Requirements, I consider that the application does not meet the necessary standard for validation or to allow proper consideration of the likely effects of the development, and in particular fails to provide an adequate EcIA (which should be based on protected species surveys), nor does it provide suitable Habitats Regulations Assessment screening.
- In respect of Local Plan Policy SCLP10.1: Biodiversity and Geodiversity, I consider that the application should not be approved by the LPA as it:
 - Fails to maintain, restore or enhance the existing green infrastructure network, and in fact is likely to cause detriment to an ecological corridor
 - Fails to follow the hierarchy of seeking firstly to avoid impacts, then mitigate for impacts so as to make them insignificant for biodiversity, or as a last resort compensate for losses that cannot be avoided or mitigated for, because the information which should underpin this approach, namely a report of the completed protected species surveys, is not available.
 - Fails to demonstrate ecological enhancements as part of its design and implementation.
 - Fails to provide evidence as to the presence or absence of protected UK or Suffolk Priority species or habitat, because the application is not supported by ecological survey targeted at such species.
 - Fails to include a full Ecological Impact Assessment (EcIA)
 - Fails to carry out an adequate Habitats Regulations Assessment screening.
 - Fails to meet local validation requirements.

I would recommend that Woodbridge Town Council formally objects to the scheme due to the considerable shortcomings in the application, and significant potential for adverse impact upon biodiversity.

Yours sincerely,



Dr Jo Parmenter MCIEEM CECOL CEnv
Director

Enc.

c.c. Greg Diaper (Town Clerk) townclerk@woodbridge-suffolk.gov.uk
Woodbridge Town Council

ITEM 10

To note East Suffolk Council decisions on Planning Applications where those decision are contrary to this Council’s recommendations and not previously reported

This schedule only lists those applications not previously reported to Committee.

Date	Application	WTC Decision	ESC Decision	ESC Officer (Delegated) or Committee Decision
emailed	DC/21/1849/VOC - The Saleroom Theatre Street	Approval	Awaiting decision	
10.08.21	DC/21/3541/FUL - Grove Lodge 6 Pytches Road	Deferred	Awaiting decision	
07.09.21	DC/21/3748/PN3 - Framfield Medical Centre,	Approval	Awaiting decision	
21.09.21	DC/21/4002/ARM - Land To The South And East Of Adastral Park	Deferred	Awaiting decision	
21.09.21	DC/21/4003/ARM - Land To The South And East Of Adastral Park	Deferred	Awaiting decision	
21.09.21	DC/21/4004/ARM - Land To The South And East Of Adastral Park	Deferred	Awaiting decision	
21.09.21	DC/21/4005/ARM - Land To The South And East Of Adastral Park	Deferred	Awaiting decision	
21.09.21	DC/21/4150/FUL - 3A Thoroughfare	Deferred	Application Withdrawn	
05.10.21	DC/21/4365/FUL - 24 Anni Healey Close Woodbridge Suffolk IP12 1GZ	Approval	Awaiting decision	
05.10.21	DC/21/4002/ARM - Land To The South And East Of Adastral Park	Refusal	Awaiting decision	
05.10.21	DC/21/4003/ARM - Land To The South And East Of Adastral Park	Refusal	Awaiting decision	
05.10.21	DC/21/4004/ARM - Land To The South And East Of Adastral Park	Refusal	Awaiting decision	
05.10.21	DC/21/4005/ARM - Land To The South And East Of Adastral Park	Refusal	Awaiting decision	
19.10.21	DC/21/4358/FUL - 96 Edwin Avenue	Approval	Awaiting decision	
19.10.21	DC/21/4557/FUL - Little Kyson Broomheath	Refusal	Awaiting decision	
30.11.21	DC/21/5159/TPO - 37 Mill View Close	Refusal	Application Refused	Nick Newton
30.11.21	DC/21/5095/FUL - 24 Cherry Tree Road	Approval	Awaiting decision	
30.11.21	DC/21/5063/FUL - 3 Pinewood	Approval	Application Permitted	Nick Clow
30.11.21	DC/21/5187/FUL - 6B Prentices Lane	Refusal	Awaiting decision	

30.11.21 DC/21/4557/FUL - Little Kyson Broomheath
 14.12.21 DC/21/5196/FUL - 2 New Street Woodbridge IP12 1DT
 14.12.21 DC/21/5268/FUL - 17 Barton Road Woodbridge Suffolk IP12 1JQ
 DC/21/5406/FUL - 5 Central Maltings Crown Place Woodbridge IP12
 14.12.21 1BS
 14.12.21 DC/21/5251/LBC - 32 Seckford Street Woodbridge IP12 4LY
 14.12.21 DC/21/5259/FUL - 61 New Street Woodbridge IP12 1DZ
 14.12.21 DC/21/5260/LBC - 61 New Street Woodbridge IP12 1DZ
 14.12.21 DC/21/5250/FUL - 32 Seckford Street Woodbridge IP12 4LY
 14.12.21 DC/21/5399/FUL - 1 Cherry Tree Road Woodbridge Suffolk IP12 4BL
 14.12.21 DC/21/5412/FUL - 23 Through Duncans Woodbridge Suffolk IP12 4EA
 04.01.22 DC/21/5531/FUL - 8 Kingston Farm Road
 04.01.22 DC/21/5462/FUL - 26 Cherry Tree Road
 04.01.22 DC/21/5180/FUL - Land Between 15 And 17 Beech Way

Refusal	Awaiting decision	
Approval	Awaiting decision	
Approval	Application Permitted	Jamie Behling
Approval	Awaiting decision	
Approval	Awaiting decision	
Approval	Awaiting decision	
Approval	Awaiting decision	
Approval	Awaiting decision	
Approval	Awaiting decision	
Approval	Awaiting decision	
Approval	Awaiting decision	
Approval	Awaiting decision	
Refusal	Awaiting decision	