



## **NORTHERN FRINGE PROTECTION GROUP**

### **Safeguarding the Character of Ipswich**

#### **Comments on Planning Application IP14/00638/OUTFL**

#### **Proposed Development at: Land To South Of Railway Line**

#### **Westerfield Road Ipswich Suffolk**

Case Officer: Ms Rosalynn Claxton

We object to the above planning application and recommend that it be rejected due to its poor quality and repeated non-compliance with the Core Strategy and the draft Ipswich Garden Suburb Masterplan. It also fails to meet key aspects of the National Planning Policy Framework, most notably:

- It does not identify and coordinate development requirements including the provision of the necessary infrastructure;
- It fails to create a high quality build environment and does not adequately support health and social well-being;
- It does not improve biodiversity or use resources prudently, will not minimise pollution or sufficiently mitigate and adapt to climate change nor move to a low carbon economy.

Our submission shows that the application:

- does not sufficiently address key site-wide issues including strategic infrastructure
- does not sufficiently promote sustainable transport;
- will not deliver high quality homes ;
- is not of good design;
- will not adequately promote healthy communities;
- fails to demonstrate that it will meet the challenge of flooding or climate change
- will not sufficiently conserve and enhance the natural environment.

The application consistently fails to comply with Ipswich Borough Council's Local Plan in relation to policies CS1, CS2, CS5, CS15, CS16, CS17, CS19, DM1, DM2, DM3, DM4, DM5, DM10, DM15, DM17, DM18, DM24, DM29 and DM 32. It is also non-compliant with the draft Ipswich Garden Suburb Masterplan in relation to these areas.

Statutory consultees that have so far raised major objections and/or concerns include Anglian Water, Environment Agency, NHS England, Sport England, Suffolk Constabulary, Suffolk County Council, and Suffolk Wildlife Trust. These objections reiterate our concerns and demonstrate that the application is non-compliant with the NPPF.

The planning application must be dismissed accordingly.

Our main objections are listed below supported by more detailed comments on the planning application documents in an appendix.

#### **1. Prematurity**

'A prerequisite for any development being granted planning permission in the Northern Fringe will be the prior adoption by the Council of a supplementary planning document'<sup>1</sup>, known as the Ipswich Garden Suburb Supplementary Planning Document or Masterplan. This has not happened and is unlikely to happen until September 2015 at the earliest since it is dependent upon the adoption of a revised Core Strategy. The latter will have to be submitted for public examination by a Government appointed Inspector and the timescales and outcome are by no means certain. Furthermore, the public has only recently been consulted on the draft Masterplan and the feedback has yet to be incorporated into a revised document for presentation to the full Council and to be made available to the public. We appreciate the Council's concerns that a refusal of planning permission based solely on the fact that it is too early since the Ipswich Garden Suburb SPD has yet to be adopted by IBC is likely to face an appeal. Such an appeal is likely to be based on the National Planning Policy Framework and the inability of the Council to demonstrate that it can achieve its 5 year housing target +5%. Nevertheless, we question on what legal basis the Council can pre-empt the likely outcome of the appeals process. However, as we demonstrate in Section 2 below and elsewhere in this document and appendix, the application is premature in other key respects. It appears to have been rushed through with many major inconsistencies and omissions. In our view the Ipswich Garden Suburb is too important to rush through and get wrong. We would like to see the Council follow due process to ensure the Ipswich Garden Suburb is planned and delivered in an integrated holistic way to ensure a quality development with the required infrastructure, whilst minimising the negative impacts on the rest of the community.

## **2. The Application is Incomplete, Inconsistent and Confusing**

Whilst appreciating the large volume of documentation in the planning application and the difficulty in achieving an error free submission, there appear to be many confusing inconsistencies and omissions that give the impression that the application was submitted in haste and as such is premature. It needs further work and should be rejected. Examples are given below:

### **2.1. Phasing**

The proposed phasing of the Mersea/CBRE development differs across the documents, which make it impossible for consultees to understand the proposal. As examples, the Planning Statement states that there are two broad phases, unlike the Design and Access Statement, which states on page 80 there will be Phases 1-4 (including Phase 1a and 1b totalling 185 dwellings), although the accompanying diagram on the same page shows three phases with subsets (totalling six). The Transport Assessment appears to be based on two Phases - Phase 1 providing 150 dwellings and Phase 2 providing 750 dwellings. The Foul Water Assessment is based on Phases 1A-1E (where Phases 1A and 1B total 260 residential units).

The Transport Assessment incorrectly assumes that the only Ipswich Garden Suburb development prior to 2021 will be the Mersea Homes/CBRE site, which is clearly not the case.

### **2.2 Incomplete**

- The application lacks key information, in particular the infrastructure tables have far too many gaps. One key concern is the lack of detail on a foul water solution for the detailed application, the outline application and for the entire Garden Suburb. The lack of this information, coupled with the lack of any agreement by Anglian Water indicates the prematurity of the application, as does the incomplete Flood Risk Assessment (FRA) rejected by The Environment Agency. See below for further comment.

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<sup>1</sup> Ipswich borough Council's Adopted Core Strategy section 8.104 policy CS10

- The application fails to take account of the proposals by Network Rail to re-locate Westerfield station, which may impact upon this application. We also note that Mersea Homes/CBRE has ignored Network Rail’s previous concerns resulting in a formal objection from Network Rail.
- Appendix E Proposed improvements to junctions differ from the plans contained in the Transport Assessment Plans e.g. the Henley Rd/Valley Rd junction. The application needs to show the changes to Valley Rd past the Dale Hall Lane junction in the direction of Norwich Rd re: two lanes. See additional inconsistencies in ‘Highway Changes’ in 3.2 below
- The Environmental Statement fails to take account of the impacts of the proposed road changes during the construction phase.
- With regard to sustainable travel, the Design and Access Statement is inconsistent with the proposed Phase 2 gyratory system, which does not include pavements and dedicated cycle ways and the apparent proposal to remove dedicated cycle lanes on Valley Rd.
- There is not a full breakdown of the proposed Open Spaces, including the quantity of outdoor sports space, which are needed to demonstrate compliance with the Core Strategy standards. We note that Sports England has raised objections.
- More detail is required on the health centre provision rather than just a mention of the possibility of one. The draft Masterplan agreed by the IBC Executive concludes, “that a serviced site with contributions is now seen as the optimal solution for the delivery of a health centre, rather than a reserved site. A 0.2ha-sized site is an approximation of the area required at this stage for a six doctor medical facility. We note that NHS England has raised objections on the provision of health services.
- There is no proposed agreement on how to secure the provision of a high school site.

### 3. Traffic Assessment

The impact of the proposed development of the Ipswich Garden Suburb on our already heavily congested roads is a major concern for residents and road users. A requirement of the planning application is the submission of a Traffic Assessment and a Travel Plan not just for the Mersea Homes/CBRE site south of the railway line but also for the entire Ipswich Garden Suburb. We believe the Traffic Assessment to be fundamentally flawed and to seriously underestimate the impact of traffic. Even so, the estimates provided for the whole site show severe traffic delays on several routes, which in our opinion make the development unsustainable. We also expect severe road congestion to occur during the Mersea Homes/CBRE construction phase associated with the highway changes and the Valley Road 330m sewer upgrade and installation of a very large 550 m<sup>3</sup> foul water-holding tank. No assessment has been made of this partial closure of Valley Rd, which is likely to last many months.

- The modelling analyses the traffic impacts on 4 key routes, namely Tuddenham Rd into the town centre, Henley Rd down to the waterfront, Woodbridge Road through to Norwich Rd and the A1214 bypass from the hospital through to the Ipswich railway station. A key omission is a route encompassing Westerfield Rd since most of the traffic from the Garden Suburb will leave/enter the Garden Suburb from this road.
- The traffic models have been calibrated using traffic count measurements made during the last 2 weeks of July 2013 <sup>2</sup>and September 2013. The July measurements commenced after Ipswich School had broken up for the summer holidays and included a period when all schools had broken up. This has a major effect on traffic, July is clearly not a ‘neutral

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<sup>2</sup> Note: we can supply email correspondence with SCC showing the July 2013 traffic count took place in the last two weeks following the commencement of the Ipswich School summer break.

month' and we would argue this is a major flaw in the calibration. Coach traffic to/from Ipswich School negatively impacts on traffic flows in neighbouring roads. Although September includes school traffic it is not representative of the higher winter traffic, when fewer people walk or cycle due to the bad weather and dark nights. This is particularly relevant to the Garden Suburb as Christchurch Park is closed over-night and the bridleway is considered by many to be too unsafe to use as an alternative.

- The application contains inconsistent statements regarding the inclusion of additional development in Ipswich. Paragraph 9.3.1 of the Transport Assessment states that "The 2021 and 2027 base assessments include only those developments and/or transport infrastructure elements that are fully committed, have planning consent and in the case of infrastructure proposals are funded and have genuine delivery timetables." Clearly this will underestimate traffic flows given the Core Strategy housing and jobs growth plans.
- The 2021 and 2027 base assessments need to include construction and tradesman traffic for the entire Ipswich Garden Suburb site. This is likely to be considerable given the multi-phase approach across the Garden Suburb. As the Mersea Homes/CBRE site is expected to be built out across a 10-15 year timescale this is extremely relevant to the scenarios. Construction traffic appears to have been completely excluded, thereby underestimating traffic flows.
- SCC as the highways authority has recommended a sensitivity analysis based on the use of AECOM's trip rates and we support this. However, the applicant's Transport Consultants, Croft Transport Solutions, have only applied this for the Phase 1 development of 150 homes as detailed in Appendix 11. Croft have used a much reduced sensitivity analysis for the first 900 homes<sup>3</sup> compared with AECOM, approximately 29% fewer total trips for the morning rush hour and 19% fewer total trips for the evening rush hour. For the whole Garden Suburb Croft have assumed trip rates used in the 2008 traffic models which when compared with the AECOM sensitivity trip rates are approximately 40% lower for the morning rush hour and 43% lower for the evening rush hour. We also note that Croft's recreation of AECOM's trip rates regarding education and retail are higher than those used by Croft in its modelling. In particular, the secondary school will be taking pupils from outside of the Garden Suburb and this additional traffic must be included. We also note that most school staff are unlikely to live in the school catchment area and are unlikely to use public transport due to the books, laptops etc they need to carry.
- We note that the modelling assumes that the Garden Suburb Travel Plan<sup>4</sup> is fully and successfully implemented with "extraordinary" levels of sustainable travel never seen before in Ipswich. However we note from the 2011 Census results<sup>5</sup> compared with the 2001 results that the percentage cycling to work in Ipswich is falling not rising. In 2001 it was 5.7% falling to 4.6% in 2011 i.e. a drop of almost 20%. Sensitivity modelling is required to show the impact on traffic with lower rates of sustainable travel.
- We believe that the modelling must use trip rates acceptable to AECOM and SCC and not those advocated by Croft on behalf of the developers.
- The Tables shown in Appendix 12 are dated March 11, 2010. This would therefore appear to ignore all trips from any developments after this date e.g. Hayhills, Colchester Rd Fire Station, Waterfront etc. Traffic movements from all additional and planned developments must be incorporated into the analysis.

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<sup>3</sup> See Transport Assessment Table 9.5

<sup>4</sup> We note that this Plan does not actually exist.

<sup>5</sup> <http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-353510>

- The models are based on the 2008 versions when it was assumed that there would be major jobs growth within the town centre and that it would be possible to encourage a modal shift to more sustainable forms of transport to the town centre. However, the town centre has not been identified by the 2013 Suffolk Growth Strategy or the New Anglia Local Enterprise Partnership 2014 Strategic Economic Plan as a major employment growth site. The only principle employment growth site identified within the Ipswich boundary is the Futura Park/Ransomes Europark expansion, which are located at the opposite end of town from the Garden Suburb. The next two nearest sites are the Former Sugar Beet Factory and Adastral Park. None of these three sites are within easy reach of the Garden Suburb by public/sustainable transport.
- Since sufficient jobs growth is unfortunately not forecast in the Town centre then commuting by car would seem inevitable. The model needs to take account of the location of the major employment growth sites around Ipswich and the increased traffic flows from the Garden Suburb to them. To ignore the location of new employment sites and assume that the majority of new jobs will be created in the town centre is simply not credible.
- We also note that in 2001 the net commute into Ipswich was 11,767, which has fallen dramatically to 6,171 in the 2011 census<sup>6</sup> due to more people commuting out of Ipswich to work. This trend needs to be incorporated into the modelling work.
- Despite, in our view, the optimistic assumptions built into the traffic modelling, the forecast impact on the Ipswich road network is severe. Table 11.2 of the Traffic Assessment relates to the 2027 PM rush hour with the full Garden Suburb developed and mitigating highway improvements in place. It lists 16 road links with increases in journey time of 4 minutes or above per km. The delay between the Norwich Rd roundabout and Henley Rd traffic lights (link 154) without/with the Garden Suburb development is expected to rise from 5.27 min/km to 14.1min/km giving a delay of 15.5 min for the 1.1km link with the Garden Suburb. The town centre is also significantly affected and as an example, from the top of Argyle Street to St Helens St/St Margaret's Plain (link 173) the forecast delay rises from 11.75 min/km without the Garden Suburb to 34 min/km i.e. a delay of 17 minutes for the link with the Garden Suburb. Anglesea Rd to the bottom of Berners St (link 104) rises from 8.6min/km to 24 min/km i.e. a delay of 12 minutes for the link. The time taken to travel just 100m on some of the links also looks particularly disturbing e.g. 7.37 minutes on route 125; 5.36 minutes on route 131; 5.22 minutes on route 132; 4.46 minutes on route 173 and 3.1 minutes on route 104. This shows that traffic is virtually stationary. The road network will clearly be unable to handle any form of breakdown, accident, roadworks or emergency. Emergency vehicles will clearly struggle to pass through this level of congestion and will put human lives at unacceptable risk. The only possible conclusion is that Ipswich will be subject to gridlock on an almost daily basis, detrimentally impacting on business and resulting in unacceptable air pollution. Bearing in mind these figures assume trip rates 43% lower than the AECOM sensitivity models and do not take account of some of the forecast population and jobs in the Ipswich Core Strategy, or any construction traffic etc, the situation will be far worse. This is clearly not sustainable.
- The gyratory highway changes proposed for Westerfield Rd have not been incorporated into the Transport Assessment scenarios notably 3B and need to be included.
- The Transport Assessment is also incomplete as it fails to consider the impacts of traffic flows on the road network of the surrounding villages, most notably Westerfield, Tuddenham and Henley which already experience traffic flows from Ipswich.

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<sup>6</sup>[www.neighbourhood.statistics.gov.uk/HTMLDocs/dvc193/index.html#sty=true&flow=flow2&period=0&fix=E07000202&view=475.625,237.8125,78.75,79.375&tr=-136.894775390625,-184.43862915039062&sc=1](http://www.neighbourhood.statistics.gov.uk/HTMLDocs/dvc193/index.html#sty=true&flow=flow2&period=0&fix=E07000202&view=475.625,237.8125,78.75,79.375&tr=-136.894775390625,-184.43862915039062&sc=1)

- The application fails to provide a comprehensive sustainable access and movement strategy or the outline travel plans as requested by AECOM, on behalf of Suffolk County Council, in its response to the Scoping Note.

#### 4. Highway Changes

- The proposed highway improvements for both the Henley Rd/Dale Hall Lane traffic lights and the Westerfield Rd roundabout are shown differently in the Infrastructure plans (Appendix E) and the Transport Assessment Plans. Similarly the northern Westerfield Rd gyratory system. Mersea Homes/CBRE needs to identify the correct plans and resubmit for further consultation.
- Both sets of plans show the removal of the cycle lanes around Henley Rd and Dale Hall Lane on Valley Rd. The proposed lane re-alignment and allocation changes at the Henley Rd/Valley Rd junction to improve pedestrian/cycle access due to take place October 2014 have been ignored. The proposals are inconsistent with these changes and will make cycling more difficult than it already is.
- The Westerfield Rd gyratory system<sup>7</sup> is not shown to have dedicated cycleways or paths, which is inconsistent with respect to sustainable travel mentioned in the Design and Access Statement.
- The additional lanes planned for Valley Road may raise safety concerns for residents turning into or exiting their driveways and also for pedestrians since, with the removal of some of the grass verges, parts of the pathways are reduced to 1.5m between the properties and carriageways. In places the road is currently much higher than the southern pathway with the verges providing a transition. With the widening of the carriageway it is not at all clear how the height difference can be safely accommodated for cyclists and also cars entering driveways. This needs more detailed investigation into the viability of the highway proposals and further public consultation.
- Regarding the proposed additional traffic lanes, the application needs to show the changes to Valley Rd past the Dale Hall Lane junction in the direction of Norwich Rd and similarly the changes to Westerfield Rd past Valley Rd in the direction of the town. Likewise any changes at the Norwich Rd roundabout required to manage the increased traffic flows.
- The location of the controlled crossing to allow access to/from the Fonnereau Way needs to be included in the Infrastructure Plans
- The Henley Rd junction by Henley Court should be widened to allow a separate line for traffic turning right to improve traffic flow. This is the most obvious improvement needed but has been omitted presumably since it will affect a small amount of privately owned land but this is not a sufficiently good enough reason.
- We are concerned that the proposed Phase 2 northern section (as illustrated on the northern section diagram) creates a blind spot for traffic, pedestrians and cyclists crossing into the Mersea Homes/CBRE site, especially given the proposed location of the secondary school. This would appear to be unsafe.
- We are concerned that secondary school traffic wanting to turn right onto Westerfield Rd will back up and block the Phase 2 northern gyratory junction. This needs to be modelled and presented as part of the consultation process.
- We are concerned that the only Phase 2 access to the Mersea Homes/CBRE site from Westerfield Rd is at the northern end towards the level crossing. Given Network Rail's plans to increase the frequency of freight services, which will be long trains of many containers, this is likely to result in traffic being backed up both along the gyratory

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<sup>7</sup> Transport Assessment Plans page 19

system and within the development. This needs to be modelled/assessed in detail and presented as part of the consultation process.

- The simple priority junction along Westerfield Road that is planned to serve up to 150 dwellings<sup>8</sup> needs to include a controlled crossing facility or underpass that allows schoolchildren to safely access the secondary school by foot and on cycle. It also needs to be on a formal cycle route otherwise the application is non-compliant with the Garden Suburb Masterplan.
- We also note that there are no firm design proposals to improve the cycling network between the Garden Suburb and the town centre, without which the sustainable travel objectives will not be achieved.

## 5. Foul Water Drainage

- This aspect has been a major concern for residents since Anglian Water first highlighted sewer pipeline capacity issues in February 2013. For such strategic infrastructure a solution for the entire Garden Suburb needs to be found that is satisfactory to Anglian Water, IBC, the developers and Ipswich residents. The current proposals are lacking in detail, have inconsistencies, are provisional hence subject to change and require confirmation by Anglian Water before planning permission can be granted. Furthermore, there has been no confirmation by Anglian Water that additional pipeline enhancements will not be required across the town to transport the sewage to Cliff Quay. Clearly if such changes are required they will need to be assessed in the Environmental Impact Statement and the construction impact on the transport network. Without such reassurances and further detail the application is premature and should be referred back for further work.
- As an example of inconsistencies, the Environmental Statement only mentions one pumping station whereas the Drainage Survey Final Report July 2014 states there are two on the Mersea Homes/CBRE site. The Foul Water Drainage Strategy includes two pumping stations and a 550m<sup>3</sup> storage tank on Valley Rd, which is not mentioned in the Environmental Statement.  
Regarding examples of the lack of detail the positioning of the Mersea Homes/CBRE pumping stations is not shown; nor the position and dimensions of the storage tank identified for Valley Rd; the pipeline enhancements under Valley Rd are not described; the impact on buried services such as gas and high voltage mains has not been described; the environmental impacts are not described including carbon emissions; the only detail provided for the Red House and Henley Gate sites is the potential connection points to off-site sewage pipes and no details provided of pumping stations, off-line storage etc. Full details of a Garden Suburb site-wide foul water drainage solution are required in order to assess the cumulative impacts of the development.
- We strongly agree with Anglian Water's proposed planning condition for the garden Suburb site that *"No development shall commence until a foul water strategy has been submitted to and approved in writing by the Local Planning Authority. No dwellings shall be occupied until the works have been carried out in accordance with the foul water strategy so approved unless otherwise approved in writing by the Local Planning Authority."*

## 6. Air Quality

The Air Quality assessment needs to take account of IBC's proposal to move to a single AQMA for the town centre. Traffic Assessment modelling shows long periods of almost stationary traffic in

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<sup>8</sup> Section 6.1.1 and 6.2 of the Transport Assessment

AQMA areas and the effects of this must be properly assessed. We are particularly concerned with the air quality impacts around St Margarets and St Helens primary schools as the modelling shows almost stationary traffic flows in the morning. IBC must not put the health of young children at risk as this application clearly will. Using “official” NOx emission reduction figures for Ipswich is not a valid approach as NOx pollution is already increasing in Ipswich and the severe increase in congestion will exacerbate this. The new traffic light system also appears to be increasing queuing traffic at certain points thereby increasing NOx pollution in these areas. Unless air quality is improved in the proposed town centre AQMA, numbers of cyclists and pedestrians are unlikely to increase due to health concerns.

## **7. Site Drainage**

Drainage is of concern to residents particularly those living in Westerfield and Lower Rd where flooding sometimes occurs. Recent minutes of the Development Steering Group show that the IBC Drainage Engineer has concerns with the proposed solution. The IBC Drainage Engineer and the Environment Agency must be fully satisfied that the proposed drainage solution /SUDS are acceptable. We strongly agree with the Environment Agency that the submitted Flood Risk Assessment (FRA) does not provide a suitable basis for assessment to be made of the flood risks arising from the proposed development in relation to the adequacy of the surface water receiving system and demonstrate that the post-development volume of surface water runoff will be controlled so that it does not exceed the existing Greenfield volume.

## **8. Bus Strategy**

The bus strategy shown in Appendix 6 appears nothing more than a wish list unsupported by any form of objective economic analysis e.g. by using estimated trip rates, assumptions on modal shift and analysis of employment growth sites.

## **9. Loss of Trees & Hedgerows**

The approach of grouping trees together, in several different categories, hides the real number of trees and hedgerows to be felled. The Arboricultural Assessment assumes that there will be no tree felling required for junction improvement etc around Valley Rd, which appears to be inconsistent with Mersea Homes/CBRE’s highway plans. We believe that too many trees and hedgerows are to be felled with too great a loss of biodiversity and habitat that is in breach of CS Policy DM10 and the Garden Suburb Masterplan. We note the Suffolk Wildlife Trust shares our concerns regarding the loss of hedgerows. The Arboricultural Assessment must include a total for the number of trees to be felled.

## **10. Parking and Garage Spaces**

Although the application states that the provision for car parking will be made in accordance with the standards and policy set out by Ipswich Borough Council and Suffolk County the appended diagrams show an under provision that is non compliant e.g. 3 not 2 spaces should be provided for homes of 4 or more bedrooms. In addition there is little provision for on street parking. We suggest a condition is placed on the development which prevents garages being subsequently converted into other accommodation. The garage length dimension of 6m is non compliant with the Suffolk County Council Car Parking Guidance 2014<sup>9</sup> that requires a length of 7m.

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<sup>9</sup><http://www.suffolk.gov.uk/assets/suffolk.gov.uk/Environment%20and%20Transport/Planning/Suffolk%20Advisory%20Parking%20Guidance%202014.pdf>

## **11. Low Carbon Buildings**

The adopted Core Strategy policies DM1 (Sustainable Development) and DM2 (Decentralised Renewable or Low Carbon Energy) set out the Council's current more specific requirements for new buildings in respect of environmental sustainability, including, amongst other things, energy and water use, and renewable energy. These standards are expressed in terms of the nationally described standards of Code for Sustainable Homes (CfSH) for new housing, and BREEAM for non-residential buildings. The DM1 requirement for the Garden Suburb is that homes meet CfSH5 from 2013 and CfSH6 from 2016 and non residential buildings BREEAM of Excellent. Mersea Homes/CBRE are proposing<sup>10</sup> CfSH 3, no local generation of power (the DM2 requirement is 15%) and a BREEAM of Good. These proposals are non-compliant and should be rejected.

We note there are many homes near to the Garden Suburb with one or more renewable technologies already installed. It would seem a missed opportunity not to include south facing roof mounted solar PV systems, which are now relatively low cost<sup>11</sup> meaning that the cost of compliance would be low. It would also help alleviate fuel poverty especially for the affordable accommodation.

## **12. House Design**

The detailed housing design for the first 80 houses is a great disappointment to many people being crammed, bland and uninspiring. The 4 bedroom homes are particularly bland and box-like. One would have thought this first phase would have set the benchmark for the rest of the development. The Garden Suburb Masterplan has high aspirations in terms of design, distinctive feel and quality, more in keeping with the attractive neighbourhood, but this is not what is being proposed. The developer should be encouraged to revisit the designs.

## **13. Open Spaces**

The application needs to contain a full breakdown of the proposed Open Spaces, including the quantity of outdoor sports space, in order to demonstrate compliance with the Core Strategy standards. In order to be useful, a planning condition must be imposed to ensure that all outdoor sports space is flat, level and well-draining. We note that Sport England has raised concerns over this.

## **14. Risk to Country Park**

The application fails to implement the recommendations of the Habitat Regulation Assessment screening report for the mitigation strategy to address the likely significant effect on the Stour and Orwell Estuaries Special Protection Areas and RAMSAR sites. In order to be effective, the Country Park must be part of an integrated Ipswich Garden Suburb Masterplan and clearly cannot be dependent on the timing of the Henley Gate development.

Rod Brooks & Brian Samuel

Submitted on behalf of the Northern Fringe Protection Group<sup>12</sup>

Issue 1 7<sup>th</sup> September 2014

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<sup>10</sup> Energy & Sustainability Strategy page 44

<sup>11</sup> Energy & Sustainability Strategy page 42

<sup>12</sup> The Northern Fringe Protection Group (NFPG) is making this representation on behalf of its 187 members and 135 other residents who have authorised the NFPG to represent them totalling 322 people. A list can be supplied on request.