



**LAND NORTH OF CONWAY CLOSE AND  
SWALLOW CLOSE, FELIXSTOWE**

**ENVIRONMENTAL STATEMENT VOLUME I:  
NON-TECHNICAL SUMMARY**

October 2022

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## Introduction

1. Generator Optima (Ferry Road II) Ltd. has submitted an application for outline planning permission to create up to 150 new homes, associated infrastructure and open space on the land to the north of Conway Close and Swallow Close, Felixstowe. It is currently being considered by East Suffolk Council under reference DC/21/2710/OUT.
2. An Environmental Impact Assessment (EIA) has been undertaken and its findings are reported in an Environmental Statement (ES), prepared by JCN Design & Planning and a team of specialist consultants. The ES is submitted in support of the application for outline planning permission.
3. An EIA is required for projects that are of a certain size and are likely to have an impact on the environment. An ES presents the methodology and findings of an EIA and provides the local planning authority with information on the likely environmental effects so that an informed decision can be made on the application for planning permission.
4. This document is a Non-Technical Summary of the findings reported in the ES. The ES and other documents that form the application for planning permission are available for public inspection at East Suffolk Council's offices at East Suffolk House, Station Road, Melton, IP12 1RT or Riverside, 4 Canning Road, Lowestoft, NR33 0EQ during their normal opening times. They can also be found in the planning section of the council's website ([publicaccess.eastsuffolk.gov.uk/online-applications](http://publicaccess.eastsuffolk.gov.uk/online-applications)) using reference DC/21/2710/OUT.
5. The ES and this Non-Technical Summary may also be purchased from JCN Design & Planning in two formats, following receipt of the following costs:
  - Hard copy of the Environmental Statement and appendices: £150
  - Hard copy of the Non-Technical Summary: £25
  - PDF copy of the Environmental Statement and Non-Technical Summary on a USB stick: £10

## Site Description and Context

6. Felixstowe is the second largest settlement in East Suffolk district. It sits at the end of a peninsula bounded by the River Orwell, the River Deben and the North Sea. As well as the town, the peninsula also contains areas designated because of their international and national importance for landscape, environment and nature conservation. The town is a hub for services and facilities, serving a wider hinterland as well as the residents of the town itself, including community and education provision alongside a range of shopping opportunities.

7. The site of the application for outline planning permission (“the Site”) comprises 3.8 hectares (9.4 acres) of land and is currently a single field in agricultural use. It is immediately to the north of the existing built-up area of Felixstowe. To the south, the Site is bounded by the existing properties in Ferry Road, Conway Close and Swallow Close – two storey houses in Ferry Road are placed side-on to the site, whilst the two storey houses in Conway Close and bungalows in Swallow Close back on to the boundary. A public footpath runs across the southern side of the Site, immediately to the rear of the gardens of the properties to the south, linking Ferry Road to Hyem’s Lane and appears to be well-used.
8. To the east of the Site, Ferry Road marks the eastern edge of the site. On the opposite side is Laureate Fields, a residential development of 195 new homes that is still under construction. The new homes face towards the street, forming one side of the street scene and anticipating the creation of a similar relationship when the application site is developed.
9. To the west of the Site is land that is also in agricultural use, although it is also allocated for development in the Suffolk Coastal Local Plan. Policy SCLP12.3 secures the creation of the North Felixstowe Garden Neighbourhood, containing leisure uses, green infrastructure, community facilities, a primary school and employment uses alongside 2000 new homes. 560 homes in the centre of the site already benefit from outline planning permission but there is no scheme in place for the western end of the scheme that abuts the application site; the illustrative masterplan in the local plan indicates that there will be built development against the shared boundary and highlights the potential to create a vehicle link between the two sites.
10. Both the Site and the garden neighbourhood are enclosed on their northern sides by Gulpher Road, although it is not envisaged that it will be used to provide vehicle access (it is already designated as a “quiet lane”), it will become the new northern edge of Felixstowe and will mark the boundary between the built-up area of the town and the countryside that runs down to the Deben estuary.
11. The Site, along with the land to either side where the town is expanding, sits at the top of a small hill and is relatively flat, with the land sloping away to the north and dropping gently to the west. The site is relatively inconspicuous in the surrounding landscape, with trees, buildings and the topography of the area blocking any medium or long distance views at the same time as it merges into the backdrop formed by the existing edge of the town. There are no distinctive landscape features within the site, other than the public footpath and some trees on the edges that are remnants of former field boundaries.
12. The Location Plan submitted with the application for outline planning permission is attached as Appendix A.

## Planning Policy Context

13. Section 38 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to determine an application for planning permission in accordance with the development plan unless material considerations indicate otherwise. The statutory development plan for the Felixstowe area of East Suffolk Council is the Suffolk Coastal Local Plan.
14. The local plan contains a site-specific policy that allocates the Site for residential development of approximately 150 dwellings by *Policy SCLP12.4: Land North of Conway Close and Swallow Close, Felixstowe*. The policy carries forward the same allocation from Policy FPP5 in the Felixstowe Peninsula Area Action Plan (2017), which was superseded by the new local plan that was adopted in September 2020. The Proposals Map shows the site as within the Settlement Boundary (*Policy SCLP3.3: Settlement Boundaries*) but not subject to any other designation, although the western side abuts the allocation for residential-led mixed-use development at the North Felixstowe Garden Neighbourhood (*Policy SCLP12.3*) and land beyond the field to the north and the residential area to the east forms part of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB).
15. Policy SCLP12.4 reviews the site and its setting, confirming that it can create a natural extension to the built-up area of Felixstowe without causing a detrimental impact to the Area of Outstanding Natural Beauty or harming important views of the Deben Estuary. The supporting text notes that the potential impact of development within the site on the natural beauty and special qualities of the national designation require appropriate mitigation measures to be delivered within the site so that the landscape is conserved and enhanced. The policy also considers technical issues, including the creation of a scheme at a scale that is sympathetic to the adjoining properties to the south – the policy makes specific reference to the “low rise nature of the area” in the context of the transition from the existing streets to the countryside.
16. The policy also secures on-site and off-site open space provision, although the mix between the two is not defined: “developers will be required to consider local needs and requirements as part of their proposals alongside the nationally published standards of 2.4 hectares per 1000 population”. Reference is also made to the relationship with the Grade II listed building at Park Farm Cottages and the potential for archaeological remains to be found, which could dictate the position of open space within the site. Other issues identified by the policy include an upgrade to Footpath 8 as part of the promotion of sustainable forms of travel and creating circular recreational routes, addressing cumulative traffic generation and air quality whilst maintaining the status of Gulpher Road as a quiet lane, connections to and from the North Felixstowe Garden Neighbourhood, delivering primary and secondary school places for residents of the new homes, provision of waste water recycling capacity and the inclusion of a detailed Flood Risk Assessment within an application for planning permission, and funding for improvements at Felixstowe’s library and railway station.

17. The full text of the policy reads:

*“Policy SCLP12.4: Land North of Conway Close and Swallow Close, Felixstowe*

*3.83ha of land to the north of Conway Close and Swallow Close as shown on the Policies Map, is identified for approximately 150 residential units. Development will be expected to accord with the following criteria:*

- a) Affordable housing provision to be in line with Policy SCLP5.10;*
- b) A site-specific Flood Risk Assessment;*
- c) A range of housing types (including bungalows) and tenures in keeping with surrounding area and in line with Policy SCLP5.8;*
- d) Highway design which provides for appropriate vehicular access to the Garden Neighbourhood;*
- e) Maximum building height of 2 storeys;*
- f) Development will need to be high quality and sympathetic to the surrounding character of the area and Listed Building at Park Farm Cottages to the west of the site;*
- g) On site open space and play facilities to meet needs identified in the Suffolk Coastal Leisure Strategy and to provide opportunities for all ages to be active;*
- h) An Air Quality Assessment will be required, and any necessary mitigation provided;*
- i) An Archaeological Assessment is required;*
- j) Evidence is required to demonstrate there is adequate Water Recycling Centre capacity or that capacity can be made available;*
- k) Green infrastructure to be complementary to the green infrastructure provided at Felixstowe Garden Neighbourhood;*
- l) Creating links to the existing public rights of way network including upgrading Footpath 8 so as to allow cycling and to provide a circular route;*
- m) A financial contribution towards the provision of a new primary school and new early years settings in Felixstowe;*
- n) A Landscape and Visual Impact Assessment will be required, and any mitigation provided, including a lighting strategy to conserve and enhance the Natural Beauty and Special Qualities of the Area of Outstanding Natural Beauty; and*
- o) Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.”*

18. Detailed development management policies in the local plan also apply to the Site and will be used to determine the application for outline planning permission. Where these relate to the assessment of the impacts of the proposed scheme, they are described in detail in the ES.

19. The site and the surrounding area are not subject to the designation of a Neighbourhood Plan Area, therefore there are no neighbourhood-level policies that need to be addressed.

## Description of the Proposed Development

20. The Site is allocated for residential development in the Suffolk Coastal Local Plan through Policy SCLP12.4: *Land North of Conway Close and Swallow Close, Felixstowe*. The application for outline planning permission proposes to create up to 150 new homes, associated infrastructure and open space on the Site. All matters except for access are reserved, leaving the details of appearance, layout, scale and landscaping to be addressed at a later date. It is intended that the whole site will be in residential use or uses ancillary to the residential use, such as public open space and soft landscaping. A single point of vehicle access is proposed to be fixed, on the frontage to Ferry Road and offset to the north of the new junction with Ranson Road, with a footway to be added on the west side of the street to match the new provision already in place on the east side, delivered as part of the scheme for Laureate Fields.
21. The description of development on the application form reads:

*“Application for outline planning permission to create up to 150 new homes, associated infrastructure and open space.”*
22. An illustrative layout (“Concept Layout”) has been prepared to help guide the assessment of the site in the supporting reports and to confirm the likely position of elements of the infrastructure. It is attached to this statement at Appendix B. The detailed site layout, the number of new homes and the character and appearance of the properties will be addressed as part of the submission of the reserved matters after the outline planning permission has been granted.
23. Across a site area of 3.8 hectares (9.4 acres), a scheme at the upper level of 150 dwellings equates to a density of 39.5 dwellings per hectare (16.0 dwellings per acre).
24. The application for planning permission is supported by the following information, which is assessed by the ES and as part of the EIA:
  - (a) Covering letter
  - (b) Application form, ownership certificate and CIL form
  - (c) Location Plan, GN003-PH2-LP-01 rev. B
  - (d) Site Entrance General Arrangement, 66200838-SWE-ZZ-XX-DR-ZZ-010 P01
  - (e) Concept Layout, GN003-CPT-01
  - (f) Arboricultural Impact Assessment (28 January 2021)
  - (g) Archaeological Desk-based Assessment (December 2020)
  - (h) Design and Access Statement (June 2021)
  - (i) Detailed Air Quality Assessment (26 April 2021)
  - (j) Flood Risk Assessment and Drainage Statement (23 April 2021)
  - (k) Health Impact Assessment (June 2021)
  - (l) Heritage Statement (April 2021)
  - (m) Interim Residential Travel Plan (12 February 2021)
  - (n) Landscape and Visual Appraisal (June 2021)
  - (o) Planning Statement (June 2021)

- (p) Preliminary Ecological Appraisal (27 April 2021)
- (q) Statement of Community Involvement (June 2021)
- (r) Tier I Contamination Risk Assessment (19 January 2021)
- (s) Transport Assessment (12 February 2021)
- (t) Utility Services Report (27 April 2021)

25. The pack of supporting information has been informed by work undertaken by the applicant and their team of consultants, including ongoing dialogue with East Suffolk Council, Suffolk County Council and other key stakeholders, and through responses to the consultation exercise held prior to the submission of the application for outline planning permission.

### *Residential*

26. The Concept Layout shows the net developable area of the residential use at approximately 3.0 hectares, which includes access roads and circulation areas, infrastructure, incidental open space and landscaping. The application for outline planning permission proposes the creation of up to 150 new homes, but no housing mix is proposed, although it is anticipated that *Policy SCLP5.8: Housing Mix* will be applied at the reserved matters stage. The policy expects that proposals for residential development will deliver the housing needed for different groups in the community that are identified in the Strategic Housing Market Assessment, including a focus on smaller dwellings with one or two bedrooms and contributing to meeting the significant need for housing for older people through the delivery of at least 50% of the new homes as accessible and adaptable under Part M4(2) of the Building Regulations. The allocation of the site in *Policy SCLP12.4* makes reference to bungalows being part of the range of housing types to be created on the site.
27. It is also expected that one in three of all the new homes on the site will be designated as affordable housing; this will be in line with *Policy SCLP5.10*, which sets a tenure split of 50% affordable rent and/or social rent, 25% shared ownership and 25% discounted home ownership. With outline planning permission sought for up to 150 new homes, affordable housing provision will stand at up to 50 new homes. A minimum of 5% of the scheme (up to 8 new homes) will be self build or custom build housing, delivered as serviced plots and marketed for a minimum of one year, in line with *Policy SCLP5.9*.
28. No parameter plans are proposed to be approved within the application for outline planning permission; the allocation of the site for development by *Policy SCLP12.4* means that they are not needed. With regard to scale and building heights, part (e) of *Policy SCLP12.4* dictates that the new homes cannot exceed two storeys. In terms of density of development, the cap of 150 dwellings on a 3.8 hectare site dictates that the density cannot exceed 39.5 dwellings per hectare, which is in keeping with the character of the streets to the south and east.



### *Open space*

29. The Concept Layout shows the provision of public open space in the north eastern corner of the site to take advantage of the land needed to accommodate infrastructure below ground level as part of the sustainable drainage scheme. A detailed design will be proposed at the reserved matters stage; it is expected that play provision will be incorporated into the open space to create a new facility for the residents of the site that will also serve the streets to the east and south, and that tree planting will mark the edge of Ferry Road and Gulpher Lane to mark the new edge of the built-up area of the town.

### *Transport and access*

30. A single point of vehicle access is proposed, confirming that the route for vehicles entering and leaving the site will be on Ferry Road, just to the north of halfway along the eastern boundary. The existing footpath on the western side of Ferry Road will be extended as far as the junction, which will be designed to accommodate a 5.5 metre wide carriageway, 1.8 metre wide footways and a kerb radius of 6.0 metres. Care has been taken to ensure that the junction can operate safely, with sufficient visibility in place to allow the junction to operate safely, including forward visibility splays within the new public realm.
31. A route through the western boundary is shown on the Concept Layout, responding to part (d) of Policy SCLP12.4 and the requirement for highway design to provide appropriate access to the North Felixstowe Garden Neighbourhood. The Concept Layout also shows Footpath 12, along the southern boundary and immediately to the rear of the existing properties in Conway Close and Swallow Close, retained on its definitive alignment and with space provided so that it can be upgraded as cycle access to the garden neighbourhood, in line with part (l) of Policy SCLP12.4.

### *Drainage*

32. The whole site is in Flood Zone 1 and therefore satisfies the sequential test for the location of a “more vulnerable” land use. The drainage strategy submitted with the application for outline planning permission shows that all surface water can be discharged to a soakaway within the site and that there is no need for a connection to existing drainage, whilst the foul water system will connect to a new pumping station in the north western corner of the site that links to the upgraded sewers which were laid as part of the development of Laureate Fields, to the east of Ferry Road.

## Alternatives and Design Evolution

33. Schedule 4 of the EIA Regulations defines the information for inclusion in an Environmental Statement, including “a description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects”.

### *Alternative locations and uses*

34. The Site is subject to an allocation in the adopted Suffolk Coastal Local Plan and is part of the strategy for growth in Felixstowe that is set out in the plan. East Suffolk Council considered alternative locations and sites in the preparation of the local plan, which was subject to a Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA). The Site was identified and supported for development by East Suffolk Council through this process. Policy SCLPI2.4 sets specific development requirements in the site allocation to minimise the adverse effects of development associated with the proposed site allocation and enhance positive effects.
35. In view of the recent adoption of the Suffolk Coastal Local Plan (September 2020) and the allocation of the site for residential development with associated site-specific requirements, no alternative locations or uses for the site have been considered. The applicant controls the site and can deliver the proposed scheme in accordance with the policy requirements and proposed mitigation. Consequently, in accordance with the adopted local plan and supporting SA, it has been established that a residential-led development is considered suitable for the site.

### *Alternative designs*

36. The application for outline planning permission seeks approval for access, with all other matters reserved, leaving the details of appearance, layout, scale and landscaping to be addressed at a later date, after the outline planning permission has been granted. Alternative layouts will be considered at the reserved matters stage, expanding the assessment of the constraints and opportunities undertaken as part of the preparation of the application for outline planning permission that determined the positions of the access point and drainage infrastructure. At this point, the application for planning permission to establish the residential use of the site is the result of a thorough analysis of environmental constraints and opportunities, access and operational issues and market considerations.

### Design evolution

37. A series of consultations with East Suffolk Council, Suffolk County Council, statutory consultees, Felixstowe Town Council and the general public have been a key influence in the Concept Layout's design evolution; further detail is set out in the Statement of Community Involvement and the Design and Access Statement submitted with the application for outline planning permission.

### "Do nothing" scenario

38. The site is allocated for residential development in the local plan, therefore it is considered to be "committed development" for the purposes of this Environmental Statement. A "do nothing" scenario would mean that the site would remain undeveloped and retain the current agricultural use, and that the beneficial and adverse effects outlined in this statement would not occur. As such, the scenario does not form part of the EIA.

## General Approach to Environmental Impact Assessment

39. The purpose of the ES is to identify and evaluate the likely significant environmental impacts associated with the proposed development of the Site. These are then assessed on the basis of the nature of the impact (following mitigation) and the nature of the receiving environment. This determines the significance of their effect. The significance of effect can be determined by taking the magnitude of the likely effect and the sensitivity of the receptor. The significance of the likely effects arising from the proposed development are categorised throughout the ES as set out in Table A:

Table A: general scale for assessing significance

		Nature of receptor sensitivity/environment			
		High	Medium	Low	Negligible
Magnitude of change	High	Major	Moderate to major	Moderate	Minor
	Medium	Moderate to major	Moderate	Minor to moderate	No significance
	Low	Moderate	Minor to moderate	Minor	No significance
	Negligible	Minor	No significance	No significance	No significance

40. The nature of a change will establish whether the change is positive or negative. The significance of change for each factor will be assessed as:
- Nature of change: beneficial, neutral or adverse
  - Magnitude of change: high, medium, low or negligible
  - Sensitivity of receptor: high, medium, low or negligible
  - Duration: short (0 to 5 years), medium (5 to 15 years) or long term (more than 15 years)
  - Permanence: permanent or temporary
  - Evaluation of significance: major, moderate, minor or no significance
  - Level of certainty: absolute, reasonable or uncertain.
41. The assessment of the significance of a change will be primarily based on the magnitude of the change and sensitivity of the affected receptor or environment, with weight also given to the duration of the change and its permanence. The nature of the impacts and the receptors will vary by topic, therefore the criteria used to predict the significance of effects are set out in the methodology section for the chapter addressing each topic area. The methods used to undertake the necessary studies, surveys and/or assessments will also be set out in the same chapter, together with an assessment of potential significant “in-combination” effects included where relevant to each topic area.

#### *Timescales*

42. Construction of the proposed scheme is expected to start in 2023, with the first of the new homes occupied in 2024. It is estimated that around 50 homes can be completed and occupied per annum and that the construction works will be completed in 2026, with the residential use following in perpetuity thereafter.

#### *Topics considered*

43. A request for a formal scoping opinion was submitted to East Suffolk Council on 14 September 2021 and considered under reference DC/21/4329/EIA (a copy is included in Volume III of the EIA at Appendix 6.1). East Suffolk Council provided a Scoping Opinion on 28 January 2022 (a copy is included in Volume III of the EIA at Appendix 6.2). The opinion confirms the topics that are “scoped in”, “scoped out” and the consultees involved in the preparation of the opinion.
44. A summary of the currently known environmental baseline for the inclusion of topics in the EIA (“scoping in”) is set out in part 7 of the Scoping Report and East Suffolk Council confirmed in their Scoping Opinion that the selection of topics was correct, and that the topics included in the ES are:
- (a) Landscape and visual effects
  - (b) Biodiversity and ecology
  - (c) Transport and access

45. A summary of the environmental baseline and justification for the “scoping out” of each topic is provided in part 8 of the Scoping Report and East Suffolk Council confirmed in their Scoping Opinion that the topics did not need to be assessed in the statement. The topics excluded from the scope of the ES, ie. “scoped out” are:
- (a) Agriculture, minerals and ground conditions
  - (b) Air quality
  - (c) Arboricultural impact
  - (d) Climate change
  - (e) Flood risk and drainage
  - (f) Heritage
  - (g) Human health
  - (h) Socio-economics
  - (i) Utilities

### **Summary of Assessment of Significant Effects**

46. The assessment of the impact of the proposed scheme identified the significant environmental effects, the main mitigation measures and any notable residual effects for the three topic areas, with a subsequent review of any cumulative impacts.

#### *Landscape and visual effects*

47. Chapter 7 of the ES assesses the likely significant effects of the proposed development on the environment with regard to landscape and visual effects, considering both the construction phase (Year 1) and the operational phase (Year 15). The effects at Year 15 are considered to be permanent.
48. A Landscape and Visual Impact Assessment has been undertaken by Southern Ecological Solutions (SES), identifying sensitive features in and around the Site, the potential effects on them, and proposes mitigation in terms of layout design and landscaping at the reserved matters stage to reduce the effects.
49. The Site is not subject to any landscape designations or protected areas, although it is adjacent to the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and Heritage Coast – the boundary is approximately 200 metres to the east and 500 metres to the north. There are also three Grade II listed buildings close to the site, with Park Farm Cottages directly against the north western corner of the Site, Laurel Farm approximately 300 metres to the north east and Gulpher Hall 800 metres to the north west. The surrounding area incorporates a good network of public rights of way, linking the edge of the town with the countryside to the north of Felixstowe, delivering recreational routes.

50. The topography of the area comprises a flat to slightly undulating plateau which sits above the marshland to the north that is part of the valley of the River Deben. The Site sits at approximately 19 metres AOD, with land falling dramatically to the north some 500 metres away beyond the ridge which runs from Rue's Farm in the east and towards Gulpher Hall in the west, separating the Site from the Deben Valley to the north east. An undulating area around Gulpher Hall brings the lower land towards the town. Beyond this ridge lies marshes and low-lying arable land all within the coastal levels which follow the 5 metre AOD contour at this point. To the east and south east, the land falls away relatively gently to the shoreline with the town predominantly sitting between 5 metres and 20 metres AOD. A slightly higher plateau sits to the south and south west of the site at 20 metres AOD and above.
51. Landscape effects and townscape effects are considered separately, but in both cases, the principal changes will occur within the Site and in the area immediately surrounding it. The character of the Site will change from a field in agricultural (arable) use to a residential area comprising buildings, streets and open space and although the detailed design will be submitted for approval at the reserved matters stage, the Concept Layout submitted in support of the application for outline planning permission establishes the strategic principles of the proposed scheme in parallel to the planning policy requirement that no buildings will be greater than two storeys in height.
52. The existing vegetation around the boundary of the Site will be retained and enhanced with new open space and native hedgerow and tree planting to create a visual and ecological buffer that will create the setting for the new homes. The landscape effects at the Site are assessed as moderate adverse at Year 1 (reflecting the clearance of landscaping to provide access and the loss of the agricultural use at the beginning of the construction stage) and reduce to minor adverse by Year 15 (responding to the establishment of the new landscape framework that provides the setting for the new homes). While there is change, residential development would not be uncharacteristic within the context of the surrounding area. The site is well related to the surrounding built form and the change in the character of Gulper Lane, from rural lane to settlement edge, will be partially mitigated by open space and new planting, delivering a softer edge that better integrates the town into the landscape than the current boundaries of the existing homes in Conway Close and Swallow Close.
53. The development of the Site would result in a minor reduction in the physical buffer between the built-up area of Felixstowe and the AONB. However, development would be no closer than recent development to the east (Laureate Fields) and would not result in a direct loss or impact in the natural beauty and special qualities of the AONB. The effects of the proposed scheme will reduce over time as vegetation, street trees and planting mature to complement the built form and increase the level of vegetation cover within the Site therefore while the development would still be discernible, it would be a minor change with a very minor effect on the AONB.

54. The impact on townscape elements finds the magnitude of change ranges from low neutral to beneficial and, subject to the detailed design at the reserved matters stage, the council's development management planning policies will ensure that the detailed scheme at the reserved matters stage will complement the character of the area. It provides opportunities to establish a softer settlement edge, an increase in the level of vegetation cover, building heights that match the adjoining streets, connections into the existing movement framework and a development with a distinctive character and range of attractive spaces that enhance the edge of settlement location.
55. The visibility of the Site was determined by a manual assessment of topography and aerial images followed by a field survey of the study area. Twenty viewpoints were agreed with East Suffolk Council, divided into representative views (showing views from a wider area, such as a typical view from a group of houses, along a street or a public right of way) and illustrative views (demonstrating a particular effect or issue, such as limited visibility in an area where views might normally be anticipated), using winter and summer views where appropriate and delivering six photomontages to show the broad extent, scale and massing of the scheme in its context at Year 1.
56. The nature of visual effects is subjective and whilst the loss of open land to new development can be judged as having a negative visual influence, the Site is visually well-related to the existing settlement and the majority of viewpoints see it in the context of the existing buildings on the edge of the town. The principal visual effects will be experienced from the receptors within and immediately adjacent to the Site and the nature of these views will change, with the open field on the settlement edge replaced with housing, streets and open space. The visual effect on the existing properties and Footpath 12 to the south is assessed as major-substantial adverse at Year 1, reducing to moderate-substantial adverse in Year 15 as the landscaping matures. From the north and east, where views are already dominated by the settlement edge, the visual effect on existing properties and road users stands at moderate to minor adverse in Year 1 and reduces to moderate, minor or negligible adverse or neutral at Year 15, also benefitting from the mitigation provided by the retention of existing vegetation, the new open space and the set back of the built form, and new planting reaching maturity. The assessment also confirms that the development of the Site presents the opportunity to create a positive landscape feature and focal point where Ferry Road meets Gulpher Lane.
57. Further to the west, when viewed from the wider landscape, the visual effect depends on the distance from the Site. From the public footpaths immediately to the west, the open boundary means that the new homes will be clearly apparent in Year 1 (moderate adverse) but this will reduce in Year 15 when the North Felixstowe Garden Neighbourhood is developed and creates a new context for the paths (minor neutral). Further west, the topography and vegetation around Park Farm already mitigates the visual impact by limiting the views and from Gulpher Farm the Site is assessed to be unlikely to be discernible because of tree coverage: effects at Year 1 are moderate to low adverse and become minor neutral to negligible over time. No change is anticipated to views from the AONB and the River Deben valley.



58. Primary mitigation will build on the framework provided by the Concept Plan, with the ES setting out a planting strategy (retention of existing boundary vegetation, new strategic planting and use of large tree species to manage skyline effects), an open space strategy (provision at the corner of Ferry Road and Gulpher Road to manage intervisibility with the AONB), an urban design strategy (maximum building heights with a reduced scale on the northern boundary, visual breaks to the skyline from the west and avoidance of rear garden clutter to public edges) and principles for building design and materials (use of traditional forms and materials, including reference to Suffolk Coast & Heaths AONB publication *Guidance on the Selection and use of Colour in Development*, July 2018).
59. Secondary mitigation relates to the long term management of the completed scheme, including the delivery and implementation of a Landscape and Ecological Management Plan to maintain and retain the strategic vegetation. The timing of the delivery of landscaping in the construction phase is also considered, with a view to it being delivered as soon as possible.
60. Potential mitigation to be embedded into the North Felixstowe Garden Neighbourhood is also recommended to minimise landscape and visual impacts, including leaving the northernmost part of the site undeveloped in order to retain views of the estuary and AONB, restricting building heights, breaking up the massing of the built form and setting back built form from the new settlement edge by using detached homes to deliver a lower density of development.
61. All effects identified fall within the geographical area of the assessment; beyond the study area there would be no landscape or visual effects. These effects are entirely consistent with residential development on land previously in agricultural use.

#### *Biodiversity and ecology*

62. A series of ecology surveys were undertaken on the Site between 2020 and 2022 including a Preliminary Ecological Appraisal (including desk study, UK Habitat Classification, Preliminary Tree Roost Assessment for bats, and Habitat Suitability Index Assessment for great crested newt, and other species scoping surveys), wintering bird surveys and breeding bird surveys.
63. Nine internationally designated sites, three nationally designated, and two non-statutory designated sites are located within the Zones of Influence of the Site. A shadow Habitat Regulations Assessment to inform an Appropriate Assessment by the competent authority (East Suffolk Council) has been undertaken to assess the impact of the development on the internationally designated sites and their constituent Sites of Special Scientific Interest. It stands separately from the EIA but has been used to assess the impact of the proposed scheme on these wildlife designations.



64. The impact assessment found that in the absence of appropriate mitigation, significant adverse effects could occur to Landguard Common Site of Special Scientific Interest as well as Kings Fleet and Felixstowe Ferry County Wildlife Sites. These adverse effects can be avoided and mitigated through provision of an on-site dog walking route and off-leash area, together with provision of information to new residents regarding nearby public rights of way and alternatives recreational activity at the coast. Elements will be delivered through the *Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy* (RAMS). The scale of development and the relationship with the North Felixstowe Garden Neighbourhood means that there may be a requirement to deliver Suitable Alternative Natural Greenspaces (SANG) when the land adjoining the Site is developed and the footpaths through the garden neighbourhood are subsumed into the built-up area and existing circular walking routes are severed.
65. The field surveys found the site to predominately comprise arable crop with a native hedgerow (priority habitat) boundary, modified grassland margins, and lines of native and non-native trees. The impact assessment found that significant adverse effects are likely to occur to the hedgerow, although this can be mitigated by protecting the retained hedgerow during the construction phase and compensated by planting new hedgerow along the site boundary that will mature during the operational phase.
66. The species scoping surveys found the site to have potential to support low numbers of widespread reptiles, breeding and nesting birds, foraging and commuting bats, badger, hedgehog and brown hare. The breeding bird survey identified one skylark breeding territory over the arable crop, while the wintering bird survey found the site had limited value for wintering birds. The impact assessment found that significant adverse effects may occur to reptiles, breeding birds (including skylark), badger, hedgehog, and brown hare. Adverse effects can be mitigated and compensated through good working practices and appropriate timing of habitat removal under Ecological Clerk of Works supervision, pre-commencement walkovers to check for badger and brown hare activity, protection of retained habitats during the construction phase, provision of two short term skylark plots on nearby arable land, and native species habitat creation and management on-site. Lighting design is a matter to be addressed at the reserved matters stage and a condition can be added to the outline planning permission to ensure that there will be no increase in artificial lighting on the boundary hedgerow.
67. It is recommended that a Construction Environmental Management Plan (CEMP) is produced to guide good working practices and mitigation during the construction phase of the scheme, while a Landscape and Ecology Management Plan (LEMP) should be produced to guide habitat creation and management on and off-site during the operational phase. Ecological enhancement opportunities are recommended by the ES, including calculations to target  $\geq 10\%$  biodiversity net gain on-site via a Biodiversity Net Gain Plan secured by a condition attached to the outline planning permission or through the LEMP.
68. Residual effects can be managed through the CEMP and LEMP, with adjustments made to ensure that mitigation is focussed and effective.

69. All effects identified fall within the geographical area of the assessment; beyond the study area there would be no biodiversity or ecology effects. These effects are entirely consistent with residential development on land previously in agricultural use.

#### *Transport and access*

70. The impact of the proposed scheme on seven sensitive receptors is assessed by the ES: Kingsfleet Primary School, Colneis Junior School and residential properties on five streets.
71. The construction phase will generate short-term, temporary increases in vehicle movements on the highway in the vicinity of the Site, although the level of construction traffic generation would not be constant throughout the construction period and would vary depending on the specific details of the construction strategy, construction type and phasing. The assessment anticipates an average of 68 construction vehicle movements per day with 7 construction vehicle arrivals and 7 construction vehicle departures in the morning and evening peaks. Construction traffic is predicted to have a slight adverse effect.
72. Construction staff will travel independently of the construction traffic and arrivals and departures by car are likely to be clustered around the shift start and finish times, which will be outside the peak hours. Construction staff travelling by car are expected to lead to a slight adverse effect.
73. Temporary disruption from vehicles associated with the construction phase, and HGVs in particular, has the potential to affect pedestrians and cyclists using the highway network close to the site. The effects on pedestrian and cyclist movement and amenity are identified as short term, local and slight adverse. Negligible effect is identified on public transport capacity, although the same slight adverse impact on the public waiting at bus stops is identified.
74. The operational phase is assessed to generate 149 person trips in the morning peak and 128 person trips in the evening peak. Against a very low volume of flow on Ferry Road outside the site, this appears to be a substantial increase in traffic levels but in the context of the receptors the traffic generation will have a negligible impact.
75. The delivery of a new footway on the west side of Ferry Road that will connect the site into the existing footway network to the south of the site and on into Old Felixstowe will meet demand from pedestrians and the scheme will have negligible effect on pedestrian movement. The likely significant effects in relation to pedestrian severance, delay, fear and intimidation and amenity on Ferry Road are all found to be negligible.
76. Cycling and public transport use are also found to have a negligible effect on the capacity of the existing networks in the town.

77. To mitigate the potential impacts at the construction stage, it is expected that a full Construction Logistics Plan (CLP) would be secured via an appropriately worded planning condition or obligation would contain details of the size, type and frequency of vehicles visiting the Site, strategies for minimising the number of workforce trips and other measures to minimise the impact on noise, air quality and transfer of material onto the highway. The maximum range of working hours will be from 08:00 until 18:00 between Monday and Friday and weekend working is not anticipated. Access to the site will be from the A14, A154 and Colneis Road, with construction access via Gulpher Lane or the section of Ferry Road that runs up from the coast. Delivery booking systems shall be employed to ensure vehicles coming to the Site are managed effectively and efficiently in a timely manner and construction traffic entering the site will not be allowed to queue back on to Ferry Road: contractors will enforce strict delivery collection times and limit vehicle movements to avoid contributing to congestion and risk to any vulnerable pedestrians and cyclists. Construction traffic passing through a predominantly residential area means that residual effects are categorised as slight adverse.
78. Mitigation at the operational stage is restricted to the benefits already identified as part of the proposed scheme for the development of the site: a new footway to the west side of Ferry Road, improvements to Footpath 12 along the southern boundary, and an upgrade to Footpath 8 to create a circular route. The effects of the proposed scheme are identified as negligible, therefore any residual effects will also be negligible.
79. All effects identified fall within the geographical area of the assessment; beyond the study area there would be no transport or access effects. These effects are entirely consistent with the construction and subsequent operation of estate-scale residential development.

#### *Cumulative effects*

80. Two synergistic impacts are identified at the construction stage, although they relate to the change from residential use and are not a direct impact of the construction activities. Where impacts are identified in relation to the scoped-in topics, they relate to separate elements of the proposed scheme and do not combine to create a greater effect.
81. When the new homes are occupied (the operational stage), the residual effects are expected to deliver two synergistic impacts. The landscape and visual impact remains tied to the significant change in character, which is inevitable when a field in agricultural use changes to a residential area comprising buildings, streets and open space. However, these changes can be mitigated by careful landscape design and the creation of an appropriate and respectful site layout, with the opportunity to deliver beneficial effects by establishing a softer edge to the settlement

82. Impacts on international and national wildlife designations are identified where pressure for recreation and dog walking is created by residential development and an additive impact is anticipated. However, this is an existing issue and covers a substantial zone of influence across south and east Suffolk and the council has already adopted the *Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)* to address the impact of all new residential development, beyond the scope of the reasonably foreseeable development considered by the ES.
83. Where a cumulative impact is identified on nesting birds and badgers at the construction stage, the cumulative, in-combination impacts from the proposed scheme and the other reasonably foreseeable developments are not estimated to be more significant than the residual impacts from the proposed scheme in isolation. It is reasonable to expect that appropriate ecological mitigation measures are instigated as part of a comprehensive CEMP for each development, in line with best practice, therefore the additive impact will be no greater than the individual impacts of each site.

### Next steps

84. Following the submission of the EIA to East Suffolk Council as a formal update to the application for outline planning permission (reference DC/21/2710/OUT), the applicant is responsible for publicising the ES. The applicant will publish notices in the local press, alongside serving notice to those persons and bodies who would otherwise be unaware of the ES and who may have an interest in, or be affected by, the proposed development.
85. The submission of the ES to East Suffolk Council will be accompanied by a copy of the notice and a certificate stating that the publicity arrangements have been met. The council retain responsibility to send copies of the ES to any statutory consultees that have not received a copy direct from the applicant and to make the ES and any other relevant documents available on their website.
86. Following the submission of the ES, there will be a period of consultation during which interested parties can submit comments on the proposed scheme to East Suffolk Council. The council cannot determine the application for outline planning permission during the period of 30 days beginning with the date on which the ES (and accompanying documents) are published.
87. Details of how copies of the ES can be obtained are set out in paragraphs 4 and 5 of this document.

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**Non-Technical Summary: Appendices**

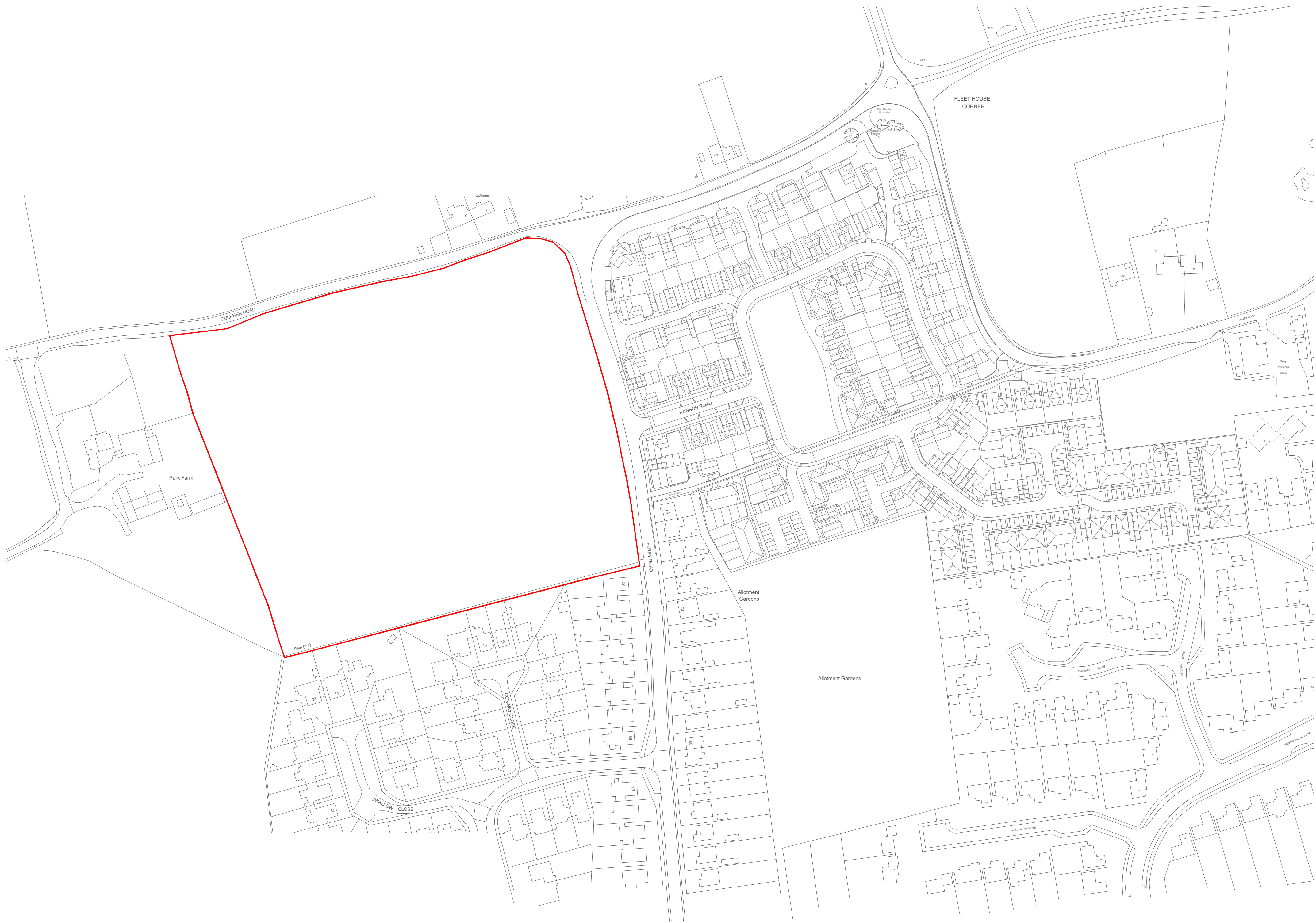
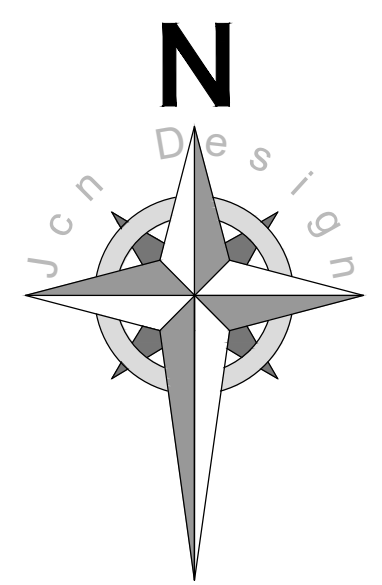
Appendix A      Location Plan, drawing number GN003-PH2-LP-01 rev. B

Appendix B      Concept Layout, drawing number GN003-CPT-01

## Appendix A

Location Plan, drawing number GN003-PH2-LP-01 rev. B





Project:-  
**Land West of Ferry Road, Felixstowe, Suffolk**

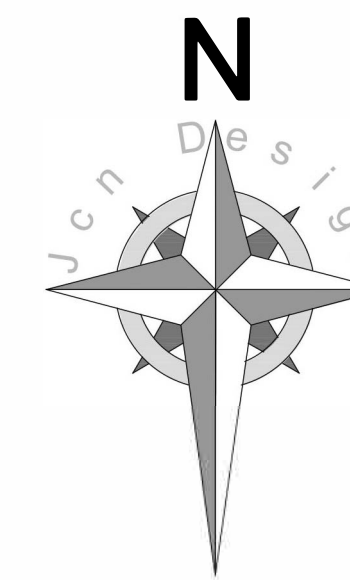
Description:-  
**Location Plan**



## Appendix B

Concept Layout, drawing number GN003-CPT-01





Legend

- Public Right of Way
- Site Boundary
- Illustrative Trees
- Existing Vegetation

Project:-  
**Land West of Ferry Road, Felixstowe, Suffolk**

Description:-  
**Concept Layout**

Drawing number:- GN003-CPT-01    Drawing Scale:- 1-500 @ A1    Revision:- 00

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