



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

ENVIRONMENTAL STATEMENT VOLUME II

October 2022

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I. Introduction

Background

- I.1 JCN Design & Planning has been commissioned by Generator Optima (Ferry Road II) Ltd. to co-ordinate an Environmental Impact Assessment (EIA) in relation to development proposals on the land to the north of Conway Close and Swallow Close, Felixstowe. This EIA has been carried out in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- I.2 This Environmental Statement (ES) is submitted as part of the application for outline planning permission to create up to 150 new homes, associated infrastructure and open space (application reference DC/21/2710/OUT).
- I.3 The application site comprises 3.8 hectares of land and is currently a single field in agricultural use. The site is wholly within the administrative boundary of East Suffolk Council.
- I.4 Policy SCLP12.4 in the Suffolk Coastal Local Plan (adopted September 2020) allocates the site for the creation of approximately 150 new homes provides the policy context and sits alongside fifteen criteria that the development must comply with. Immediately to the west, the adjoining land is also allocated for development by Policy SCLP12.3 as a mixed use scheme to create leisure, green infrastructure, community facilities and employment land alongside residential development.

Purpose of EIA

- I.5 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (referred to as the EIA Regulations) implement European Council Directive No 2011/92/EU (as amended by Directive 2014/52/EU) on the assessment of the effects of certain public and private projects on the environment (the EIA Directive), and which requires that before consent is granted for certain types of development, an Environmental Impact Assessment (EIA) must be undertaken.
- I.6 EIA is a process through which the likely significant effects of a proposed development on the environment can be identified and assessed so that they can be taken into account before development is approved. EIA acts as a tool to assist decision makers in considering a proposed development, rather than being a process which determines whether development should or should not proceed. The Planning Practice Guidance explains the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and states that the purpose of EIA is:

“...to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision making process.”

- I.7 Chapter 6: General Approach to EIA provides further detail on the purpose of EIA, the scope of the EIA and the approach to assessments.

EIA Scoping

- I.8 An EIA Scoping Report was submitted to East Suffolk Council on 14 September 2021 and considered under reference DC/21/4329/EIA (a copy of the Scoping Report is attached at Appendix 6.1). East Suffolk Council provided a Scoping Opinion on 28 January 2022 (a copy is attached at Appendix 6.2) that confirmed that the proposed development should be subject to EIA and agreed the scope of the ES.

The applicant and project team

- I.9 The applicant is Generator Optima (Ferry Road II) Ltd, part of a diverse property group working across the real estate sector. Their work spans property development and investment, along with project advice and expert consultancy services. They are currently delivering 195 new homes at Laureate Fields, on the opposite side of Ferry Road.
- I.10 JCN Design & Planning is a multi-disciplinary practice specialising in design, planning and project management that has established a reputation for an innovative to their development schemes. They are the agent for the application for outline planning permission and also prepared the Design and Access Statement, Health Impact Assessment and Planning Statement submitted in support of the proposed scheme. They are also responsible for the preparation of the ES, including the creation of the introductory chapters and summarising the cumulative impacts.
- I.11 The Landscape and Visual Effects chapter of the ES is prepared by Southern Ecological Solutions (SES), a Registered Practice with the Landscape Institute. The company is a multidisciplinary independent business that provides, ecological, arboricultural and landscape design consulting services throughout the UK. They have already prepared the Landscape and Visual Appraisal that is submitted in support of the application for outline planning permission.
- I.12 The ES chapters addressing Transport and Access and Biodiversity and Ecology are prepared by Sweco, Europe's leading design, engineering, environment and regulatory consultancy. The company employs 17,500 designers, engineers and consultancy specialists and the transport and access element of the project is being managed from the company's Ipswich office. They have already prepared the Transport Assessment and Preliminary Ecological Appraisal Report that are submitted in support of the application for outline planning permission.

Structure of the Environmental Statement

I.13 The ES is provided in three parts, which are:

- Volume I: Non-Technical Summary
- Volume II: Environmental Statement main text and accompanying figures
- Volume III: Technical appendices to the ES

I.14 Table I.1 below lists the chapters in Volume II and the consultant responsible for each.

Table I.1: chapters in Environmental Statement Volume II

No.	Title	Consultant
Introductory chapters		
1	Introduction	JCN Design & Planning
2	Site Description	
3	Planning Policy Context	
4	Description of the Proposed Development	
5	Alternatives and Design Evolution	
6	General Approach to EIA	
Technical chapters		
7	Landscape and Visual Effects	Southern Ecological Solutions
8	Biodiversity and Ecology	Sweco Consulting Engineers
9	Transport and Access	Sweco Consulting Engineers
10	Cumulative Impacts	JCN Design & Planning

Availability of the Environmental Statement

I.15 This 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) using reference DC/21/2710/OUT.

I.16 The ES and 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

2. Site Description

- 2.1 This chapter sets out an overview of the site and relevant elements of the local environment. A more detailed description of the aspects of the environment that are likely to be significantly affected by the proposed scheme, including the relevant baseline conditions are provided in chapters 7, 8 and 9 of this Environmental Statement.

Application site and the surrounding area

- 2.2 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.
- 2.3 Felixstowe also benefits from its coastal location, with traditional seaside activities and access to the beach making it an attractive destination for tourists, alongside a strong architectural heritage and high quality buildings from its Victorian heyday. The heritage is demonstrated through the creation of two conservation areas that serve to protect, preserve and enhance the undesignated heritage assets that reflect the Victorian and Edwardian architectural legacy of the resort. Felixstowe is also the location of the largest container port in the UK, delivering a range of jobs and economic activities in the local area as well as supporting the national economy.
- 2.4 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.
- 2.5 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.

- 2.6 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. A new footway has been added to the east side of the street, connecting to the main street into the scheme (Ranson Road) and changing the character of the road, although the path does not proceed beyond the new junction, allowing the former character as a country lane to emerge as part of a transition into the rural area to the north. Laureate Fields was the first phase of the growth of the town to the north, stepping beyond the post-war suburbs, and setting the scene for the allocation of land for residential-led mixed-use development across the whole of the northern side of the built-up area.
- 2.7 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.
- 2.8 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.
- 2.9 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.

Local environment

2.10 The Site is allocated for the 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 is 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). This allocation is reviewed in more detail in chapter 3 of this Environmental Statement.

2.11 With regard to the application site itself:

- The site lies adjacent to the existing built-up area of Felixstowe and does not sit inside the area designated as the Suffolk Coast and Heaths Area of Outstanding Natural Beauty.
- The site is not part of a conservation area.
- The site sits at the top of a small hill and is relatively flat, sitting at 19 metres AOD.
- The National Landscape Character Map of England identifies the site within National Character Area 82: Suffolk Coasts and Heaths.
- A low probability flood zone (Flood Zone 1) covers the site on the Environment Agency flood map, meaning that it is “land having a less than 1 in 1000 (0.1%) annual probability of flooding”; the site is not at significant risk of flooding from tidal or fluvial sources. No significant risk of flooding from surface water, reservoirs of groundwater has been identified.
- Potential archaeological significance has been identified, with the possibility that the site includes an extension to either or both of the Iron Age settlement or medieval settlement already identified as part of the recent residential development on the opposite side of Ferry Road.
- No potential sources of land contamination have been identified.
- Nine trees and two groups are identified within the site, with eight trees designated as BS5837 Category B, one tree and one group as Category C and one group required to be removed and therefore designated Category U.

2.12 Notable aspects of the area around the site include:

- There are twelve internationally important statutory wildlife designations with ten kilometres of the site (Deben Estuary Ramsar and Special Protection Area (SPA), Alde-Ore Estuary Ramsar and SPA, Hamford Water Ramsar, SPA and Special area of Conservation (SAC), Stour and Orwell Estuaries Ramsar and SPA, Alde-Ore & Butley Estuaries SAC, Orfordness-Shingle Street SAC, Sandlings SPA).
- In addition, within three kilometres of the site there are two nationally important wildlife designations (Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) and Deben Estuary Site of Special Scientific Interest (SSSI)).
- The nearest non-statutory wildlife designations, within two kilometres of the site, are the Felixstowe Ferry County Wildlife Site (CWS) and King's Fleet CWS.
- The Grade II listed buildings at Park Farm Cottages are immediately to the north west of the site, having been converted into a pair of cottages from the farmhouse in the early 20th Century. Some 300 metres to the north east of the site is the Grade II listed building at Laurel Farm, while the Grade II Listed building at Gulpher Hall is some 800 metres to the north west.
- The topography of the area comprises a flat to slightly undulating plateau which sits above the marshland to the north associated with the Deben River valley. The site sits on the plateau, 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.
- The nearest Air Quality Management Area (AQMA) is 13 kilometres from the site. However, a small AQMA was designated close to the Port of Felixstowe (Dooley Inn AQMA) between 2009 and 2016, although it was revoked through emissions reductions projects undertaken at the port.

3. Planning Policy Context

- 3.1 This chapter describes the national and local planning policies that are relevant to residential development at the site, providing the basis for the subsequent assessment of the likely impact of the proposed scheme against key planning policies, strategies and objectives. Specific legislation, standards, guidelines and best practice that are applicable to the topics that have been “scoped in” to this Environmental Statement are set out in their specific chapters.
- 3.2 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 East Suffolk Council is:
- National Planning Policy Framework
 - National Planning Practice Guidance
 - Waveney Local Plan (March 2019)
 - Suffolk Coastal Local Plan (September 2020)
- 3.3 The Waveney Local Plan is not applicable to the Felixstowe area. The National Planning Policy Framework and National Planning Practice Guidance are material considerations in the determination of an application for planning permission, along with the national guidance on design.

National Planning Policy Framework

- 3.4 The second version of the National Planning Policy Framework (NPPF, July 2018) was revised in February 2019 and all planning policies at a local level should be in accordance with it. However, where policies pre-date the framework, the relationship between national and local planning policy is fluid, with the level of weight given to policies depending on their consistency with the NPPF – in other words, the better the policy reflects the NPPF, the greater the weight that it will be given. *Paragraph 212* confirms that the policies in the framework are material considerations in the determination of applications for planning permission but *paragraph 213* clarifies that existing policies should not be considered out-of-date simply because they were adopted prior to the publication of the NPPF.
- 3.5 *Paragraph 10* states that at the heart of the NPPF is a presumption in favour of sustainable development, which is explained in *paragraph 11*. At the decision-taking stage, this means approving without delay applications for planning permission that accord with an up-to-date development plan. Where there are no relevant development plan policies, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits of the scheme when assessed against the policies in the NPPF taken as a whole.

- 3.6 Achieving sustainable development means that the planning system has three overarching objectives, which are described in *paragraph 8* as:
- a) *Economic* – helping to build a strong, responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity.
 - b) *Social* – supporting strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and by fostering a well-designed and safe built environment.
 - c) *Environmental* – contributing to protecting and enhancing our natural, built and historic environment, including making effective use of land; helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change.
- 3.7 *Paragraph 38* goes on to confirm that decision-makers at every level should seek to approve applications for sustainable development where possible and that local planning authorities should approach decisions in a positive and creative way.
- 3.8 The NPPF states at *paragraph 60* that in order to support central government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed and that to determine the minimum number of new homes needed, strategic policies should be informed by a local housing need assessment (*paragraph 61*) and a strategic housing land availability assessment (*paragraph 68*). *Paragraph 62* also confirms that planning policies should assess and reflect the size, type and tenure of housing needed for different groups in the community.
- 3.9 *Paragraph 92* encourages the creation of healthy, inclusive and safe places, including:
- a) the promotion of social interaction through street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods and through the active street frontages.
 - b) Creation of safe and accessible places through the use of clear and legible public routes, and through the creation of high quality public space that encourages active and continual use.
 - c) Enabling and supporting healthy lifestyles, through the provision of safe and accessible green infrastructure and through layouts that encourage walking and cycling.

- 3.10 In addition, *paragraph 98* confirms that a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and *paragraph 100* notes that public rights of way should be protected and enhanced, taking opportunities to provide better facilities for users. *Paragraph 104* requires that transport issues be considered at an early stage so that potential impacts can be addressed, opportunities to promote walking, cycling and public transport use are identified and pursued, and patterns of movement, streets, parking and other transport considerations are integrated into the design of schemes and can contribute to making high quality places.
- 3.11 *Paragraph 126* states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve and that good design is a key aspect of sustainable development, creating better places in which to live. *Paragraph 130* sets out six standards where planning policies and decisions should ensure that developments:
- a) Function well and add to the overall quality of the area, over the lifetime of the development.
 - b) Are visually attractive as a result of good architecture, layout and landscaping.
 - c) Are sympathetic to local character, including the surrounding built environment and landscape setting, while not discouraging innovation or change.
 - d) Establish a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
 - e) Optimise the potential of the site to accommodate an appropriate amount and mix of development, supporting local facilities and transport networks.
 - f) Create places that are safe, inclusive and accessible, with a high standard of amenity and where crime and disorder does not undermine the quality of life or community cohesion.
- 3.12 Refusal of planning permission for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions is directed by *paragraph 130*, although it goes on to state that where design of a development accords with clear expectations in plan policies, design should not be used as a valid reason to object to development. Conversely, *paragraph 134* states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design. It goes on to note that significant weight should be given to local design policies and government guidance on design, and/or outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

- 3.13 There is a requirement for policies and decision making to promote effective use of land in meeting the need for homes and other uses, whilst safeguarding and improving the environment and ensuring safe and healthy living conditions, set out in *paragraph 119*. *Paragraph 120* goes on to confirm that decisions should encourage multiple benefits from land, opportunities to achieve net environmental gains (including the creation of new habitats), supporting appropriate opportunities to remediate degraded and derelict land, and redeveloping under-used land. *Paragraph 121* states that local planning authorities should take a proactive role in bringing forward land suitable for meeting development needs. Decision-making should support development that makes efficient use of land, as set out in *paragraph 124*, taking account of the need for different types of housing, the availability of land suitable to accommodate it, market conditions and viability, availability and capacity of infrastructure and services (both existing and proposed), scope to promote sustainable travel choices, the desirability of maintaining the character and setting of an area versus promoting regeneration and change, and the importance of securing well-designed, attractive and healthy places. *Paragraph 125* makes clear that it is important that sites are not developed at low densities and that the use of land is optimised.
- 3.14 Care is also needed to contribute to and enhance the natural and local environment, with *paragraph 174* noting that decision making should recognise the wider benefits from natural capital and ecosystem services (including trees and woodland), the need to provide net gains for biodiversity, the requirement for new development to avoid contributing to and being put at risk from unacceptable levels of soil, air, water or noise pollution, and the benefit of remediating and mitigating despoiled, degraded, derelict and contaminated land. Securing measurable net gains for biodiversity via planning policies is also mentioned in *paragraph 179*. *Paragraph 154* goes on to note that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change and should help to reduce greenhouse gas emissions, such as through location, orientation and design. The same principle is applied by *paragraph 157* and the expectation that new development should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption. *Paragraph 167* states that schemes should ensure that flood risk is not increased elsewhere and *paragraph 169* confirms that major developments should incorporate sustainable drainage systems.
- 3.15 Early, proactive and effective engagement is supported by *paragraph 132* and it states that design quality should be considered throughout the evolution and assessment of individual proposals. Reference is also made to early discussions about the design and style of emerging schemes, which is important for clarifying expectations and reconciling local interests and commercial requirements, and to working closely with those affected by proposals to evolve designs to take account of the views of the community. *Paragraph 133* encourages local planning authorities to use tools and processes for assessing and improving the design of proposed schemes, which should be used as early as possible in the evolution of schemes.

Planning Practice Guidance

- 3.16 The NPPF is backed up by the Planning Practice Guidance, an online resource of planning guidance in the form of questions and answers, intended to simplify the suite of separate documents that it replaced. It is actively managed and updated as soon as ministerial statements or a new central government position is issued.

Planning Practice Guidance on Design

- 3.17 The PPG on design has been updated to include several new and expanded sections. These include a newly-added section stating how local authorities can deal with the design of projects at outline permission stage and “ensure the quality of approved development is not materially diminished between permission and completion”.
- 3.18 Local authorities are advised that design can be considered at outline stage to “assist community engagement” and “provide a framework for the preparation and submission of reserved matters proposals”. The guidance states that councils can agree a design code with applicants that will inform decisions on reserved matters applications. Guidance is also provided on how to ensure post-consent design quality is maintained as schemes progress towards completion.

National Design Guide

- 3.19 In October 2019, central government published its inaugural National Design Guide (NDG) alongside newly updated Planning for England Practice Guidance (PPG) on design. The government said the new guide “illustrates how well-designed places that are beautiful, enduring and successful can be achieved in practice”. According to the guide, it is intended to underpin paragraph 130 of the National Planning Policy Framework, which states that permission should be refused for development of poor design.
- 3.20 The guide summarises the government’s priorities for well-designed places in the form of ten considerations:
- 1) Context – the guide states that good design “enhances the surroundings”.
 - 2) Identity – good design delivers “a coherent pattern of development”.
 - 3) Built form – good design delivers “a coherent pattern of development”. The guide states that well-designed places “are walkable” and make “efficient use of land with an amount and mix of development and open space that optimises density”.
 - 4) Movement – well-designed places should be “accessible and easy to move around”.
 - 5) Nature – good design should see nature “enhanced and optimised”.

- 6) Public spaces – such places should “feel safe, secure and attractive for all to use”.
- 7) Uses – sustainable places should include a mix of uses that support everyday activities, including to live, work and play. Developments should be “mixed and integrated” and neighbourhoods “need to include an integrated mix of tenures and housing types that reflect local housing need and market demand”.
- 8) Homes and buildings – well-designed homes and buildings are “functional, accessible and sustainable”.
- 9) Resources – well-designed places and buildings are “efficient and resilient”, and “conserve natural resources including land, water, energy and materials”.
- 10) Lifespan – developments should be “made to last”.

Suffolk Coastal Local Plan

- 3.21 The site is allocated for the development of approximately 150 dwellings by *Policy SCLPI2.4: 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 is 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 SCLPI2.3) 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).
- 3.22 Policy SCLPI2.4 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.
- 3.23 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.

3.24 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.

3.25 The full text of the policy reads:

"Policy SCLP1 2.4: 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."*

- 3.26 The allocation of the site for residential development is part of the plan's role in the economic growth of the Ipswich Strategic Planning Area, with at least 35,334 new homes to be created over the period 2018 to 2036 alongside at least 30,320 new jobs on 49.8 hectares of employment land, in partnership with the county council and the other local planning authorities in the area, as set out in *Policy SCLP2.1: Growth in the Ipswich Strategic Policy Area*. Further co-operation is anticipated by *Policy SCLP2.3: Cross-boundary mitigation of effects on Protected Habitats* with regard to the adopted Recreational Avoidance and Mitigations Strategy. Within the area covered by the Suffolk Coastal Local Plan, *Policy SCLP3.1: Strategy for Growth* confirms that the 150 new homes on the application site are included within the delivery of at least 542 new homes per annum, which equates to a minimum of 9756 across the plan period. Employment, retail, commercial and leisure uses will also be delivered, alongside the required infrastructure and the protection and enhancement of the historic built and natural environments.
- 3.27 Felixstowe is designated as a Major Centre by *Policy SCLP3.2: Settlement Hierarchy* and is therefore paired with the east side of Ipswich as the preferred location for growth, at the top of the settlement hierarchy. Infrastructure to support growth is secured in a timely manner by *Policy SCLP3.5: Infrastructure Provision*, with contributions expected from development to secure what is needed to meet the demand that is generated, including reference to open space, schools, wastewater management, electricity, high-speed broadband and waste management. *Policy SCLP12.2: Strategy for Felixstowe* notes that the vision for the town is that it will retain its role as a thriving coastal resort and a major centre with a comprehensive range of services and facilities, with infrastructure improvements delivered to meet future needs as well as enhancing the quality of life for existing communities and visitors alike. The fourteen-part strategy includes providing residential opportunities “to meet the needs in particular of younger people entering the housing market and those of an ageing population and changing demographic over the plan period” and notes that the North Felixstowe Garden Neighbourhood will be the focus of growth during the plan period.
- 3.28 *Policy SCLP12.3: North Felixstowe Garden Neighbourhood* covers 143 hectares of land to the north of Felixstowe and immediately to the west of the application site, allocated for “comprehensive leisure led development comprising leisure, green infrastructure, community facilities and employment land alongside residential development comprising a mix of housing types, sizes and tenures in a design which creates a dementia friendly environment”, with delivery through a masterplan approach brought forward through landowner collaboration and community engagement. The policy confirms that the scheme will deliver a new leisure centre, 630 primary school places and early years provision, small business units, retirement dwellings and up to 2000 new homes. A connection through the application site to Ferry Road is not specified, although the provision is secured by *Policy SCLP12.4* and the connection will provide residents of the proposed new homes with easy access to the new community facilities on the adjoining land.

- 3.29 *Policy SCLP5.8: Housing Mix* addresses a number of related issues, starting with a requirement that residential development is expected to deliver the housing needed for different groups in the community as identified in the 2017 Strategic Housing Market Assessment for Ipswich and Waveney Housing Market Areas (SHMA), with specific reference to providing a mix of housing tenures, types and sizes appropriate to the size, characteristics and location of the site, reflecting the identified need with particular focus on smaller dwellings. Evidence in the SHMA demonstrates that there is a need for 40% of new homes to be one and two bedroom properties in response to the high demand from first-time buyers and older people looking to downsize. Table 5.1 sets out the area-wide housing need, although the supporting text accepts that provision will need to reflect the character of the surrounding area. In parallel, the policy recognises that there are increasing numbers of older people living in housing that is too large or not suited to their mobility needs, requiring adaptation to make it accessible either through the delivery of smaller and more suitable accommodation or by designing homes so that adaptation can be carried out when the need arises. As such, at least 50% of the new homes within a scheme are required to meet the requirements for accessible and adaptable dwellings set out in Part M4(2) of the Building Regulations. Furthermore, several site-specific allocations specify the mix of accommodation to include housing to meet the needs of older people, with Policy SCLP12.4 requiring that the development of the site delivers bungalows. The supporting text notes that innovative schemes which seek the creation of integrated communities will be supported, with a list of suitable housing types for older people including the use of bungalows or dormer bungalows where there is adequate living accommodation (ie. a bedroom and bathroom) on the ground floor.
- 3.30 One in three homes are required to be designed as affordable housing by *SCLP5.10: Affordable Housing on Residential Developments*, with a defined tenure split of 50% affordable rent/social rent, 25% shared ownership and 25% discounted home ownership, and provision to be made on-site.
- 3.31 Schemes for 100 or more dwellings are expected by *Policy SCLP5.9: Self Build and Custom Build Housing* to provide a minimum of 5% self or custom build properties within the site through the provision of serviced plots. The policy specifies that, once completed and available for development, the serviced plots should be marketed for a period of not less than 12 months in accordance with Appendix E – Key Elements of the Marketing Guidance Best Practice document, which summarises the council's 2016 Commercial Property Marketing Best Practice Guide. If any of the plots remain unsold after this period, they can be built out by the developer.
- 3.32 Chapter 11 of the local plan contains policies relating to the built and historic environment. It notes that design quality is a key principle in the creation of sustainable development and links the council's development management standards back to the central government guidance in the NPPF. The Building for Life 12 assessment process is advocated as a tool to assist with the evolution of design at the pre-application and post-application stages instead of imposing inflexible rules, although *Policy SCLP11.1: Design Quality* provides eleven parameters that must be met for planning permission to be granted:

“The Council will support locally distinctive and high quality design that clearly demonstrates an understanding of the key features of local character and seeks to enhance these features through innovative and creative means.

In so doing, permission will be granted where proposals:

- a) Support inclusive design environments which are legible, distinctive, accessible, comfortable, and safe, and adopt the principles of dementia friendly design;*
- b) Demonstrate a clear understanding of the character of the built, historic and natural environment and use this understanding to complement local character and distinctiveness through robust evidence, informed sources and site specific context and analysis;*
- c) Respond to local context and the form of surrounding buildings in relation to the following criteria:*
 - i. the overall scale and character should clearly demonstrate consideration of the component parts of the buildings and the development as a whole in relation to its surroundings;*
 - ii. the layout should fit in well with the existing neighbourhood layout and respond to the ways people and vehicles move around both internal and external to existing and proposed buildings;*
 - iii. the height and massing of developments should be well related to that of their surroundings;*
 - iv. there should be a clear relationship between buildings and spaces and the wider street scene or townscape; and*
 - v. high quality materials appropriate to the local context should be used;*
- d) Take account of any important landscape or topographical features and retain and/or enhance existing landscaping and natural and semi-natural features on site;*
- e) Protect the amenity of the wider environment, neighbouring uses and provide a good standard of amenity for future occupiers of the proposed development;*
- f) Take into account the need to promote public safety and deter crime and disorder through well lit neighbourhoods and development of public spaces that are overlooked;*
- g) Create permeable and legible developments which are easily accessed, throughout the site and connections outside the site, and used by all, regardless of age, mobility and disability;*
- h) Provide highway layouts with well integrated car parking and landscaping which create a high quality public realm and avoid the perception of a car dominated environment. In doing so, proposals will be expected to prioritise safe and convenient pedestrian and cycle movement;*
- i) Include hard and soft landscaping schemes to aid the integration of the development into its surroundings;*
- j) Ensure that the layout and design incorporates adequate provision for the storage and collection of waste and recycling bins in a way which does not detract from the appearance of the development; and*
- k) Utilise measures that support resource efficiency.*

All major residential development proposals will be expected to perform positively when assessed against Building for Life 12 guidelines. Developments should seek to avoid red outcomes unless there are exceptional circumstances. All Building for Life 12 assessed schemes will be reviewed once built out and compared to initial BfL 12 assessments.”

- 3.33 *Policy SCLP7.1: Sustainable Transport* requires that all new development “should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment services and facilities”. Such issues were considered as part of the allocation of the site for residential development and the policy confirms that development will be supported where significant impacts on the highways network are mitigated, all available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken, and the cumulative impact of new development will not create severe impacts on the existing transport network. The policy also notes that a scheme should be well integrated into, protect and enhance existing pedestrian routes and the public rights of way network, as required by part (l) of policy SCLP12.4. The requirement for a Transport Assessment and a Travel Plan is also confirmed.
- 3.34 New residential development is expected to contribute to the provision of open space and recreational facilities to “benefit community health, well-being and green infrastructure” within *Policy SCLP8.2 Open Space*. In parallel, maintenance, restoration and enhancement of the existing green infrastructure network and delivering an environmental net gain are secured by *Policy SCLP10.1: Biodiversity and Geodiversity*. *Policy SCLP10.3: Environmental Quality* notes that all development proposals will be considered in relation to their impact on air quality, land contamination, water quality, light pollution and noise pollution, although not all these issues apply to the application site. A similar approach is taken by *Policy SCLP11.2: Residential Amenity*, which reads:

“When considering the impact of development on residential amenity, the Council will have regard to the following:

- a) Privacy/overlooking;*
- b) Outlook;*
- c) Access to daylight and sunlight;*
- d) Noise and disturbance;*
- e) The resulting physical relationship with other properties;*
- f) Light spillage;*
- g) Air quality and other forms of pollution; and*
- h) Safety and security.*

Development will provide for adequate living conditions for future occupiers and will not cause an unacceptable loss of amenity for existing or future occupiers of development in the vicinity.”

- 3.35 *Policy SCLP9.2: Sustainable Construction* requires that all residential development with more than ten dwellings should achieve higher energy efficiency standards so that they result in a 20% reduction on CO₂ emissions below the Target CO₂ Emission Rate (TER) in the Building Regulations. The optional technical standard for water efficiency at 110 litres per person per day is also applied, together with encouraging the achievement of environmental net gain through the use of locally sourced, reused and recycled materials, on-site energy generation, measures to minimise waste from construction, and maximising daylight and passive solar gain through the orientation of buildings. *Policy SCLP9.5: Flood Risk* confirms that new development should be safe, resilient and should not increase flood risk elsewhere. Furthermore, *Policy SCLP9.6: Sustainable Drainage Systems* requires that sustainable drainage systems be used wherever possible and that they should be integrated into the landscaping scheme and green infrastructure provision of the scheme, contribute to the design quality of the scheme, and deliver water quality and aquatic biodiversity improvements. The policy also states that runoff rates from new development must be restricted to greenfield runoff rates wherever possible, or achieve at least a 30% betterment for previously developed sites. *Policy SCLP9.7: Holistic Water Management* requires that adequate foul water treatment and disposal can be provided to serve the development, as required by part (o) of Policy SCLP12.4, alongside re-iterating the reduction in water usage from Policy SCLP9.2.
- 3.36 The Suffolk Coastal Landscape Character Assessment (2018) and the Settlement Sensitivity Assessment (2018) form part of the evidence base for the local plan and are referenced by *Policy SCLP10.4: Landscape Character* which requires that proposals for development should be informed by and sympathetic to the special qualities and features of the area's landscape character. The policy states that proposals will be required to demonstrate their location, scale, form, design and materials will protect and enhance distinctive landscape elements, visually sensitive skylines, river valleys and significant views, the growing network of green infrastructure and the visual relationship and environment around settlements and their landscape settings. The policy specifically notes that development will not be permitted where it would have a significant adverse impact on the natural beauty and special qualities of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty that cannot be adequately mitigated. It also mentions that proposals should include measures that enable a scheme to be well integrated into the landscape and enhance connectivity to the surrounding green infrastructure and public rights of way network. *Policy SCLP11.3: Historic Environment* provides the same protection for designated and non-designated heritage assets, applying the NPPF and requiring that the potential impact be considered through a heritage impact assessment or an archaeological assessment, with specific protection for listed buildings set out in *Policy SCLP11.4: Listed Buildings* and more general guidance in *Policy SCLP11.6: Non-Designated Heritage Assets* and *Policy SCLP11.7: Archaeology*.

Neighbourhood Plan

- 3.37 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.

4. Description of the Proposed Development

- 4.1 This chapter describes the proposal that is subject to an Environmental Impact Assessment. It includes the description of development and a list of the drawings and reports that make up the application for outline planning permission, as well as confirming the content of the proposed scheme and the likely scale of development.

The proposed scheme

- 4.2 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.
- 4.3 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.”*
- 4.4 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 set out at Appendix 4.3. 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.
- 4.5 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).

Information supporting the application for outline planning permission

4.6 The application for planning permission is supported by the following information:

- (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 1 Contamination Risk Assessment (19 January 2021)
- (s) Transport Assessment (12 February 2021)
- (t) Utility Services Report (27 April 2021)

4.7 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.

Elements of the proposed scheme

4.8 The main elements of the proposed scheme are:

Residential

4.9 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.

- 4.10 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.
- 4.11 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.
- 4.12 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.
- 4.13 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

- 4.14 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. Although details 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

- 4.15 A single point of vehicle access is proposed by the application for outline planning permission, 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.

- 4.16 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.
- 4.17 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

- 4.18 A Flood Risk Assessment and Drainage Statement is submitted in support of the application for outline planning permission, confirming that 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 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.

Appendices

- Appendix 4.1 Location Plan, drawing number GN003-PH2-LP-01 rev. B
- Appendix 4.2 Site Entrance General Arrangement, drawing number 66200838-SWE-ZZ-XX-DR-ZZ-010 P01
- Appendix 4.3 Concept Layout, drawing number GN003-CPT-01

5. Alternatives and Design Evolution

- 5.1 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.

Site location, alternative locations and uses

- 5.2 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, therefore no alternative locations will be considered as part of this statement. 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.
- 5.3 As part of the SA process, the selection of the site as an allocation reflected that it complies well with the local plan's Vision for Suffolk Coastal (page 24), Strategic Priorities (page 25) and Spatial Strategy for Growth (page 29), in particular by focussing development at well-connected locations and in accordance with the Settlement Hierarchy (page 41), maximising opportunities for sustainable travel and delivering new and improved infrastructure in parallel to the strategic-scale development at the adjoining garden neighbourhood. The site is currently undeveloped and in agricultural use, therefore a consequence of development will be an overall significant negative effect on land use, with a negative effect on SA Objective 15, Landscape (reflecting the size of the site, its greenfield location and the proximity of the AONB).
- 5.4 Policy SCLP12.4 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.
- 5.5 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.

Site layout and alternative designs

- 5.6 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.
- 5.7 The design of the proposed development at the reserved matters stage will be an iterative process, informed by the consideration of:
- Suffolk Local Plan Policy SCLP12.4
 - The outline planning permission (DC/21/2170/OUT, not yet approved)
 - Review of technical and policy constraints and opportunities during the design stage
 - Masterplanning or Design Coding secured by the outline planning permission, to be instigated prior to the design stage
 - Assessment findings and mitigation requirements based on the results of the EIA
 - The physical characteristics and topography of the site
 - Public and stakeholder consultation.
- 5.8 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

- 5.9 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

- 5.10 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 will not form part of this statement.

6. General Approach to Environmental Impact Assessment

- 6.1 This statement is prepared under the framework set by the requirements of the EIA Regulations; an overview of the overarching methodology to be used in the EIA is set out in this chapter. Methodologies of the assessments required for each of the technical topic areas are described in the following chapters.
- 6.2 Part 1, Regulation 4 of the EIA Regulations requires that the assessment must identify, describe and assess in an appropriate manner, the direct and indirect significant effects of the proposed development on:
- (a) Population and human health
 - (b) Biodiversity
 - (c) Land, soil, water, air and climate
 - (d) Material assets, cultural heritage and the landscape
 - (e) The interaction between the factors listed in points (a) to (d)
- 6.3 The proposed scheme comprises residential development, therefore the assessment of effects listed above must include the operational effects. In addition, the vulnerability of residential use to major accidents or disasters means that the expected significant effects arising from the vulnerability must also be considered.
- 6.4 Part 5, Regulation 18 requires that this statement must comprise at least:
- (a) A description of the proposed development comprising information on the site, design, size and other relevant features of the development
 - (b) A description of the likely significant effects of the proposed development on the environment
 - (c) A description of any features of the proposed development, or measures envisaged in order to avoid, prevent or reduce, and if possible, offset likely significant adverse effects on the environment
 - (d) A description of reasonable alternatives studied by the developer and an indication of the main reasons for the option taken
 - (e) A non-technical summary of points (a) to (d)
 - (f) Additional information specified in Schedule 4 of the regulations that is relevant to the specific characteristics of the proposed scheme and the environmental features likely to be significantly affected, including:
 - (i) A description of the baseline scenario, including the likely evolution of it if the proposed scheme is not implemented
 - (ii) A description of the factors specified in regulation 4 likely to be significantly affected by the proposed scheme, including population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape

- (iii) A description of the likely significant effects of the development on the environment resulting from:
 - The construction and existence of the development, including, where relevant, demolition works
 - The use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources
 - The emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste
 - The risks to human health, cultural heritage or the environment (for example due to accidents or disasters)
 - The cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources
 - The impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change
 - The technologies and the substances used
 - (g) The description of effects must address the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.
 - (h) A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements. That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.
- 6.5 A description of the methods and evidence base used to identify and assess the significant effects of the proposed scheme is set out in each of chapters 7, 8 and 9. An assessment of the cumulative impacts of the proposed scheme is set out in chapter 10.

Consultation

- 6.6 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 of the Scoping Report is attached at Appendix 6.1.
- 6.7 East Suffolk Council provided a Scoping Opinion on 28 January 2022; a copy is attached 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.

General approach to significance

- 6.8 The purpose of this statement 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.
- 6.9 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 will be categorised throughout as set out in Table 6.1:

Table 6.1: 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

- 6.10 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.
- 6.11 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.

- 6.12 The nature of the impacts and the receptors will vary by topic, therefore the criteria used to predict the significance of effects will be 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.
- 6.13 Mitigation measures will be set out in each of the technical assessment chapters where significant impacts are identified, facilitating the purpose of preventing, reducing or offsetting any likely significant effects at both the construction and operational phases, in accordance with Part 7 to Schedule 4 of the EIA Regulations.
- 6.14 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 “scoped out”

- 6.15 The topics excluded from the scope of this statement, 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
- 6.16 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.

Major accidents or disasters

- 6.17 This statement considers expected significant effects arising from the vulnerability of the residential use to the risk of major accidents or disasters. It is considered that the proposed scheme is most vulnerable to road traffic accidents during the construction stage, therefore the potential effects are addressed in chapter 9.

Cumulative impacts

6.18 Part 5 of Schedule 4 of the EIA Regulations requires within the information for inclusion in environmental statements:

A description of the likely significant effects of the development on the environment resulting from, inter alia:

- (e) *the cumulation of effects with other existing and/or proposed projects taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources.*

6.19 There are two types of cumulative impact that need to be addressed:

- Combined or synergistic impacts, caused by the interaction of a number of impacts of the proposed scheme on a particular receptor, which may collectively cause a more significant impact than individually. This type of impact is also known as an “impact interaction”.
- Additive impact is the effect of the proposed scheme together with other reasonably foreseeable developments to create a greater impact than if the sites were considered separately. This type of impact is also known as an “in-combination effect”.

6.20 Cumulative impacts are considered by chapter 10 of this statement. The scope of the cumulative assessment, including other reasonably foreseeable developments, was agreed by East Suffolk Council in their scoping opinion; Table 6.2 sets out the schemes that were agreed to be included the cumulative assessment. The location of these sites is set out in Appendix 10.3 of the Scoping Report.

Table 6.2: schemes confirmed to be included in the cumulative assessment.

Site location	Description	Local plan policy	Application reference
Laureate Fields, Ferry Road	195 homes	None	DC/13/3069/OUT DC/16/3776/ARM DC/18/1993/FUL
North Felixstowe Garden Neighbourhood	2000 homes, 630-place primary school and early years provision, formal recreation provision, community facilities	SCLP12.3	DC/15/1128/OUT (part-site only) DC/20/1002/ARM (part-site only)
Walton High Street	385 homes	None	DC/16/2778/OUT DC/21/1322/ARM

- 6.21 None of the schemes that are listed in Table 6.2 with an extant planning permission were found to be EIA development.
- 6.22 For the record, within the scheme for the North Felixstowe Garden Neighbourhood, 560 new homes have been granted outline planning permission under reference DC/15/1128/OUT and the reserved matters have been addressed for 255 dwellings through application DC/20/1002/ARM. The balance of circa 1440 new homes is not yet subject to an application for planning permission.

Appendices

Appendix 6.1 Scoping Report, dated 10 September 2021

Appendix 6.2 Scoping Opinion, dated 28 January 2022

7. Landscape and Visual Impact

Introduction

(a) Background

- 7.1 Southern Ecological Solutions (SES) has been instructed by Generator Optima (Ferry Road II) Ltd to prepare a Landscape and Visual Impact Assessment (LVIA) for an outline application for up to 150 houses, together with associated new access road, parking and public open space on land to the north of Conway Close and Swallow Close, Old Felixstowe, Suffolk (the 'Site').
- 7.2 As part of the landscape led approach, a landscape and visual assessment was undertaken at an early stage in the design process to identify the constraints and opportunities of the area and its capacity for residential development.
- 7.3 Due to the relationship with the adjacent Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and the position of the Site being on high land to the south of this designated area, a Landscape and Visual Impact Assessment has been prepared as part of the Environmental Statement to be submitted with the planning application to demonstrate how potential changes to the landscape resource have been addressed and to identify any residual landscape and visual effects. This assessment also addresses the cumulative effects of the development alongside other proposals as identified in the Scoping Report. As subsequently agreed with the Landscape Officer this comprised Laureate Fields and the North Felixstowe Garden Neighbourhood.
- 7.4 The Site was originally allocated for housing in the now superseded Local Plan (Felixstowe Peninsula Area Action Plan, January 2017). The allocation has been carried forward within the Suffolk Coastal Local Plan (Adopted September 2020) as an Area Specific Policy (SCLP12.4 Land north of Conway Close and Swallow Close) together with the comprehensive large-scale mixed-use allocation of the North Felixstowe Garden Neighbourhood (SCLP12.3) to the west.

(b) Site context and study area

- 7.5 The location of the Site and study area are shown on Figure 1. The town of Felixstowe is situated on the east coast, approximately 16.5km to the southeast of the county town of Ipswich and is connected by the A14 trunk road and railway. Lying between the Orwell and Deben estuaries, the settlement is an important seaside town, with the nationally significant Port of Felixstowe to the south. Both the port and its associated industries and tourism are important to the economy of the area.

- 7.6 Old Felixstowe lies to the northeast of the town with the golf course extending along the coast to the mouth of the River Deben at 'Felixstowe Ferry'. A passenger ferry links Old Felixstowe with Bawdsey across the Deben during summer months. The area was strategically important for defence with Martello towers and Languard Fort still important features along the coastline.
- 7.7 The Site (approximately 3.83ha) is located at the northern edge of the town which is defined by Ferry Road / Gulpher Road. Beyond this the land rises slightly to a ridge at Laurel Farm before falling away into the Deben Estuary and Felixstowe Marshes. The urban area is characterised by mid- to late-20th Century residential development (one and two storeys in height) interspersed with late 19th Century housing. Within the countryside to the north of the Site, isolated farmsteads are seen throughout the higher land with Felixstowe Ferry to the northeast at the mouth of the River Deben.
- 7.8 The study area extends 1km from the centre of the site. Land to the south of the Site comprises urban development up to the shore in the east (Character E3 Felixstowe) with land to the north forming the B2 Character Area (Deben Valley).

(c) Approach and methodology

Approach

- 7.9 This LVIA has been carried out as part of an Environmental Statement prepared to accompany the planning application for the proposed development. The process follows the general principles set out in the 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA3) published by the Landscape Institute and IEMA (Guidelines for Landscape and Visual Impact Assessment, Landscape Institute and Institute of Environmental Management, 3rd Edition, 2013).
- 7.10 GLVIA3 states that the role of Landscape and Visual Impact Assessment (LVIA) is "to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource and on people's views and visual amenity."
- 7.11 The definition of landscape as described in the European Landscape Convention (ELC) (European Landscape Convention, Council of Europe, 2002) is "an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors." The scope of the ELC concerns all natural, rural, urban and peri-urban areas and applies to all landscapes everywhere and in any condition whether "outstanding, every day or ordinary."
- 7.12 Landscape is a dynamic, complex system which has evolved through history in response to physical processes and human intervention and will continue to change as a result of both natural and cultural influences. The process of landscape and visual assessment is important to assist in making judgements and decisions alongside managing and guiding future landscape change.

- 7.13 In this context the assessment seeks to identify the ability of the site and its surrounding landscape to accommodate the development, while seeking to avoid, reduce or mitigate any detrimental effects. In accordance with the guidance the effects on landscape character and visual amenity are appraised separately.

(d) Methodology

- 7.14 The existing (baseline) conditions for both the landscape and visual appraisal are as described in Winter 2020/2021, with photography for existing and new viewpoints also captured in Summer 2022. The assessment was informed by a desk-based study of information including OS Maps, Aerial Images and published reports, alongside adopted planning policy. A full list of information is provided in Appendix 7.1.
- 7.15 The full methodology and criteria for the assessment of landscape and visual effects is set out in Appendix 7.2. In accordance with GLVIA3 the approach used is proportional to the scale of the project and the nature of the likely effects; the emphasis being on those that are likely to be significant.
- 7.16 The assessment was undertaken by a Chartered Landscape Architect, experienced in undertaking landscape and visual appraisals and impact assessments. The site visit and landscape / visual survey was completed on 10th December 2020 in cloudy conditions, with a second visit having taken place on the 16th May 2022 in bright and sunny conditions.

(e) Report structure

- 7.17 The report is set out into a number of sections:
- Planning Context - identifies the statutory and non-statutory designations within the study area and the associated planning policy context in relation to landscape and design. This includes the identification of potential areas or features of value which are important considerations in the planning process.
 - Site and Proposed Development - provides a description of the Site and identifies the principal landscape constraints and opportunities that have informed the design of the development. The subsequent description of the development sets out the layout and design of the proposals on which the landscape and visual assessment is based. This includes the identification of primary or embedded mitigation measures which have been incorporated into the design to avoid or reduce potential effects.
 - Landscape Assessment - describes the landscape of the area and assesses the existing contribution of the Site to the locality and its sense of place and how this will change as a result of the development. This includes changes to the individual components (trees, hedges, buildings etc), and the landscape character of the area.
 - Visual Assessment - describes the existing views of the Site from a variety of public viewpoints and how these and the visual amenity experienced by people both living and visiting the area will change.

- Cumulative Effects – assesses the impact upon landscape and visual effects generated by incremental changes caused by other past, present or reasonably foreseeable actions together with the project.
- Mitigation and Monitoring Measures - identifies the additional measures required to ensure that landscape and visual effects are considered as part of the detailed design, construction / implementation and management of the proposed development. Such measures can be agreed as part of the reserved matters and secured by planning conditions where necessary.
- Summary and Conclusions - identifies the residual landscape and visual effects and their relative significance.

(f) Assumptions and liabilities

- 7.18 The assessment of landscape and visual effects is based on the submitted planning application information including the Planning Statement, Design and Access Statement and Concept Layout. The LVIA should be read in conjunction with these planning drawings and documents. It should be noted that layout, scale and appearance are to be subject of a reserved matters planning application and in accordance with the Design and Access Statement submitted with the application, development height will be a maximum of two storeys in line with part (e) of Policy SCLP12.4.
- 7.19 The detailed landscape scheme for the site is to be prepared and agreed post planning as part of the reserved matters. In terms of new vegetation (Year 1) it is envisaged that the size of the plant stock will provide some immediate impact in key areas such as the site boundaries, while predominantly using stock of more modest size to deliver a mature green framework. Specific aspects regarding the detailed design and implementation of proposed planting are considered in this assessment.
- 7.20 The visual survey and baseline photographs were completed in December 2020, with additional summer photos taken for existing as well as new viewpoints taken in May 2022. The winter images represent a time during winter months when there was no vegetation cover showing the worst-case scenario in terms of visibility of the Site.

Viewpoint summary:

- View 01** - (Winter) View looking north from informal footpath off Upperfield Drive between houses to adjacent field
- View 02** - (Winter) View looking north from Footpath 12 between Park Farm and properties adjacent to Upperfield Drive
- View 03** - (Winter) View looking north east across the Site from Footpath 12 towards the junction at Ferry Road/Gulpher Road
- View 04** - (Winter) View looking south east towards the Site from Bridleway 16 where it joins Hyem's Lane
- View 05** - (Winter) View looking east towards the Site from Hyem's Lane (Bridleway 16)
- View 06** - (Winter and Summer) View looking east from further along Hyem's Lane on the junction of PROW 15, 16, 17 and 18

- View 07** - (Summer) View looking east from PROW 17 half way between Hyem's Lane and Gulpher Road View looking south east towards the Site from Footpath 17
- View 08** - (Winter and Summer) View looking south east towards the Site from Footpath 17
- View 09** - (Winter and Summer) View looking south towards the Site from the PROW 5 adjacent to Hill Cottage
- View 10** - (Winter and Summer) View looking south from the PROW 5 from Laurel Farm
- View 11** - (Winter and Summer) View southwest from the junction with Ferry Road/Gulpher Road
- View 12** - (Winter and Summer) View looking south down Ferry Road showing the Site on the right beyond existing vegetation
- View 13** - (Winter and Summer) View looking west along Ferry Road (at the junction with Marsh End) towards the junction where it turns to Gulpher Road
- View 14** - (Summer) View west into the Site from Ransom Road, entrance to Laureate Fields
- View 15** - (Winter and Summer) View looking west across the Site from Footpath 12 to Park Farm and beyond
- View 16** - (Summer) View north from Ferry Road
- View 17** - (Summer) View east from Gulpher Road near The Grove
- View 18** - (Summer) View south from Gulpher Road near The Grove
- View 19** - (Summer) View south-east from Gulpher Road near Gulpher Farm
- View 20** - (Summer) View southwest from Ferry Road at Felixstowe Ferry Golf Course

Planning Context

(a) Scope

- 7.21 The following section identifies the statutory and non-statutory designations within the study area and the associated planning policy context in relation to landscape and design.

(b) Statutory and non-statutory designations

- 7.22 The location of statutory and non-statutory designations is shown on Figure 2. The Site does not lie within any designated or protected areas; the boundary of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and Heritage Coast lies approximately 200m to the east and 500m to the north.

- 7.23 A number of listed buildings exist within Old Felixstowe, predominantly along High Road East with the older scattered farmsteads to the north of the town also being listed in some cases. These include:
- Park Farm cottages (GII)- directly to the north west corner and adjacent to the Site;
 - Laurel Farm (GII)- some 0.3km to the north east of the Site; and
 - Gulpher Hall (GII)- some 0.8km to the north west of the Site.
- 7.24 The Martello tower on the shore, some 1.7km to the north east is both Listed Grade II and is designated a Scheduled Monument.
- 7.25 Other listed buildings mentioned are located throughout the study area but are not physically or visually related to the Site.
- 7.26 The area incorporates a good network of Public Rights of Way (PRoW) connecting the edge of the town with the surrounding countryside and providing recreational routes. Footpath 12 lies within the southern boundary of the Site with PRoW 7, 13 and 5 linking into the Site and its surrounding roads. Views from public rights of way within the proximity of the site are considered in the Visual Assessment section.

(c) National Planning Policy

National Planning Policy Framework

- 7.27 The latest version of the National Planning Policy Framework (NPPF) was published in 2021. The NPPF sets out that the purpose of the planning system is to contribute to achieving sustainable development; this comprises three overarching objectives - social, economic and environmental.
- 7.28 The NPPF establishes the need to build a strong economy by ensuring land is available in the right places to support growth; supporting strong, vibrant, healthy and safe communities; boosting the supply of new homes; achieving well- designed places; and conserving and enhancing the natural, built and historic environment including landscapes and green infrastructure.
- 7.29 The following paragraphs/policies are considered relevant to this assessment:
- 7.30 Chapter 12 states that ‘The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process’ (paragraph 126).

- 7.31 Paragraph 130 advises that planning policies and decisions should ensure that developments:
- a. will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - b. are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - c. are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - d. establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - e. optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - f. create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 7.32 Paragraph 174 states that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.
- 7.33 Paragraph 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
- 7.34 Paragraph 177 mentions that when considering applications for development within Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of: a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

- 7.35 Chapter 16 - 'Conserving and enhancing the historic environment' deals with Heritage Assets describing them as 'an irreplaceable resource' that 'should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.'
- 7.36 Paragraph 194 brings the NPPF in line with statute and case law on listed buildings and conservation areas. It says that: 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'
- 7.37 In relation to heritage assets and townscape, the Government's objective is for Local Authorities to 'identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal' (paragraph 195).
- 7.38 In determining applications, the NPPF (Paragraph 197) states that LPA's should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness.
- 7.39 Paragraph 202 states 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 7.40 Finally, in terms of enhancing the setting of heritage assets the NPPF states that 'local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably (paragraph 206).

(d) District planning policy

- 7.41 The Adopted Planning Policy for this area of East Suffolk comprises the 'Suffolk Coastal Local Plan 2020', Proposals Map and associated Supplementary Planning Documents.
- 7.42 The specific policies relevant to the site within the Suffolk Coastal Local Plan (2020), including relevant supplementary planning documents are set out below.

Suffolk Coastal Local Plan (adopted September 2020)

- 7.43 Within the adopted Local Plan the Site is allocated for housing, with the comprehensive large-scale mixed use allocation of the North Felixstowe Garden Neighbourhood immediately to the west. Refer to Appendix 7.3 for a Policy Map Extract.
- 7.44 The North Felixstowe Garden Neighbourhood encompasses 143ha of land as a 'comprehensive leisure led development' which is expected to deliver leisure and community facilities, employment land, and up to 2,000 dwellings with significant areas of green infrastructure and natural green space. A combined masterplan led approach will be used to inform individual planning applications for parcels of land as they come forward over the local plan period.
- 7.45 The Site has been carried forward from the Felixstowe Peninsula Area Action Plan Development Plan Document (2017) and is allocated separately under Policy SCLP12.4 for approximately 150 dwellings. The supporting text paragraph 12.64 confirms that 'The properties on Conway Close, Swallow Close and Upperfield Drive currently define the edge of the built-up area of Old Felixstowe with countryside to the north. The land can provide a natural extension to the built form of Felixstowe without causing a detrimental impact on the Area of Outstanding Natural Beauty or important views of the Deben Estuary. Understanding the potential impact on the natural beauty and special qualities of this area and identifying appropriate mitigation measures to be delivered on site will be necessary to help conserve and enhance the nationally designated landscape.'
- 7.46 Although the Site is not included within the North Felixstowe Garden Neighbourhood masterplanning structure, due to its physical relationship a similar landscape approach should be adopted, with the area seen in conjunction with and linked to the wider development.
- 7.47 Policy SCLP12.4: Land North of Conway Close and Swallow Close, Felixstowe subsequently states that 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.

7.48 Policy SCLP12.3: North Felixstowe Garden Neighbourhood sets out the planning principles for the adjoining development.

7.49 Paragraph 12.31 of the new Local Plan states that ‘The previous Local Plan (Core Strategy and Felixstowe Peninsula Area Action Plan) sought to ensure that Felixstowe will be further enhanced as a thriving community, coastal resort and port with a mix of employment and housing opportunities attractive to residents of all ages and welcoming to visitors. The North Felixstowe Garden Neighbourhood encompasses 143ha, a comprehensive development of which is expected to deliver a leisure led development, provide up to 2,000 dwellings incorporating dwellings for older and younger people, affordable housing and self-build plots.’

7.50 It also confirms in paragraph 12.36 ‘To the north of Felixstowe, some areas are designated as part of the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and provide an attractive landscape on the edge of the River Deben. To complement the landscape designation, it is essential that the masterplan development proposed for this area includes significant green infrastructure provision and areas of natural green space for recreation. Integrating the provision of appropriate green infrastructure is a fundamental part of the creation of a new Garden Neighbourhood in Felixstowe and will complement the existing areas, the public rights of way and the adjacent countryside.’

7.51 Paragraph 12.38 of the new Plan notes that ‘The Garden Neighbourhood is within close proximity to a number of European protected sites including the Stour and Orwell Estuaries SPA/Ramsar and the Deben Estuary SPA/Ramsar. The Habitats Regulations Assessment has identified that the Garden Neighbourhood requires the provision of “Suitable Alternative Natural Greenspace” (SANG) areas to mitigate any potential impact on the protected sites in the plan area.’

- 7.52 Paragraph 12.51 states that ‘Introducing a comprehensive approach to green infrastructure will allow the biodiversity networks to be enhanced both through natural processes and any management techniques that may be introduced over the plan period.’
- 7.53 As part of the strategy for integration and connectivity within the town paragraph 12.48 notes that ‘Integrating new connections with the existing network of roads and footpaths will provide opportunities to enhance the area and encourage ease of movement for all.’ This includes ‘Opportunities to provide off road cycle paths to increase recreational opportunities and active lifestyles’. Gulpher Road is designated a ‘Quiet Lane’ and should be protected and not used for intensive vehicular access following development.
- 7.54 In terms of the relationship with heritage assets, a Heritage Impact Assessment was undertaken which highlighted a number of Listed Buildings outside, but in close proximity. Important to the current application are Park Farm Cottages directly adjacent to the north west corner of the Site.
- 7.55 Paragraph 12.53 states that ‘Development of the site will need to ensure that any potential harm to the setting of these buildings is mitigated through the retention of open spaces and important views.’
- 7.56 In accordance with the Local Plan the general core policies relevant to landscape which future development management decisions will be assessed also include:
- 7.57 Policy SCLP10.1: Biodiversity and Geodiversity: ‘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’. All development should follow a hierarchy of seeking firstly to avoid impacts, 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. Adherence to the hierarchy should be demonstrated.’ Biodiversity net gains should exceed any losses.
- 7.58 Policy SCLP10.4: Landscape Character states that: ‘Proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018), or successor and updated landscape evidence.

- 7.59 Development proposals will be expected to demonstrate their location, scale, form, design and materials will protect and enhance:
- The special qualities and features of the area;
 - The visual relationship and environment around settlements and their landscape settings;
 - Distinctive landscape elements including but not limited to watercourses, commons, woodland trees, hedgerows and field boundaries, and their function as ecological corridors;
 - Visually sensitive skylines, seascapes, river valleys and significant views towards key landscapes and cultural features; and
 - The growing network of green infrastructure supporting health, wellbeing and social interaction.'
- 7.60 Policy SCLPI I.1: Design Quality: The Council will support 'locally distinctive and high-quality design that clearly demonstrates an understanding of the key features of local character and seeks to enhance these features through innovative and creative means.'
- 7.61 Successful applications will 'Support inclusive design environments which are legible, distinctive, accessible, comfortable, and safe, and adopt the principles of dementia friendly design;'
- 7.62 Proposals should 'Demonstrate a clear understanding of the character of the built, historic and natural environment and use this understanding to complement local character and distinctiveness through robust evidence, informed sources and site-specific context and analysis.' They should also 'Respond to local context and the form of surrounding buildings...' and take account of 'any important landscape or topographical features and retain and/or enhance existing landscaping and natural and semi-natural features on site.' They should 'Protect the amenity of the wider environment,' 'Create permeable and legible developments which are easily accessed,' 'Provide highway layouts with well-integrated car parking and landscaping which create a high quality public realm' and 'Include hard and soft landscaping schemes to aid the integration of the development into its surroundings.'
- 7.63 Policy SCLPI I.3: Historic Environment requires that 'All development proposals which have the potential to impact on heritage assets or their settings should be supported by a Heritage Impact Assessment and/or an Archaeological Assessment prepared by an individual with relevant expertise.'

Site and proposed development

(a) Application site

- 7.64 The Site, approximately 3.83ha, lies to the north of and adjacent to the settlement of Old Felixstowe. The Site comprises a small agricultural field on the western edge of Ferry Road and to the south of Gulpher Road (designated a Quiet Lane).
- 7.65 The application Site is allocated for housing under Local Plan Policy SCLP12.4.

(b) Site description

- 7.66 The principal features of the site and its immediately surrounding area are shown on Figure 3 Site Analysis and are described below.

Landform

- 7.67 The topography of the area comprises a flat to slightly undulating plateau which sits above the marshland to the north associated with the Deben River valley. The Site itself sits at approximately 19m AOD with land falling dramatically to the north some 500m away beyond the ridge which runs from Rue's Farm in the east and towards Gulpher Hall in the west and separates 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 (Rosier and Walton) and low-lying arable land all within the Coastal Levels which follow the 5m AOD contour at this point.
- 7.68 To the east/south east, the land falls away relatively gently to the shoreline with the settlement predominantly sitting between 5 and 20m AOD. A slightly higher plateau sits to the south and south west of the site at 20m+ AOD.

Access

- 7.69 The land is in private ownership. Agricultural access to the Site is via the adjoining land to the west.
- 7.70 A footpath (PRoW 12) runs along the southern boundary of the Site linking the town to PRoWs beyond. The PRoW forms part of a pleasant circular walk which runs along Hyem's Lane towards Gulpher Hall and then follows the high ground to the east before turning back south onto Ferry Road.

Land use and vegetation

- 7.71 The Site comprises a single small rectangular arable field of Agricultural Land Classification Class 2.

- 7.72 The northern boundary of the Site along Gulpher Road is defined by a good quality native hedgerow which continues around the junction and some way down the eastern boundary adjacent to Ferry Road, becoming more gappy to the south. The southern section opposite the established houses in Ferry Road is open with a group of native trees set within a grass verge with a link to PRow 7 to the east.
- 7.73 The southern boundary is formed by the boundary fences of properties on the western side of Ferry Road, Conway Close and Swallow Close, with scattered vegetation in rear gardens. Here the existing settlement edge is abrupt.
- 7.74 The south western boundary with adjoining agricultural land (forming part of the Felixstowe Garden Neighbourhood) is currently open. To the north is the curtilage of Park Farm Cottages; the area around the building and barns is open with the remainder to the north enclosed by trees.

Built form

- 7.75 There are no buildings on Site.
- 7.76 Directly to the north west and adjacent to the Site sits Park Farm Cottages and a series of agricultural buildings associated with the farmstead. Park Farm Cottages are Grade II Listed. To the north along Gulpher Road and Ferry Road are clusters of cottages set back from the road behind front gardens.
- 7.77 The other buildings surrounding the Site comprise predominantly mid- to late-20th century development along which has expanded from Ferry Road and out from High Road East (where the majority of Listed Buildings exist).
- 7.78 A mix of single and two storey dwellings are set out as estates which form the northern boundary of the settlement of Old Felixstowe. A school and more commercial areas lie to the south of the Site, whilst coastal development lies to the east some distance away.
- 7.79 A new development known as 'Laureate Fields' is under construction to the east of Ferry Road. The scheme comprises 197 houses and apartments with associated public open space. The dwellings which are contemporary in style are generally two storeys in height (with occasional three storey blocks) and can be seen in part from coastal views.
- 7.80 To the north of the Site more isolated farmsteads exist, some of which have large scale, modern agricultural structures which sit high on the landscape.

Other features

- 7.81 Approximately 1.7km to the north east of the Site sits a Martello tower which is both listed and a scheduled monument. This does not have any physical or visual influence on the Site.

Development proposals

- 7.82 The proposal is an outline application for up to 150 dwellings with associated new access road, parking and landscaping including a large area of public open space with associated SuDS. Access to the site will be from Ferry Road. The Concept Layout is shown in Figure 4.

(a) Description

Access

- 7.83 The access to the development will be from Ferry Road to the east of the Site. To facilitate the construction of the access and footway and the required visibility splays sections of the existing hedgerow will need to be removed. This will be kept to the minimum necessary with vegetation removed being replaced as part of the landscape scheme.

Layout

- 7.84 The Concept Layout shows the principles of the proposed development for up to 150 new homes. The details, in terms of layout, scale and appearance are to be agreed by a Reserved Matters application. The access on to Ferry Road is envisaged to link to a central main street with a permeable network of shared surfaces and private drives to the north and south.
- 7.85 Proposed dwellings are set back into the site fronting onto Gulpher Road and Ferry Road, to retain the existing boundary landscape and provide space for new planting (see Landscape Strategy below). Other dwellings are likely to have varying set backs from the internal roads providing gardens of varying depth with space for shrub / hedge planting and trees to soften and enhance the street scene.
- 7.86 To accommodate the proposed SuDS (at the lowest point in the site), the main area of public open space will be located to the north eastern corner on the junction of Ferry Road and Gulpher Road. The open space will provide a break in the settlement edge providing space for strategic tree planting to buffer and green the buildings from the AONB to the north and east.

Built form

- 7.87 The proposed buildings will comprise a mix of detached, semi-detached and terraced dwellings up to two storeys in height. Detached buildings will generally be located to the northern and eastern boundaries to provide a lower density development edge.
- 7.88 The design of the proposed buildings will be informed by an assessment of the local area and are likely to be based on traditional local building forms and detailing such as brick, render and weatherboard. Full details will be provided at the Reserved Matters stage.

Landscape strategy

- 7.89 The Site's edge of settlement location and relationship to the AONB means that the approach to the design and layout of the development should be landscape led. As an allocated site, the scheme provides an opportunity to establish a well-designed settlement edge and improve the existing abrupt transition between the town and surrounding countryside and enable the integration of both existing and proposed development in views particularly from the north.
- 7.90 Existing vegetation to the boundaries of the site (although limited in its extent) should be retained wherever possible and enhanced to provide a framework into which the new development will sit. The most important in this respect is the northern boundary which should be retained and reinforced with native strategic tree planting.
- 7.91 The open space will provide a break in the settlement edge, allowing for considerable 'greening' of this section of the northern boundary in proximity to the AONB and providing a focal point in views along Ferry Road. It is proposed that the design of the open space is multi-functional providing a valuable recreational / amenity space, strategic planting, biodiversity and sustainable drainage. The proposed SuDS should be sympathetically designed to provide a landscape and ecological feature.
- 7.92 Along the western edge of the Site, which is predominantly open, the boundary should be planted with a strong native hedge and trees providing a buffer to Park Farm and the wider landscape to the west. In the longer-term this planting could be integrated as a green corridor between the Site and North Felixstowe Garden Neighbourhood.
- 7.93 The existing PRow (12) to the southern boundary of the Site to the rear of Conway Close and Swallow Close will be retained and enhanced as an important pedestrian route linking established and new neighbourhoods and maintaining connection with the surrounding countryside to the west.
- 7.94 Within the Site, additional strategic tree and shrub planting will help to soften the hard elements of the scheme and will provide additional ecological benefits on a Site which is currently of limited ecological value.

Landscape assessment

(a) Scope

- 7.95 This section describes the existing character of the landscape and assesses the contribution of the Site to the area.
- 7.96 The landscape effects of the proposed development on the landscape as a resource are subsequently identified and described. This includes:
- Changes to the landscape components within the Site - topography, land cover, land use, vegetation, settlement and buildings; and
 - Changes to the character of the landscape and its key characteristics, including aesthetic and perceptual aspects.
 - Changes to the natural beauty and special qualities of the Suffolk Coast and Heaths AONB.

(b) Landscape baseline

The 2018-2023 Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Management Plan

- 7.97 The Suffolk Coast & Heaths AONB covers an area of around 155 square miles (403 square kilometres) stretching from Kessingland, near Lowestoft, in the north, to the River Stour in the south. The eastern boundary is formed by the North Sea and the western boundary encompasses Suffolk's estuaries.
- 7.98 The character of the AONB is a product of the underlying geology and its associated natural habitats. It is shaped by the effects of the sea and the interaction with people on the landscape. It is a gently rolling landscape, with the estuaries a common and dominant feature. Where the land does rise, commanding views across the landscape are rewarding.
- 7.99 Farmland dominates much of the AONB, interspersed with picturesque villages and the occasional small seaside town. There are forestry plantations, low lying freshwater marshes and extensive tracts of heathland.
- 7.100 The coastal fringe is dominated by estuaries, grazing marshes and lowland heath. This part of Suffolk is promoted as the 'Energy Coast' by the local authorities, reflecting the nuclear power complex at Sizewell and offshore wind farms and the associated infrastructure. Where the AONB joins the sea, shingle beaches often stretch for many miles. Orford Ness, the great shingle spit between Southwold and Shingle Street, is the largest of its kind in Europe. In some places, soft cliffs rise behind the beach, demonstrating the changing and dynamic nature of the coast in this part of England.

- 7.101 A dominant feature of the coast is the five river estuaries. The Blyth, Alde and Ore, Deben, Orwell and Stour estuaries are the locations of some of England's finest wildlife habitats, intertidal areas of mudflats and saltmarsh. In some places the mouths of rivers have been blocked creating large areas of brackish or freshwater marshland.
- 7.102 Along many of the estuaries there are centuries-old river walls to claim or protect farmland from the sea. There are areas of extensive reedbeds such as at Westwood, the UK's largest reedbed, this is a significant landscape feature and wildlife habitat. Much of the area was once heathland, known as the Sandlings.
- 7.103 Although significant tracts remain, much of the heathland has been fragmented, converted to farmland, planted for coniferous woodland, or developed for housing or military use.
- 7.104 In 2018 the Suffolk Coast & Heaths AONB remains a lightly populated area that is dominated by agriculture. In undeveloped areas on the coastal fringe, conservation organisations have significant land assets that are nationally and internationally important. The quality of the environment is a major pull for visitors and residents. There is considerable cultural interest, with many parts of the AONB famed for its association with artists and musicians.
- 7.105 The relevant Suffolk Coasts and Heaths AONB Natural Beauty and Special Qualities Indicators which have been considered in this assessment include the landscape quality, the scenic quality, the relative wildness and relative tranquillity and natural heritage features.

Published Landscape Character Assessments

- 7.106 The published landscape character areas (LCAs) and landscape character types (LCTs) are shown on Figure 5. The principal published documents include NE491: National Character Area (NCA) Profile: 82 Suffolk Coast and Heaths, Natural England, July 2013; the Suffolk Landscape Character Assessment, Suffolk County Council (<https://suffolklandscape.org.uk/>); and the Suffolk Coastal Landscape Character Assessment, Alison Farmer Associates, 2018.
- 7.107 Relevant information, including landscape character descriptions and management guidelines within the Landscape Character Guidelines for the Suffolk Coast and Heaths Area of Outstanding Natural Beauty and Touching the Tide Landscape Character Assessment, Final Report, 2012 have also been taken into account.

National

- 7.108 The National Landscape Character Map of England identifies broad areas of landscape character. The study area lies within National Character Area (NCA) 82: Suffolk Coasts and Heaths.

7.109 The description and key characteristics of the area provide a broad landscape context. Those aspects relevant to the study area are highlighted in bold:

- **A predominantly low-lying landscape with some areas along the coastal plain below or at sea level. Changes in relief are slight, but enough to distinguish the Sandlings, sandy rolling ‘upland’ between estuaries.**
- Crag deposits covered by deep, free-draining sands, gravels and till, forming light, sandy, easily worked soils on the Sandlings, giving rise to characteristic variation in land cover.
- **A dynamic coast, shaped by long, sweeping bays, cut by the series of more sheltered estuaries. The shoreline is defined by shingle beaches and structures, sea defence features and in places low, soft crumbling cliffs.**
- **Rivers flow west - east forming intimate, twisting alluvial valleys. Estuaries support internationally important salt marshes and intertidal flats with large numbers of waders and wildfowl, while their open waters are busy with pleasure and commercial craft.**
- Expansive coastal level grazing marshes divided by drainage dykes contain internationally important reedbeds and fens. Many are managed as nature reserves owing to their rich biodiversity, which includes a nationally important concentration of breeding bittern.
- Fragments of internationally important lowland heathland support nightjar, woodlark, adder and silver-studded blue butterfly. **Views across the dry farmland and heathlands are open and extensive, except where enclosed by woodland.**
- Farm woodlands, plantations and field boundary trees provide a treed character with substantial coniferous forests (Rendlesham, Tunstall and Dunwich) in the core of the NCA. **Ancient broadleaved woodland and parkland wood pasture cloak the southern river valley and estuary slopes. The coastal levels are largely devoid of trees.**
- Bracken, heather and birch on Westleton Heath, a fragment of the once extensive lowland heathland resource.
- High-quality vegetable production and outdoor pig units are distinctive agricultural land uses. Beef cattle graze the coastal levels although drainage has led to the conversion of many of the grazing marshes to arable production.
- Inland valleys contain small-scale historic patterns of irregular drained meadow enclosure, bounded by elm hedgerows. **The Sandlings and the coastal plain show 18th- to mid-19th-century large-scale regular enclosure.**
- **Pine lines and shelterbelts are characteristic of the Sandlings.**
- A rich archaeology includes Saxon burial mounds, medieval rabbit warrens and numerous country house estates. The coast supports Napoleonic Martello towers, Second World War pillboxes and the Orford Ness Cold War testing area with its distinctive ‘pagodas’. Settlement is sparse, with small, isolated villages and farmsteads. Larger urban settlements are confined to the north and south (Lowestoft, Ipswich and Harwich). Distinctive coastal towns (Aldeburgh, Southwold and Felixstowe) enjoy a relatively unspoilt atmosphere.

- Traditional buildings utilise soft-hued red bricks with straw thatch, pantiles or peg tiles. Some are rendered and painted (often in ‘Suffolk Pink’) while others (including churches) use locally occurring split or knapped flint.
- Brightly painted beach huts line the coastal resort seafronts.
- Large commercial ports (Harwich and Felixstowe), Sizewell nuclear power station, the Cobra Mist transmitting station and the Orwell Bridge all contribute landmark diversity. Major transport infrastructure includes the A14 and A12 and the main East Coast rail line.
- **Public access is extensive both on the land and on the rivers. The sense of tranquillity and wildness is integral to the distinctiveness of the NCA.**
- Inspiring many writers, artists and naturalists, and supports the area’s popularity as a recreation and tourist destination.

7.110 One statement of Environmental Opportunity which relates to the Site is: ‘Encourage measures which lead to the enhancement of existing settlements and the design and location of new developments and infrastructure. Provide wider associated social and cultural benefits through the provision of high-quality green infrastructure networks.’

7.111 Further information is provided in the Suffolk Landscape Character Assessment. The Site and surrounding landscape to the north of Felixstowe lies within the ‘Rolling Estate Sandlands’ Landscape Type, with the ‘Coastal Levels’, ‘Coastal Dunes and Shingle Ridges’ and ‘Nearshore Waters’ Landscape Type along the lower lying coast to the north and east. The existing settlement of Felixstowe to the south is classified as ‘Urban.’

7.112 The site is located within the Rolling Estate Sandlands character area, on the edge of the existing urban area. The key character area characteristics are:

- Rolling river terraces and coastal slopes;
- Sandy and free draining soils with areas of heathland;
- Late enclosure with a pattern of tree belts and straight hedges;
- Landscape parklands;
- A focus of settlement in the Estate Sandlands landscape;
- 19thC red brick buildings with black glazed pantiles in the east;
- Lark valley buildings are frequently of brick or flint with tiled or slate roofs;
- Tree belts and plantations throughout;
- Occasional and significant semi-natural woodlands and ribbons of wet woodland;
- Complex and intimate landscape on valley sides.

- 7.113 In terms of landscape sensitivity and change it is highlighted that this landscape type is and continues to be a focus for settlement, especially in the coastal areas of Suffolk. The area is comprehensively settled, and while the core of villages are generally on the valley sides, settlement change and enlargement means that many encroach onto the surrounding plateau landscape. Much of the coastal area is included within the Suffolk Coast and Heaths AONB which includes sensitive and designated estuary sites and the spatial relationship of this landscape to the adjacent valley floor and coastal landscape types ‘means that change and development can have an extensive visual impact.’
- 7.114 As such the guidance notes identify that Landscape and Visual Impact Assessment is important to ‘identify the risks and options for mitigation.’ This may include planting commensurate with the scale of the development and its capacity to absorb development without effecting landscape character.
- 7.115 The Coastal Levels occurs along the flat low-lying fringes and marshes of the river estuaries such as the Deben to the north of Felixstowe. The key characteristics are:
- Flat marshland adjacent to the coast or estuaries;
 - Marine alluvium soils;
 - Sinuous and complex mediaeval dyke networks;
 - Uniform 19th century dyke networks;
 - Cattle-grazed wet grassland;
 - Widespread modification for arable production;
 - Small plantations and carr woodlands;
 - Inland side of rising ground often wooded;
 - Important wildlife conservation areas;
 - Unsettled landscape with domestic buildings on the fringes; and
 - Derelict wind pumps.
- 7.116 In terms of landscape sensitivity and change it is highlighted that the extensive, flat and open landscape with long views is highly sensitive. This includes development on the adjacent slopes which ‘can have a profound effect on the setting of, and views from this landscape.’ The area is identified as a ‘key characteristic of the Suffolk Coast and Heaths AONB, which in combination with the landscape types around it, contributes to the special character of the AONB.’ It is therefore important that development does not have an adverse effect on the setting of the area.

District

- 7.117 As per the Suffolk Coastal Landscape Character Assessment, Alison Farmer Associates, 2018 the study area encompasses two Landscape Character Types and Areas; the study area lies on southern edge of J5, adjacent to the urban area E3.
- E. Resorts- E3. Felixstowe; and
 - J. Estuaries- J5. Deben Estuary

- 7.118 E3. Felixstowe comprises the urban area as well as the coastal dune and shingle ridges along the coast. It is described as:

'Felixstowe functions as both an Edwardian seaside resort and the UK's most important port - the largest container port in the country. It is a popular resort offering a sand and shingle beach, rows of colourful beach huts, and the usual range of sea side town amusements and attractions along its long promenade. Walton was the site of the original Roman settlement of Felixstowe located on the higher land above the Deben Estuary. Despite the enlargement of Felixstowe to the point that Walton is largely subsumed within the town, there is still a distinct character associated with Walton. Felixstowe, mixes a busy urban character with the feel of the open sea.'

- 7.119 Identified special qualities and features within the area include Languard Fort and Languard Common (to the south of the town); the Felixstowe Conservation Area along the seafront; the port of Felixstowe; archaeological evidence of early settlement; and the point at Old Felixstowe which has a 'distinctive and historic feel.' None of the strategy objectives are relevant to the Site.

- 7.120 J5. Deben Estuary covers the lower half of the Deben from Wilford Bridge to the mouth of the river at Bawdesy / Old Felixstowe. The area encompasses a variety of landscape types from the Suffolk Landscape Character Assessment (see above). It is described as:

'The character area comprises a complex mix of landscape types across the valley sides and bottom of the Deben Estuary, parts of which have a particularly empty, unspoilt and tranquil feel. The range and strength of the tide makes for a dynamic tidal landscape of constant flux. the meandering river channel is lined with saltmarsh and intertidal mud flats.... and the intertidal zone is flanked by an expansive area of Coastal Levels. The levels are remote, flat, drained marshlands predominantly under arable cultivation, with some pasture and are part of the important mosaic of habitats. Together with the open fields which sweep down the valley slopes they create an open and expansive landscape. giving rise to a real sense of remoteness.

The landscape type on the valley sides is rolling estate sandlands.... there is an estate feel to the landscape, with large estates maintaining woodlands and managing farmland. fields are divided by hedges of hawthorn with hedgerow oaks or pine shelterbelts.

The area has a long history of settlement.... Woodbridge sits at the head of the estuary... away from the town settlement is found in occasional dispersed, linear villages on the valley sides. the villages are not prominent in views of the estuary, as they are set back from the river farmsteads dot the valley sides at intervals.'

- 7.121 Limited reference is made to the town of Felixstowe which immediately adjoins the southern side of the valley and its influence on the area. It is however noted that the cottages at Felixstowe Ferry are part of the scene in views towards the mouth of the river.

- 7.122 The identified special qualities and features within the area are focussed on the ‘very distinctive scenic estuary landscape with a strong sense of place.’ The estuary is protected by a number of national and European designations for its breeding and wintering birds and is valued for recreation on and alongside the river playing a key role in tourism in this part of Suffolk.
- 7.123 Strategy objectives aim to protect the unique and distinctive landscape, natural habitats, and heritage of the Deben Estuary. To protect the strong sense of tranquillity it is important that development within and beyond the area does not have a significant visual impact or affect the perceptions of the area.
- 7.124 The Settlement Sensitivity Assessment (Settlement Sensitivity Assessment Volume 2: Suffolk Coastal, Alison Farmer Associates, 2018) provides a robust analysis of the settlement fringes to development and change to inform the preparation of local plan policies and land use allocations; inform the submission and determination of planning applications; and identify priorities for the enhancement, protection, management, and conservation of landscape areas.
- 7.125 Due to the landscape constraints, the assessment of Felixstowe considers only one peripheral area to north of the town which is identified as FE1. The area extends from the settlement edge north to the River Deben. At the time the assessment, the Site was already allocated for Housing and along with the land to the east of Ferry Road forms part of the defined built-up area boundary. Aspects however remain relevant to the planning application.
- 7.126 The sensitivity of the northern fringes of Felixstowe are described below. Peripheral Area: FE1 (Settlement Sensitivity Assessment extract, 2018):

‘This area comprises the plateau farmland and valley slopes to the Deben Estuary north of the town between the junction of the A14 and Port of Felixstowe Road and the coast. The sensitivity of this tract lies in its sloping topography away from the settlement edge and its inter-visibility with the Deben Estuary/partial inclusion in the Suffolk Coast and Heaths AONB. Its sensitivity is further increased by its historic rural character, especially along Gulpher Road. Its value is associated with its role as a landscape setting to the town, providing open space and recreation close to where people live and in achieving a perceived gap between Felixstowe and Trimley St Mary.’

The flatter elevated areas of land above the 20m contour and adjacent to the existing urban edge west of The Grove woodland are less sensitive to development. Some limited residential development could be accommodated between the existing linear urban edge and Hyem's Lane although care would be needed to ensure a vegetated and indented urban edge. Building heights would also need to be kept low to ensure no visual intrusion into wider countryside and the Deben Estuary. Where the topography is more varied and associated with small streams it is sensitive to development due to higher scenic value and potential to offer green corridors from the urban edge to the wider landscape. Land around the junction of Candlet Road and A14 is sensitive to development which appears visually prominent on this higher land and is likely to further undermine perceptions of separation between Felixstowe and Trimley St Mary.

The rural character of the northern fringes of this landscape are important to retain. They offer potential for improved access and countryside recreation between the urban edge and AONB boundary ensuring an appropriate landscape buffer to the AONB and potentially relieving pressure/risk of disturbance of internationally important wetland habitats.

Physical Character

Rolling Estate Sandlands landscape type comprising elevated relatively flat land adjacent to the urban edge at c. 20m AOD which then dips into the Deben Estuary dropping to around c. 5m AOD. The central section of this area is dissected by a small stream/tributary to Kings Fleet giving rise to greater topographic variation.

Landscape Patterns/Condition

Relatively open, expansive character on the flatter plateau. Arable landuse predominates within well-trimmed hedgerows. There are wider views north and east to the coast and into the Deben Estuary on upper slopes. Smaller scale more intimate character in tributary stream valley and along Gulpher Road including small scale pastures, hedgerow oaks and rural cottages/historic farm buildings.

Existing Settlement Edge

Existing urban edge to the east is visible from Hayem's Lane and Gulpher Road. Housing appears linear and abrupt although screened in places with some properties single storey. Some areas of land adjacent to urban edge used for recreational purposes. Strong line of vegetation along Candlet Road screens views to the urban edge. Housing allocation/permissions to the south of Candlet Road and east of Port of Felixstowe Road will bring development up to the edge of major infrastructure routes. Planning permission for mixed development in the vicinity of Cowpasture Farm will extend the built edge of the town into the stream valley landscape.

Views and Visibility

Visually prominent land on the edge of the Deben Estuary with views into the Deben landscape and across as far as Bawdsey. Current urban edge is set back from break in slope. Night time light impacts on AONB. Gulpher Lane sits in folds of topography with limited views to the estuary or existing urban edge.

Cultural and Natural Heritage

Valued woodland at The Grove and associated with the tributary stream valley. Includes recent additional planting. Pre 18th enclosure pattern to the south and east of Gulpher Road while later enclosure further west north of Candlet Road. Rim of the estuary has historic pattern of small farmsteads along rural winding lanes.

Perceptual qualities

Transitional landscape forming a sense of separation between the town and the wider Deben Estuary Valley slopes form the context and define the rural character of the Deben Estuary, the upper slopes forming an important skyline.

Function

Recreational land uses including sports pitches, strategic cycle routes, allotments and horse paddocks. Vegetated character at Docks Spur Roundabout and Candlet Road reinforces perceived sense of separation between Trimley St Mary and Felixstowe.

Opportunities

Identified in the Haven Gateway Green Grid as a strategic green corridor north of the town. There are opportunities to enhance the role of this land in forming a landscape setting to the town and buffer between it and the wider AONB perhaps through the creation of a country park.'

- 7.127 Landscape Character Guidelines for the Suffolk Coast and Heaths Area of Outstanding Natural Beauty identify the study area as falling within the Estuary Valley Sides. This area is distinguished by its long sweeping slopes which create a backdrop to the estuaries themselves and include a large-scale mosaic of different land uses and characterised with quite a strong pattern of field boundaries with hedgerows and hedgerow trees interspersed with farmsteads, small villages or hamlets. The guidelines recommend ensuring that development is not visually intrusive and key features such as hedgerows and woodlands should be retained and managed.
- 7.128 The Touching the Tide Landscape Character Assessment, Final Report, 2012 states that the study area is defined by the River Deben and its valley sides, comprising rolling estate sandlands, with a gently rising topography, often well wooded, and incorporating views across the estuary.

(c) Landscape sensitivity

- 7.129 The purpose of the baseline assessment is to identify and record the existing character and condition of the landscape and the elements, features and aesthetic and perceptual factors that contribute to it. This was completed by a desk study of published Landscape Character Assessments (from national to district level) supported and refined by field work.
- 7.130 An assessment of the local landscape context was undertaken to identify how representative the locality of the Site is of the local landscape character type or area of which it forms part and identify potential landscape receptors.
- 7.131 The value attached to these receptors also needs to be assessed and considered. The assessment of receptor sensitivity (Table 7.1) combines judgements on the susceptibility of the receptor to the specific type of development proposed and the value attributed to that receptor.

Table 7.1: Sensitivity of landscape receptors

Landscape Receptor	Value	Susceptibility	Description	Sensitivity
SITE	MEDIUM	MEDIUM	<p>The Site comprises a small arable field of good quality agricultural land inset on the edge of the built up settlement of Old Felixstowe. There is a good hedgerow boundary to the north and north east adjacent to Gulpher Road (designated as a quiet lane) and Ferry Road. The arable field sits on land slightly lower than the ridgeline to the north, screening the Site somewhat from its surroundings. Urban influences are evident on the southern boundary with harsh boundary fencing with little vegetation to soften the settlement edge and recent housing development to the east. The land to the west forms part of the proposed North Felixstowe Garden Neighbourhood. A number of good quality trees exist on the eastern boundary adjacent to Ferry Road whilst the remainder of the Site (in particular to the west) the land is open.</p> <p>Park Farm Cottages sit adjacent to the Site to the north west corner. Grade II Listed, this feature requires consideration. A public right of way follows the existing urban edge to the south of the site. Careful design and an increase in strategic tree and hedge planting will provide positive benefits to the Site with potential to enhance the character.</p>	MEDIUM

Landscape Receptor	Value	Susceptibility	Description	Sensitivity
LCA E3. FELIXSTOWE	MEDIUM	LOW	<p>Landscape Character Area E3. Felixstowe is a coastal town and seaside resort with a nationally important port to the south. The Site sits on the boundary between this LCA and J5. Deben Valley. Characteristics of the town encompass mid-late 20th Century development with some more historic development occurring along main roads. The existing settlement edge is defined by agricultural land comprising arable and pasture with varied levels of tree cover dependent upon the topography, with increased cover on the lower land focussed around winding lanes and farmsteads. The Grove woodland provides good tree cover and local visual and recreational amenity. The Site is relatively consistent with the characteristics of the area with opportunities to enhance the existing harsh urban edge. There is a promoted strategic cycle route along Gulpher Road. The Grove, to the west of the Site is identified within the Haven Gateway GIS as a key existing ANG (Accessible Natural Greenspace). There are a number of Listed Buildings locally but only one influenced by the Site.</p> <p>The varied settlement allows for integration of potential new development which is able to retain and enhance the character of the town. The scheme has been designed to respond to the settlement character and local context. This includes embedded mitigation including the retention and management of the established mature trees and hedgerows and the strengthening of the landscape structure, particularly along the site boundaries. Considering the above the overall susceptibility to the proposed development is assessed as low.</p>	LOW
J5. DEBEN VALLEY	HIGH	LOW	<p>Landscape Character Area J5. Deben Valley is of high value, being largely designated as an AONB (Suffolk Coast and Heaths) and is internationally important as a wetland habitat (Ramsar / Special Protection Area). It also contains the Suffolk Coast and Heaths Path PRoV. Although the AONB boundary is close to the Site, the influence of development at this point is already felt with the existing hard edge to the settlement boundary.</p> <p>The Site sits on a flat elevated area on the edge of the existing settlement and is set back from the break in the valley slope; the ridge to the north and properties along Gulpher Road act as a</p>	MEDIUM

Landscape Receptor	Value	Susceptibility	Description	Sensitivity
			<p>buffer between the site and the higher value landscape of the Deben Valley and as such is largely detached from it. Nevertheless, the area along Gulpher Road is rural in character and provides the immediate landscape setting to the town.</p> <p>Taking into account the existing local character and potential mitigation, the overall susceptibility to the proposed development is assessed as low. A strategic landscape scheme has the potential to soften the impact of the existing harsh settlement edge.</p>	
<p>The Natural Beauty and Special Qualities of the Suffolk Coast & Heaths AONB : Landscape quality, Scenic quality, Relative wildness, relative tranquility, natural heritage features</p>	HIGH	LOW	<p>An Area of Outstanding Natural Beauty (AONB) is an area that is recognised by the United Kingdom government as having national importance. This importance is reflected in its designation under the National Parks and Access to the Countryside Act (1949).</p> <p>The proposed development won't directly affect landscape elements within AONB's Natural Beauty and Special Qualities, such as topography, land cover, land use, vegetation, settlement and buildings; but it's rather the changes to the surrounding character of the landscape and its key characteristics, including aesthetic and perceptual aspects which could be affected (i.e. the setting).</p> <p>Those elements of the AONB that will be affected by the proposed development are not representative of the AONB as a whole due to the weak relationship with the sea/estuaries and the influence of development in Felixstowe which is a local detractor from tranquillity.</p> <p>Although the AONB boundary is close to the Site, the influence of development at this point is already felt with the existing hard edge to the settlement boundary. The Site sits on a flat elevated area on the edge of the existing settlement and is set back from the break in the valley slope; the ridge to the north and properties along Gulpher Road act as a buffer between the site and the AONB and as such is largely detached from the area which contributes to the AONB's Natural Beauty and Special Qualities.</p> <p>A strategic landscape scheme has the potential to soften the impact of the existing harsh settlement edge. Taking into account the existing local</p>	MEDIUM

Landscape Receptor	Value	Susceptibility	Description	Sensitivity
			character and potential mitigation, the overall susceptibility to the proposed development is assessed as low.	
Refer to Appendix 7.2: Tables A1 - A3 for assessment criteria				

- 7.132 It is also considered important to assess the effects of the Proposed Scheme on identified townscape receptors with reference to their sensitivity to change, magnitude of impact and the resulting effect.
- 7.133 Whilst the assessment of value is partly based on the Planning Policy importance of the townscape, other criteria used to assess townscape value in more detail, including that of undesignated townscape, are set out in Table 7.2 below. The criteria are taken from the Planning Practice Guidance which supports the National Planning Policy Framework (NPPF).
- 7.134 An overall assessment of sensitivity has been made for each townscape receptor based on an overview of the assessments made in relation to value and susceptibility.

Table 7.2: Sensitivity of townscape receptors

Attribute	Value	Susceptibility	Description	Sensitivity
Edge of town	HIGH	LOW	Edge of town consists of well-defined urban edge consisting mainly of rear gardens with presence of advancing urban elements onto the surrounding countryside and agricultural fields.	MEDIUM
Topography, building heights	MEDIUM	LOW	Existing building height near the site predominantly 2 storeys.	LOW
Movement and linkages	MEDIUM	MEDIUM	Presence of several cul de sacs as well as spine roads.	MEDIUM
Land use	MEDIUM	LOW	The existing land use is agricultural, surrounded by mostly residential uses.	LOW
Distinctive character	HIGH	MEDIUM	The existing local pattern of street blocks and plots; building forms; details and materials; style and vernacular is not particularly distinctive.	HIGH
Attractive spaces	HIGH	MEDIUM	Streetscapes, and existing edge of town creates moderately attractive spaces characteristic of low density, edge of town.	HIGH

(d) Landscape effects

Magnitude of landscape change

7.135 Landscape effects may arise from the following:

- Changes in and/or partial to complete loss of landscape elements or features that contribute to the character and distinctiveness of the area;
- The addition of new elements or features (natural and built) that will influence the character and distinctiveness of the landscape; and
- The combined effects of these changes on the overall character of the area.

7.136 The impacts and subsequent landscape effects arising from the proposed development included embedded mitigation are described in Table 7.3. All of the effects at Year 15 are considered to be permanent.

Table 7.3: Magnitude and scale of landscape effects

Landscape Receptor	Sensitivity	Description	Magnitude, Nature of Change	Significance
SITE	MEDIUM	<p>YEAR 1</p> <p>The development will result in a permanent change in the nature and character of the site. At Year 1, the arable field will be replaced with residential dwellings with associated infrastructure including access road, streets, parking, gardens and soft landscape. Although the details are reserved for later consideration, the concept layout demonstrates the principles of the development and associated landscape with buildings up to two storeys in height.</p> <p>In terms of existing landscape elements, in accordance with landscape guidelines the majority of existing vegetation around the boundaries of the site there will be retained and enhanced. Limited removal of trees and hedgerows for the site access on to Ferry Road will have a temporary negative but localised effect. This will be mitigated in the short- to medium-term by the establishment of new landscaping including native hedgerows and trees around the Site boundary as well as the provision of Public Open Space.</p> <p>The landscape strategy encompasses new tree and hedge planting to reinforce the strategic framework into which the development will sit. This includes new planting along the boundary with Park Farm to provide a green buffer to the adjacent listed building. Additional tree planting throughout the development will further soften the built form. At Year 1 all new planting will be immature with limited impact.</p> <p>The Public Open Space will provide a valuable amenity for informal recreation and community use. The incorporation of sympathetically designed SuDS feature will significantly enhance the biodiversity of this area and new native planting will add to the ecological interest and create long term ecological networks across and around the Site.</p>	Medium Adverse	MODERATE
		<p>YEAR 15</p> <p>Subject to detailed design, the layout, built form (height, scale, massing, building style and materials) and landscaping will complement the surrounding settlement. The magnitude and</p>	Low Adverse	MINOR

Landscape Receptor	Sensitivity	Description	Magnitude, Nature of Change	Significance
		<p>nature of the effects will therefore change over time as strategic vegetation (including native hedgerows and trees, street trees and other planting) matures.</p> <p>Whilst still a noticeable and apparent change at the site level, the development would not be uncharacteristic within the surrounding context. With an appropriate detailed landscape scheme the site provides the opportunity to locally increase vegetation cover and establish a softer settlement edge integrating both existing and proposed development into the landscape.</p>		
LCA E3. FELIXSTOWE	LOW	<p>YEAR 1</p> <p>The site is well related to the existing settlement; Ferry Road and Gulpher Road define the northern edge of Old Felixstowe with recent development on Ferry Road immediately to the east. The land is allocated for residential development for up to 150 dwellings.</p> <p>Development would result in the loss of a small arable field which lies immediately adjacent to the existing settlement edge and extend development up to the scattered development along Gulpher Road (a Quiet Lane).</p> <p>Subject to detailed design, the layout of residential streets and buildings will reflect the prevailing pattern of the town with buildings a maximum of two storeys in height. Existing vegetation around the site boundaries will be predominantly retained and reinforced with new strategic native planting and an area of open space. Additional tree planting throughout the development will contribute to the character of the urban area and soften the built form; however, at Year 1 all new planting will be immature with limited impact.</p> <p>While existing vegetation along the lane will be retained and reinforced, the proximity of development (although set back) will change the character of the lane from predominantly rural to settlement edge. Development will extend closer to Park Cottages (Listed Building), albeit softened by new planting. For impact on the setting of heritage assets refer to separate Heritage Assessment.</p>	Medium Adverse	MINOR

Landscape Receptor	Sensitivity	Description	Magnitude, Nature of Change	Significance
		Overall, the development of the area will be a noticeable change, although not uncharacteristic when set within the existing context.		
		<p>YEAR 15</p> <p>The effects of the proposed development will decrease over time as strategic vegetation, street trees and planting matures complementing the built form and locally increasing the level of vegetation cover. While the development would still be a discernible change, it would not be uncharacteristic when set in the existing landscape context.</p> <p>With an appropriate detailed landscape scheme, the site and associated open space provides the opportunity to establish a softer settlement edge integrating both existing and proposed development into the landscape.</p>	Low Neutral to Beneficial	NEGLIGIBLE
J5. DEBEN VALLEY	MEDIUM	<p>YEAR 1</p> <p>The site is well related to the existing settlement; Ferry Road and Gulpher Road define the northern edge of Old Felixstowe with recent development on Ferry Road immediately to the east. The land is allocated for residential development for up to 150 dwellings.</p> <p>Development would result in the loss of a small arable field which lies immediately adjacent to the existing settlement edge and extend development up to Gulpher Road (a Quiet Lane), resulting in a minor reduction in the physical buffer between the town of Felixstowe and the AONB at this point. Development would be no closer to the AONB boundary than the recent development to the east and set between existing scattered development on the northern edge of the town and the established abrupt settlement edge.</p> <p>Subject to detailed design, the layout of residential streets and buildings will reflect the prevailing pattern of development on the edge of the town with buildings a maximum of two storeys in height. Existing vegetation around the site boundaries will be predominantly retained and reinforced with new strategic native planting and an area of open space to break up the settlement edge and provide a landscape structure into which the development will sit. Additional tree planting</p>	Low Adverse	MINOR

Landscape Receptor	Sensitivity	Description	Magnitude, Nature of Change	Significance
		<p>throughout the development will contribute to its character and soften the built form. At Year 1 all new planting will be immature with limited impact.</p> <p>Overall the development of the area will result in a noticeable, but localised change. This change is not uncharacteristic when set within the existing context where the existing settlement is already an important aspect of landscape character. Effects on the heart of the Deben Valley and its special qualities will be limited by the sites location set back from the break in the valley slope, with the topography of the ridge and surrounding development restricting inter visibility.</p>		
		<p>YEAR 15</p> <p>The effects of the proposed development will decrease over time as strategic vegetation (particularly along the northern boundary), street trees and planting matures complementing the built form and locally increasing the level of vegetation cover. While the development would still be a discernible but localised change, it would not be uncharacteristic when set in the existing landscape context.</p> <p>With an appropriate detailed landscape scheme the site and associated open space provides the opportunity to establish a softer settlement edge integrating both existing and proposed development into the landscape. While the extent of development will increase, over time this could provide positive local enhancements to the edge of the settlement.</p> <p>The effect on the wider Deben Estuary is assessed as Negligible.</p>	Low Neutral / Negligible	MINOR / NEGLECTIBLE

Landscape Receptor	Sensitivity	Description	Magnitude, Nature of Change	Significance
The Natural Beauty and Special Qualities of the Suffolk Coast & Heaths AONB: Landscape quality, Scenic quality, Relative wildness, Intrusiveness	MEDIUM	YEAR 1 Development would not result in a direct loss or impact upon the Natural Beauty and Special Qualities of the Suffolk Coast & Heaths AONB. There would be loss of a small arable field which lies immediately adjacent to the existing settlement edge and extend development up to Gulpher Road (a Quiet Lane), resulting in a minor reduction in the physical buffer between the town of Felixstowe and the AONB at this point. Development would be no closer to the AONB boundary than the recent development to the east and set between existing scattered development on the northern edge of the town and the established abrupt settlement edge.	Low Neutral	MINOR
		YEAR 15 The effects of the proposed development will decrease over time as strategic vegetation (particularly along the northern boundary), street trees and planting matures complementing the built form and locally increasing the level of vegetation cover. While the development would still be a discernible this would be a minor change with a very minor effect upon the natural beauty and special qualities of the Suffolk Coast and Heaths AONB With an appropriate detailed landscape scheme the site and associated open space provides the opportunity to establish a softer settlement edge integrating both existing and proposed development into the landscape. While the extent of development will increase, over time this could provide positive local enhancements to the edge of the settlement. The effect on the Suffolk Coast and Heaths AONB is assessed as Negligible.	Low Neutral / Negligible	MINOR / NEGLIGIBLE
Refer to Appendix 7.2: Tables B and E for assessment criteria. Significance (refer to Appendix 7.2 Section 1.4) is highlighted in <u>red</u> .				

Table 7.4: Magnitude and scale of townscape effects

Landscape Receptor	Sensitivity	Description	Magnitude / Nature of Change	Significance
Edge of town	HIGH	<p>YEAR 1</p> <p>Although the details are reserved for later consideration, the concept layout demonstrates the principles of the development and associated landscape, which reflects the prevailing pattern of the town and would be consistent with the surrounding pattern of development.</p> <p>Whilst there would be a noticeable and apparent change at the site level, the development would not be uncharacteristic in relation to the surrounding context.</p>	Low Neutral / Negligible	MINOR
		<p>YEAR 15</p> <p>Subject to detailed design, the layout, built form (height, scale, massing, building style and materials) and landscaping will complement the surrounding settlement. The magnitude and nature of the effects will therefore change over time as strategic vegetation (including native hedgerows and trees, street trees and other planting) matures.</p> <p>Whilst still a noticeable and apparent change at the site level, the development would not be uncharacteristic within the surrounding context. With an appropriate detailed landscape scheme the site provides the opportunity to locally increase vegetation cover and establish a softer settlement edge integrating both existing and proposed development into the landscape.</p>	Low Neutral to Beneficial	MINOR
Topography/ building heights	MEDIUM	<p>YEAR 1</p> <p>Although the details are reserved for later consideration, the concept layout demonstrates the principles of the development and associated landscape with buildings up to two storeys in height, which reflects the prevailing height pattern of the town.</p>	Low Neutral / Negligible	MINOR/ NEGLIGIBLE
		<p>YEAR 15</p> <p>The overall height of the proposed development will blend in more with its surroundings over time as strategic vegetation, street trees and planting matures, complementing the built form and locally increasing the level of vegetation cover. While the development would still be a</p>	Negligible	NEGLIGIBLE

Landscape Receptor	Sensitivity	Description	Magnitude / Nature of Change	Significance
		discernible change, it would not be uncharacteristic when set in the existing landscape context.		
Movement and linkages	MEDIUM	<p>YEAR 1</p> <p>Although the details are reserved for later consideration, the concept layout demonstrates the proposed development will create linkages into the development to the east. The road layout is legible, accessible and reflects the existing pattern of development.</p>	Low Neutral	NEGLIGIBLE
		<p>YEAR 15</p> <p>The road surface material will have weathered and the proposed roads will have blended into their surroundings.</p>	Negligible	NEGLIGIBLE
Land use	HIGH	<p>YEAR 1</p> <p>The proposed development would cause a change of use from agricultural fields to residential. However, it would be well integrated into the surrounding pattern of development and would reflect the prevailing pattern of the town.</p>	Low Neutral / Negligible	MODERATE-MINOR
		<p>YEAR 15</p> <p>The overall aspect of the proposed development will become less harsh and urban with its surroundings over time as strategic vegetation, street trees and planting matures complementing the built form and locally increasing the level of vegetation cover. While the development would still be a discernible change, it would not be uncharacteristic when set in the existing landscape context.</p>	Negligible	MINOR
Distinctive character	HIGH	<p>YEAR 1</p> <p>The character of the existing settlement edge will change however, the proposed development represents an opportunity to improve the sense of place and character by incorporating high-quality buildings into a well-designed landscaped scheme. With an appropriate detailed landscape scheme, the site and associated open space provides the opportunity to establish a softer settlement edge integrating both existing and proposed development into the landscape.</p>	Low Neutral to Beneficial	MODERATE

Landscape Receptor	Sensitivity	Description	Magnitude / Nature of Change	Significance
		YEAR 15 With an appropriate detailed landscape scheme the site and associated open space provides the opportunity to establish a softer settlement edge integrating both existing and proposed development into the landscape. The character of the proposed development will therefore change and strengthen over time as strategic vegetation (including native hedgerows and trees, street trees and other planting) matures.	Low Neutral to Beneficial	MODERATE
Attractive spaces	HIGH	YEAR 1 With an appropriate detailed landscape scheme the site and associated open space provides the opportunity to establish a softer settlement edge integrating both existing and proposed development into the landscape. The Public Open Space will provide a valuable amenity for informal recreation and community use. The incorporation of sympathetically designed SuDS feature will significantly enhance the biodiversity of this area and new native planting will add to the ecological interest and create long term ecological networks across and around the Site.	Low Neutral to Beneficial	MODERATE
		YEAR 15 By year 15 the strategic vegetation (particularly along the northern boundary), street trees and planting matures complementing the built form and locally increasing the level of vegetation cover, which will improve the sense of place and general attractiveness of the scheme.	Low Neutral to Beneficial	MODERATE
		Refer to Appendix 7.2: Tables B and E for assessment criteria. Significance (refer to Appendix 7.2 Section 1.4) is highlighted in <u>red</u> .		

Assessment of landscape effects

7.137 Based on an assessment of the sensitivity of the landscape receptors and magnitude of change, the overall effects of the development on the landscape resource and their significance are described in Table 7.3. On Table 7.4 a similar assessment was undertaken for the townscape elements.

- 7.138 The principal changes will occur within the Site and its immediately surrounding area, particularly following the completion of the development. The character of the Site will permanently change from an existing arable field to a residential area comprising buildings, streets and open space. While the details of the development are reserved for later consideration, the Concept Layout establishes the strategic principles of the scheme and its associated landscape with buildings up to a maximum of two storeys in height.
- 7.139 The existing vegetation around the boundary of the Site will be predominantly retained and enhanced with the open space and new native hedgerow and tree planting creating a visual and ecological buffer and providing a structure into which the new buildings will sit. The temporary loss of vegetation required to enable access will be replaced as part of the landscape scheme. The open space will provide a valuable amenity for informal recreation and community use and break up the buildings along the settlement edge.
- 7.140 The landscape effects at the Site level are subsequently assessed as Moderate Adverse at Year 1 reducing to Minor Adverse by Year 15 once the vegetation framework has established. While the change will be noticeable, the development would not be uncharacteristic when set within the surrounding context.
- 7.141 The Site is well located in relation to the existing topography and settlement pattern. The combination of the retention of the majority of the boundary vegetation, an appropriate and well-designed layout and new planting will ensure that other landscape effects are short-term, and/or limited in their magnitude and extent.
- 7.142 In respect of the settlement of Felixstowe (LCA E3.) the change in character is assessed as Minor Adverse at Year 1 reducing to Negligible by Year 15. As highlighted above, the Site is well related to the surrounding built form of Ferry Road and Gulpher Road and subject to detailed design the development will generally complement the character of the area. While existing vegetation along Gulpher Lane will be retained and reinforced, the proximity of the development (although set back) will alter the character of the lane from predominantly rural to settlement edge. This will be partially mitigated by the open space and new planting, which over time will provide the opportunity to establish a softer settlement edge integrating both existing and proposed development into the landscape.
- 7.143 The Deben Valley (LCA J5.) is identified as a highly valued landscape, the special qualities of which contribute to the distinctive character of the Suffolk Coast and Heaths AONB and its sense of place. While the main part of the area slopes away from the settlement towards the estuary, the location of the Site on the flat elevated area on the edge of the settlement is set back from the break in the valley slope. This aids visual separation, with the topography of the ridge and the scattered properties along Gulpher Road to the north providing a buffer. Nevertheless, the area along Gulpher Road still provides the immediate landscape setting to this part of the town.

- 7.144 The development of the Site would result in a minor reduction in the physical buffer between the town of Felixstowe and the AONB at this point. Development however would be no closer to the AONB boundary than the recent development to the east, set between existing scattered properties on the northern edge of the town and the established but abrupt settlement edge.
- 7.145 Development would not result in a direct loss or impact upon the Natural Beauty and Special Qualities of the Suffolk Coast & Heaths AONB. There would be loss of a small arable field which lies immediately adjacent to the existing settlement edge and extend development up to Gulpher Road (a Quiet Lane), resulting in a minor reduction in the physical buffer between the town of Felixstowe and the AONB at this point. The effects of the proposed development will decrease over time as strategic vegetation (particularly along the northern boundary), street trees and planting matures complementing the built form and locally increasing the level of vegetation cover. While the development would still be a discernible this would be a minor change with a very minor effect upon the natural beauty and special qualities of the Suffolk Coast and Heaths AONB.
- 7.146 Subject to detailed design there will be a localised effect on the Deben Valley LCA where it adjoins the edge of the town. This is assessed as Minor Adverse at Year 1 reducing to Minor Neutral / Negligible over time as vegetation, particularly on the boundary of the Site establishes. The detailed landscape scheme and associated open space provides the opportunity to establish an integrated settlement edge. The wider residual effects on the Deben Valley and Suffolk Coast and Heaths are assessed as Negligible in the context of the surrounding development.
- 7.147 An assessment of the development impact upon townscape elements has also been undertaken with the magnitude of change ranging from Low Neutral to Beneficial. Subject to detailed design, the layout, built form (height, scale, massing, building style and materials) and landscaping will complement the surrounding settlement and whilst still a noticeable and apparent change at the site level, the development would not be uncharacteristic within the surrounding context. With an appropriate detailed landscape scheme, the site provides the opportunity to locally increase vegetation cover and establish a softer settlement edge integrating both existing and proposed development into the landscape. The proposed building heights match the existing ones, the development is well connected into the existing movement framework and there is an opportunity to design a development with a distinctive character and range of attractive spaces which will complement the surroundings and enhance the edge of town location.

Visual assessment

(a) Scope

- 7.148 This section describes the existing views of the Site from a variety of public viewpoints and how these and the visual amenity experienced by people both living and visiting the area will change.

(b) Visual baseline

Extent of visibility

- 7.149 The visibility of the Site has been determined by a manual assessment of topography and aerial images followed by an assessment on site and a field survey of the study area. The resulting visual envelope shown on Figure 6 demonstrates the approximate extent of the area from which the Site can be seen.
- 7.150 As described in the Landscape Assessment section the town of Felixstowe extends along a long shoulder of elevated land between the Orwell and Deben Estuaries and over time has expanded onto the main spine of the peninsula. Old Felixstowe to the north of the town sits predominantly on the high plateau sandlands above the Deben Valley. The landscape is one of predominantly residential and other development fringed by arable fields with limited woodland and hedged field boundaries. Beyond the ridge to the north the land falls away into the low-lying coastal levels and marshes that fringe the river.
- 7.151 The combination of topography, vegetation and development enables a variety of both open and enclosed views. From within the Deben Valley, views along and across the estuary are open and expansive; the rising ground of the valley slopes (steep in parts), form an agricultural backdrop and generally well treed skyline.
- 7.152 As shown on Figure 7 the visual envelope of the proposed development extends for a short distance to the north due to the topography of the ridge with middle distance views across the landscape from the west. Views from the east and south are constrained by existing development and ensures that overall, the Site is relatively well enclosed within its immediate setting. No views from the estuary or across the estuary as well as on approach into town from the west have been identified – as stated in the Scoping Report and therefore confirmed in the Scoping Opinion (Appendix 7.4) ‘it is therefore unlikely that there will be any change to views from the Deben Valley towards the site; any glimpses will be seen at a distance and in the context of the existing edge of Felixstowe’s built-up area’.
- 7.153 As agreed with Strategic Landscape Advisor at East Suffolk Council (email 1st September 2022 – Appendix 7.5) the most likely intervisibility with the AONB is to the northeast corner of the site.

Potential visual receptors

7.154 Within the visual envelope, the visual receptors ie. those individuals who may experience changes in visual amenity, include:

Residential and other Properties:

- Residents on Ferry Road along the eastern boundary of the site;
- Residents on Gulpher Road including Whitehouse Cottages to the north, from the near the Grove and from Gulpher Farm
- Residents of Park Farm Cottages (Grade II Listed) to the north west corner of the Site;
- Residents on Swallow Close and Conway Close immediately to the south of the Site; and
- Residents of Upperhill Drive to the south west of the Site.

Users of Roads and Lanes:

- Ferry Road;
- Gulpher Road; and
- Marsh Lane.

Users of Public Rights of Way:

- Footpaths 12 which runs along the southern boundary of the Site;
- Footpath 13 which runs to the west of the Site joining up with Hyem's Lane (PRoW 16 bridleway);
- Footpath 7 which runs east from Ferry Road towards the coast;
- Footpath 5 which runs around the top of the ridgeline around towards Gulpher Hall; and
- Footpath 51 which runs along Upperhill Drive. An informal footpath also follows the field boundary to the north of these dwellings.

Users of Recreational Areas

- Ferry Golf Course

7.155 Within the visual envelope twenty representative viewpoints have been identified. The location of these viewpoints is shown on Figure 6.

7.156 The viewpoints and location / methodology of photomontages were agreed with the LPA East Suffolk Council during a meeting which took place on 28th July 2022. They have been selected to illustrate the degree of visibility of the Site and the visual amenity experienced by receptors and provide a baseline against which the visual effects of the proposed development can be assessed. Such views broadly fall into the following categories:

- Representative: illustrating views from within a wider area, for example 'typical' views from a group of houses, along a street or public right of way; and
- Illustrative: demonstrating a particular effect or issue, for example limited visibility in an area where views might normally be anticipated.

7.157 Photographs representing views from private residential dwellings, particularly those bordering the site, are based on the nearest possible publicly accessible location.

7.158 Annotated winter and/or summer baseline photographs taken at each viewpoint (Type I Visualisations, Landscape Institute TGN 06/19 Visual Representation of Development Proposals) are provided as Views 01-20 on Figures 8.01-8.20.

7.159 To accompany the assessment, photomontages (Type 3 Non Verified Visualisations, Landscape Institute TGN 06/19 Visual Representation of Development Proposals) have been prepared from selected viewpoint locations (Views 07, 09, 12, 17, 19 and 20). The photomontages, based on the illustrative layout and generic house types 2 storeys in height, illustrate the potential broad extent, scale and massing of the development in its context at Year 1 noting that scale, appearance and landscape are all reserved matters. The methodology is provided in section 1.6 of Appendix 7.2.

7.160 While the photographs and visualisations provide a good indication of visual amenity and the existing visibility of the Site it is recommended that all views are best experienced in the field.

(c) Sensitivity of visual receptors

7.161 In accordance with GLVIA3 the sensitivity of visual receptors is determined by combining value with their susceptibility to change. The sensitivity of the receptors to the proposed development is set out in the visual analysis for each viewpoint (Table 7.5).

7.162 Receptors with the highest sensitivity generally include residents and users of public rights of way, while those of lower sensitivity include people in their place of work, playing sport or travelling by car and public transport.

(d) Visual effects

Magnitude of visual change

7.163 The changes to existing views are described in Table 7.5.

7.164 Considerations in determining the magnitude of visual change include:

- The nature of the view - for example full, partial, glimpsed;
- The proportion of the development that would be visible - all, part, none;
- The distance of the viewpoint from the site and whether the viewer would focus on the development due to its scale and/or proximity or whether it would comprise a small, minor element in a panoramic view;
- Whether the view is stationary, transient, or one of a sequence of views, as experienced from a footpath or moving vehicle; and
- The nature of the change through the removal or introduction of features (natural or built) and any associated alterations to the profile of the skyline, visual simplicity/complexity, enclosure/ openness and scale.

7.165 All of the effects at Year 15 are considered to be permanent.

Assessment of visual effects

7.166 The overall effect on existing views based on an assessment of the sensitivity of the receptor and the magnitude of change is set out for each viewpoint on Table 7.5. From the town and surrounding countryside the site is relatively well contained by the local topography, existing vegetation and surrounding development. Visual effects will therefore occur within a relatively limited area, broadly confined to the adjoining residential properties, roads and footpaths (predominantly within 0.5km but extending to 1km and beyond).

7.167 The nature of visual effects is subjective. While the loss of land to new development can be judged as having a negative visual influence, the proposed site, owing to its location is visually well-related to the existing settlement and in the majority of locations will be seen in the context of existing buildings on the edge of the town. Subject to the final design and layout, over time as planting establishes, the buildings and associated landscape will complement existing views.

7.168 Park Farm Cottages sit adjacent to the north western corner of the Site. This property is Grade II Listed and therefore the setting of it needs careful consideration under National Planning Policy. The planning policy acknowledges the presence of the Listed Building and the design of the proposals has taken this into account and sought to reduce the visual impact of development on this heritage asset through new planting on the site boundary.

- 7.169 The principal visual effects of the proposed development will be experienced from those receptors within and immediately adjacent to the site, namely public footpath 12; existing properties on Conway Close, Swallow Close and Upperfield Drive to the south; Ferry Road to the east; Gulpher Road to the north; and Park Farm to the west.
- 7.170 The nature of the existing views will change with the open arable field on the settlement edge replaced with housing, streets and associated landscaping. Where dominated by the existing settlement edge, the built form will be brought closer into view.
- 7.171 Due to the proximity of the development the resulting visual effect on existing properties and public right of way to the south is assessed as Major-Substantial Adverse at Year 1, reducing to Moderate-Substantial Adverse by Year 15 as strategic vegetation establishes. Here the development will limit existing views out to the surrounding countryside to the north and west (these existing views extend out to Laurel Farm and do not include the AONB) and while the aspect will change from predominantly agricultural to residential the residential amenity of existing properties along the boundary of the site and the route of the footpath itself should be carefully considered.
- 7.172 From the north and east where views are already dominated by the existing settlement edge, the visual effect on existing properties and road users varies from Moderate to Minor Adverse at Year 1 to Moderate, Minor or Negligible Adverse or Neutral at Year 15. Here the creation of open space and set back of development, the retention of existing boundary vegetation and new planting will provide effective mitigation over time and integrate the new settlement edge. Subject to detailed design, the development and open space provides the opportunity to provide a positive landscape feature and focal point along the lane.
- 7.173 From the wider landscape to the west, the visual effects are dependent on distance. From the public footpaths immediately to the west (PRoW 12, 13 and 16 including Hyem's Lane) the lack of vegetation along the site boundary allows open views into the Site which is set in front of the existing abrupt settlement edge. The proposed development will bring the built form forward in the view and while initially clearly apparent, over time new planting along the western boundary will soften and integrate the buildings into the landscape. The visual effect is therefore assessed as Substantial to Moderate Adverse at Year 1 reducing to Moderate Adverse to Minor Neutral by Year 15.
- 7.174 Further to the west as the land falls into a shallow valley from PRoW 15, 17 and 18 and Gulpher Road a combination of the topography and vegetation around Park Farm limits views towards the site. While parts of the development will be visible, the retention and enhancement of the existing vegetation and new strategic planting will be effective at integrating both existing and proposed buildings into the landscape. The effect at Year 1 is subsequently assessed as Moderate to Minor Adverse, decreasing to Minor Neutral or Negligible over time.

- 7.175 Views south-east from Gulpher Road near Gulpher Farm and the Grove will suffer a minor change in visual impact, as development is unlikely to be discernible and any glimpses will be seen at distance, behind the existing tree coverage and in the context of existing development. By Year 15 the development will be bedded in and the associated strategic planting and open space will be well established softening the form of the development and locally increasing the level of vegetation cover. Tree planting around the northern and western boundaries will help to integrate the development into the landscape and settlement edge, further enhancing the character of the area. The effect at Year 1 is subsequently assessed as Low Adverse, decreasing to Minor or Negligible over time.
- 7.176 The views from the landscape to the north are contained by the ridge around Laurel Farm. The rising ground allows views south back towards the settlement edge, with existing buildings set amongst a reasonable framework of trees. From PRoW 5 and properties along Marsh Lane (including the boundary of the AONB), the development will be partially visible set between the clusters of existing properties on Gulpher Road and the established settlement edge. While there will be an increase in the extent of development, visual effects will be mitigated by the setting back of development and the creation of open space establishing an indented settlement edge. Existing vegetation will be enhanced by new strategic native tree planting. The visual effect at Year 1 is therefore assessed as Moderate-Minor Adverse reducing to Negligible at Year 15.
- 7.177 From within the Deben Valley and Coastal Levels, the rising ground of the valley slopes provides the backdrop to open and expansive views. The representative view from Felixstowe Ferry demonstrates the visibility of Felixstowe on the ridge and upper valley slopes to the south west, with the building on Marsh Lane a prominent feature on the skyline to the west. The site, which is situated beyond the break in slope is obscured by the topography and existing development. On the basis that the height will be restricted to a maximum of two storeys no change is anticipated to views from the core of the AONB and Deben Valley. Any glimpses will be seen at distance and in the in the context of existing development.

Table 7.5: visual effects

View 01 (Winter) – view looking north from informal footpath off Upperfield Drive between houses to adjacent field

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>This view is from one of the footpath access routes from Upperfield Drive which runs between the houses. The footpath then enters the field which provides an open view to the north. The site is located between Park Farm and the existing development off Upperfield Drive and is visible through the open section of the site boundary. Properties on Upperfield Drive and associated closes comprise a mix of predominantly mid to late 20th Century, single and two storey properties. The footpath route is an alternative route to Ferry Road and also heads north on a more rural route across Gulpher Road.</p> <p>The view is a relatively pleasant and rural one but has the detracting features of a modern housing estate, together with larger scale agricultural buildings associated with Laurel Farm in the more distant view on the horizon.</p>	Residents of Upperfield Drive	YEAR 1 (winter): Part of this view will be altered with the addition of a residential development in the middle distance. The new two storey buildings will be set within the context of the existing development along Upperfield Drive and will obscure views of the agricultural development beyond Gulpher Road. Views directly north will not alter. Boundary tree and hedge planting will initially be immature and strategic planting within the site is unlikely to be very visible.	MEDIUM ADVERSE	MODERATE - SUBSTANTIAL
	Users of PROW			
	Value: MEDIUM-LOW Susceptibility: HIGH Overall Sensitivity: MEDIUM-HIGH	YEAR 15 (summer): At year 15, the boundary tree and hedge planting will be established and will create a soft buffer to the development edge, integrating the development into the landscape. This buffer planting will provide additional vegetative cover within the local view where currently a hard settlement edge exists. Although closer in terms of views, the development and associated planting will obscure views to the larger scale agricultural buildings beyond Gulpher Road. In the long-term the footpath will be incorporated into the North Felixstowe Garden Neighbourhood.	LOW ADVERSE TO NEUTRAL	MODERATE-MINOR
Embedded mitigation	Tree and hedgerow planting to the western boundary.			

View 02 (Winter) – View looking north from Footpath 12 between Park Farm and properties adjacent to Upperfield Drive

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>The existing view is one of an agricultural landscape interspersed with groups of dwellings and farmsteads. The view is a relatively short one with the ridge of high ground (that runs around Laurel Farm) forming the horizon to this view and preventing views to the Deben Valley. The view is a relatively pleasant one but with a limited level of tree cover and an open feel.</p> <p>Detracting features include agricultural buildings and the masts at Park and Laurel Farms.</p>	Users of the PRoW	<p>YEAR 1 (winter): At Year 1, part of this agricultural view will be replaced with residential development and associated infrastructure and landscaping. Properties will be set back by a private drive, however, all new boundary and strategic planting will be immature.</p>	MEDIUM ADVERSE	SUBSTANTIAL-MODERATE
	Residents of Upperhill Close/Swallow Close			
	Value: MEDIUM Susceptibility: HIGH Overall Sensitivity: MEDIUM-HIGH	<p>YEAR 15 (summer): At Year 15, the development will be bedded in and all boundary and structure planting will be well established to provide a more vegetated view. The development will be seen within the context of the existing built up area and design and landscaping proposals will help to integrate the development into the landscape so that it does not appear at odds with the character.</p> <p>In the long-term the footpath will be incorporated into the North Felixstowe Garden Neighbourhood.</p>	MEDIUM-LOW ADVERSE	MODERATE
Embedded mitigation	Native tree and hedge planting to the western boundary of the Site.			

View 03 (Winter) – view looking north east across the Site from Footpath 12 towards the junction at Ferry Road/Gulpher Road

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>The existing view is of an agricultural field bounded on two sides by development (east and south). More isolated dwellings and the large agricultural buildings associated with Laurel Farm lie to the north east.</p> <p>Views west are more rural with isolated properties in the medium to long distance.</p> <p>Although the field provides some openness to this view, the views are relatively short due to the undulating nature of the landscape and surrounding development. The rising ground around Laurel Farm prevent views to the Deben Valley.</p>	<p>Users of the PRoW</p> <p>Residents at Upperfield Drive/Conway Close</p>	<p>YEAR 1 (winter):</p> <p>The nature of the existing view will change with the open arable field on the settlement edge replaced with housing, streets and associated landscaping which will be visible in the foreground along the length of the footpath route. The buildings will be softened by planting, which will be immature at year 1. Development will obscure the new development to the east of Ferry Road, together with the agricultural buildings beyond Gulpher Road which are a detracting feature.</p>	HIGH ADVERSE	SUBSTANTIAL-MAJOR
	<p>Value: MEDIUM-LOW</p> <p>Susceptibility: HIGH</p> <p>Overall Sensitivity: MEDIUM-HIGH</p>	<p>YEAR 15 (summer):</p> <p>The context of the footpath route will change from settlement edge to residential. Over time the design of the development will be softened by trees and planting. The nature of the change would not be entirely out of context with the surrounding development.</p>	MEDIUM ADVERSE	MODERATE-SUBSTANTIAL
Embedded mitigation	Native tree and hedgerow boundary planting together with strategic planting within the Site.			

View 04 (Winter) – view looking south east towards the Site from Bridleway 16 where it joins Hyem's Lane

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>This view is taken from along the PRoW where it joins Hyem's Lane. The view to the west is a more rural one, whilst this view, although of an agricultural foreground, is framed by existing dwellings, together with the introduction of new dwellings being constructed east of Ferry Road through the open section in the western boundary. There are a number of detracting features including the mast at Park Farm and the suburbanised backdrop to this view.</p> <p>Once development east of Ferry Road is complete, the whole view will be of development with a hard boundary edge to this development along Ferry Road. There is little intervening vegetation to soften this view.</p>	Users of the PRoW	<p>YEAR 1 (winter): At Year 1, the view of the existing housing will be brought closer. The development east of Ferry Road will be complete and the proposed development will replace the view of that development. Planting along the open section of the western boundary will be immature.</p>	MEDIUM ADVERSE	MODERATE - SUBSTANTIAL
	Value: MEDIUM-LOW	<p>YEAR 15 (summer): At Year 15, the development will be bedded in and the strategic planting along the western boundary of the proposed development will be well established. Although development will obviously be apparent, there will be a much softer development edge with the use of good quality native tree and hedge planting. This will increase the overall vegetative cover locally and will help to integrate the development into the view.</p> <p>In the long-term the footpath will be incorporated into the North Felixstowe Garden Neighbourhood.</p>	LOW ADVERSE TO NEUTRAL	MODERATE-MINOR
	Susceptibility: HIGH			
Embedded mitigation	Overall Sensitivity: MEDIUM-HIGH			
	Native tree and hedgerow planting to the western boundary of the Site in addition to POS in the north western corner.			

View 05 (Winter) – view looking east towards the Site from Hyem’s Lane (Bridleway 16)

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>The existing view is of an agricultural landscape with a backdrop of residential development. Existing dwellings off Upperhill Drive provide a very hard settlement edge, whilst new development under construction east of Ferry Road will equally form a hard edge along Ferry Road.</p> <p>The Site is partly open to views to the south, with the vegetation around Park Farm providing localised screening.</p>	Users of the PRow	<p>YEAR 1 (winter):</p> <p>At Year 1, the view of the existing housing will be brought closer. The development east of Ferry Road will be complete and the new buildings within the site will replace the view of that development. Planting along the western boundary will be immature, with vegetation around Park Farm providing partial screening to the northern section of the development.</p>	MEDIUM-LOW ADVERSE	MODERATE
	Value: MEDIUM-LOW	<p>YEAR 15 (summer):</p> <p>At Year 15, the development will be bedded in and the strategic planting along the western boundary of the proposed development will be well established. Although development will obviously be apparent, there will be a much softer development edge with the use of good quality native tree and hedge planting. This will increase the overall vegetative cover locally and will help to integrate the development into the view.</p> <p>In the long-term the footpath will be incorporated into the North Felixstowe Garden Neighbourhood.</p>	LOW ADVERSE TO NEUTRAL	MODERATE-MINOR
	Susceptibility: HIGH			
	Overall Sensitivity: MEDIUM-HIGH			
Embedded mitigation	Native boundary tree and hedge planting to the western boundary.			

View 06 (Winter/Summer) – view looking east from further along Hyem’s Lane on the junction of PROW 15, 16, 17 and 18

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>The existing view is of a predominantly agricultural scene. There are detracting features such as the masts at Park Farm and Laurel Farm as well as some large unsightly agricultural buildings. Mid 20th Century development along Upperhill Drive is evident, although this is predominantly single storey. New development under construction east of Ferry Road is visible on the skyline and a hard settlement edge exists to all existing dwellings.</p> <p>Land falls away to the west of the Site and Hyem’s Lane sits somewhat lower than the fields to the south, limiting the visibility of the site.</p>	Users of the PROW	<p>YEAR 1 (winter): In Year 1, this view will be partly taken up by the introduction of residential development. This will be seen in the distance within the context of existing mid 20th Century and new development off Ferry Road. Boundary planting will be immature and the proposed development will replace the view of new housing east of Ferry Road.</p>	LOW ADVERSE	MODERATE - MINOR
	Value: MEDIUM	<p>YEAR 15 (summer): By Year 15, all boundary and strategic planting will be well established creating a softer settlement edge. Proposed dwellings will be integrated into the landscape and seen within the context of existing residential development. This will increase the overall vegetative cover locally and will help to integrate the development into the view.</p> <p>In the long-term the footpath will be incorporated into the North Felixstowe Garden Neighbourhood.</p>	LOW ADVERSE - NEGLIGIBLE	MINOR
	Susceptibility: HIGH			
Overall Sensitivity: MEDIUM-HIGH				
Embedded mitigation	Native tree and hedgerow planting to the western boundary and POS to north west of the Site			

View 07 (Summer) – view looking east from PROW 17 half way between Hyem's Lane and Gulpher Road

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>This view was taken looking east from PROW 17 half way between Hyem’s Lane and Gulpher Road.</p> <p>The development occupies a central position in the view. The existing view is of a predominantly agricultural scene. There are detracting features such as the masts at Park Farm and Laurel Farm as well as some large unsightly agricultural buildings.</p> <p>Mid 20th Century development along Gulpher Road is visible as well as Fleet House. Upperhill Drive is discernable, although this is predominantly single storey. Development on Swallow Close is also visible.</p> <p>New development under construction east of Ferry Road is visible on the skyline and a hard settlement edge exists to all existing dwellings.</p> <p>Land falls away to the west of the Site and Hyem’s Lane sits somewhat lower than the fields to the south, limiting the visibility of the site.</p>	Users of the PROW	<p>YEAR 1 (winter):</p> <p>In Year 1, this view will be partly taken up by the introduction of residential development. This will be seen in the distance within the context of existing mid 20th Century and new development off Ferry Road. Boundary planting will be immature and the proposed development will replace the view of new housing east of Ferry Road.</p>	LOW ADVERSE	MODERATE-MINOR
	Value: MEDIUM	<p>YEAR 15 (summer):</p> <p>By Year 15, all boundary and strategic planting will be well established creating a softer settlement edge. Proposed dwellings will be integrated into the landscape and seen within the context of existing residential development. This will increase the overall vegetative cover locally and will help to integrate the development into the view.</p> <p>In the long-term the footpath will be incorporated into the North Felixstowe Garden Neighbourhood.</p>	LOW ADVERSE - NEGLIGIBLE	MINOR
	Susceptibility: HIGH			
	Overall Sensitivity: MEDIUM-HIGH			
Embedded mitigation	Native tree and hedgerow planting to the western boundary and POS to north west of the Site			

View 08 (Winter/Summer) – view looking south east towards the Site from Footpath 17

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>This view is from PRoW 17 where it joins Gulpher Road to the west of the Site. Here, the landscape is somewhat different to the plateau/ridge beyond with a more undulating landscape as it leads down to the river valley to the north east. This character area is more wooded and has a more intimate feel with good quality hedgerows and mature hedgerow/specimen trees.</p> <p>There are few detracting features but structures associated with Park Farm, including the mast are evident in the landscape.</p>	Users of the PRoW Road users travelling east along Gulpher Road	<p>YEAR 1 (winter): Due to the undulating nature of the landscape at this point and the falling ground to the north and west, only part of the Site will be visible in this view. The extent of the built form along Gulpher Road will increase, with the open space and associated planting creating a break in the built form and softer edge. The retained hedge along the lane will provide limited screening, with new planting immature at Year 1. Further south within the Site, similar to the existing properties on Upperfield Drive some rooftops may be evident beyond the horizon but these will gradually disappear beyond the intervening topography.</p>	LOW ADVERSE	MODERATE-MINOR
	Value: MEDIUM-HIGH	<p>YEAR 15 (summer): At Year 15, native tree and hedgerow boundary planting will be well established as well as planting associated with the POS to the north eastern corner of the Site. These landscape elements will predominantly screen views of the development from this location and will integrate the development into the view.</p> <p>In the long-term the footpath will be incorporated into the North Felixstowe Garden Neighbourhood.</p>	LOW ADVERSE - NEGLIGIBLE	MINOR
	Susceptibility: MEDIUM-HIGH			
Embedded mitigation	Overall Sensitivity: MEDIUM-HIGH			
Public Open Space (including good quality landscaping). Development set back from site boundaries with majority of existing hedgerow retained and enhanced with native strategic tree planting to reinforce the existing hedgerow to the northern and west of the Site.				

View 09 (Winter/Summer) – view looking south towards the Site from the PRow 5 adjacent to Hill Cottage

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>To the south of Gulpher Road, the land rises quite steeply up to this point on the ridge. From the northeast views from the route of footpath 5 to the south are predominantly obscured. This small section of PRoW as it heads south is on the high point around Laurel Farm affording views to the south and to the settlement beyond. The view is located near the boundary of the Suffolk Coast and Heaths AONB.</p> <p>The view is an agricultural one with a backdrop of residential development and agricultural buildings. The large buildings at Laurel Farm are a dominating feature within the landscape for some distance, sitting on a high point of the plateau. These are detracting features within the landscape and provide a focal point from the wider area.</p>	Users of the PRoW	<p>YEAR 1 (winter): Development at Year 1 will just be evident beyond Whitehouse Cottages at distance but will be set against the backdrop of existing development off Upperhill Drive. Boundary tree planting to the northern boundary will augment the existing boundary vegetation but will be immature.</p> <p>YEAR 15 (summer): By year 15, the development will have bedded in and native tree planting on the northern boundary as well as strategic planting within the Site (including the POS to the north western corner) will be well established and will soften the views of the development. Careful design and high quality landscaping will integrate the development into the existing scene and will not impact on the character of the area.</p>	LOW ADVERSE	MODERATE-MINOR
	Residents at Hill Cottage/ Laurel Farm			
	Value: MEDIUM-LOW			
	Susceptibility: HIGH			
Overall Sensitivity: MEDIUM-HIGH			NEGLIGIBLE	NEGLIGIBLE
Embedded mitigation	Development set back from the northern boundary with existing hedgerow retained and enhanced. Native tree planting along the northern boundary of the Site together with the open space to the north eastern corner and other strategic planting within the Site.			

View 10 (Winter/Summer) – view looking south from the PRow 5 from Laurel Farm

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
This view is located along the PRow which runs south from Laurel Farm/Hill Cottage and shows the Site beyond existing vegetation along Gulpher Road. The view is predominantly of the settlement edge with housing estates and clusters of dwellings on the outskirts. A limited level of good quality tree cover exists on the edge of the high ridge at Hill Cottage/Laurel Farm.	Users of the PRow Residents along Ferry Road / Gulpher Road	YEAR 1 (winter): The junction of Gulpher Road and Ferry Road will comprise a large area of open space, providing a focal point along the lane in the foreground. The majority of the existing hedge will be retained and the open space landscaped as an important amenity and SuDS area. New strategic tree planting within the open space and along Ferry Road including replacement sections of native hedge (where removed to enable access into the site) will initially be immature. The development will be visible in the background framing and enclosing Ferry Road, Gulpher Road and the edge of the open space.	LOW ADVERSE	MODERATE-MINOR
	Value: MEDIUM-LOW	YEAR 15 (summer): By Year 15 the development will be bedded in and the associated strategic planting and open space will be well established softening the form of the development. Tree planting around the northern and eastern boundaries will help to integrate the development into the landscape and settlement edge, further enhancing the character of the area. The view is relatively pleasant but is of a town edge character and will not be unduly altered in character. Subject to detail design there is potential for the development to provide a positive feature.	NEGLIGIBLE	NEGLIGIBLE
	Susceptibility: HIGH			
	Overall Sensitivity: MEDIUM-HIGH			
Embedded mitigation	Location of open space providing an important focal point along the lane. Development set back from site boundaries with majority of existing hedgerow retained and enhanced with native strategic tree planting. Section of hedgerow removed for site access to be replaced.			

View 11 (Winter/Summer) – view southwest from the junction with Ferry Road/Gulpher Road

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>The existing view shows the Site to the west of Ferry Road, whilst new development under construction sits to the east. Good boundary hedging to the Site together with a few good quality trees provide the only appreciable elements in this view, this forming the edge of the town/settlement.</p> <p>This point gives access to the PRow to the north of Ferry Road.</p>	<p>Road users (pedestrians and drivers)</p> <p>Residents along Ferry Road</p>	<p>YEAR 1 (winter): The junction of Gulpher Road and Ferry Road will comprise a large area of open space, providing a focal point along the lane in the foreground. The majority of the existing hedge will be retained and the open space landscaped as an important amenity and SuDS area. New strategic tree planting within the open space and along Ferry Road including replacement sections of native hedge (where removed to enable access into the site) will initially be immature. The development will be visible in the background framing and enclosing Ferry Road and the edge of the open space.</p>	MEDIUM-LOW ADVERSE	MODERATE-MINOR
	<p>Value: MEDIUM-LOW</p> <p>Susceptibility: MEDIUM</p> <p>Overall Sensitivity: MEDIUM</p>	<p>YEAR 15 (summer): By Year 15 the development will be bedded in and the associated strategic planting and open space will be well established softening the form of the development. Tree planting around the northern and eastern boundaries will help to integrate the development into the landscape and settlement edge, further enhancing the character of the area. The view is relatively pleasant but is of a town edge character and will not be unduly altered in character. Subject to detail design there is potential for the development to provide a positive feature.</p>	LOW ADVERSE TO NEUTRAL	MINOR
Embedded mitigation	<p>Location of open space providing an important focal point along the lane. Development set back from site boundaries with majority of existing hedgerow retained and enhanced with native strategic tree planting. Sections of hedgerow removed for site access to be replaced.</p>			

View 12 (Winter/Summer) – view looking south down Ferry Road showing the Site on the right beyond existing vegetation

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>This view looking directly at the north eastern boundary of the Site is from the junction of Ferry Road/Gulpher Road looking south west. The view shows a good quality boundary hedge to north and north east of the Site.</p> <p>To the left of the view is new development under construction east of Ferry Road. Mid-late 20th Century dwellings off Ferry Road/Upperhill Drive are just evident within the view.</p>	<p>Road users (Pedestrians/ Drivers)</p> <p>Residents along Ferry Road</p>	<p>YEAR 1 (winter):</p> <p>The junction of Gulpher Road and Ferry Road will comprise a large area of open space, providing a focal point along the lane in the foreground. The majority of the existing hedge will be retained and the open space landscaped as an important amenity and SuDS area. New strategic tree planting within the open space and along Ferry Road including replacement sections of native hedge (where removed to enable access into the site) will initially be immature. The development will be visible in the background framing and enclosing Ferry Road, Gulpher Road and the edge of the open space.</p>	<p>MEDIUM-LOW ADVERSE</p>	<p>MODERATE-MINOR</p>
	<p>Value: MEDIUM</p> <p>Susceptibility: MEDIUM</p> <p>Overall Sensitivity: MEDIUM</p>	<p>YEAR 15 (summer):</p> <p>By Year 15 the development will be bedded in and the associated strategic planting and open space will be well established softening the form of the development. Tree planting around the northern and eastern boundaries will help to integrate the development into the landscape and settlement edge, further enhancing the character of the area. The view is relatively pleasant but is of a town edge character and will not be unduly altered in character. Subject to detail design there is potential for the development to provide a positive feature.</p>	<p>LOW ADVERSE TO NEUTRAL</p>	<p>MINOR</p>
Embedded mitigation	<p>Location of open space providing an important focal point along the lane. Development set back from site boundaries with majority of existing hedgerow retained and enhanced with native strategic tree planting.</p>			

View 13 (Winter) – view looking west along Ferry Road (at the junction with Marsh End) towards the junction where it turns to Gulpher Road

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>The existing view is close to the junction of Ferry Road/Marsh End looking towards Gulpher Road and the Site immediately ahead beyond the existing hedge.</p> <p>New development east of Ferry Road is located to the left of this view behind the existing vegetation and will be visible once development is complete.</p> <p>The location of the viewpoint is close to the boundary of the Suffolk Coast and Heaths AONB.</p>	Road users (pedestrians and drivers)	<p>YEAR 1 (winter): The junction of Gulpher Road and Ferry Road will comprise a large area of open space, providing a focal point along the lane. The existing hedge will be retained and the open space landscaped as an important amenity and SuDS area. New strategic tree planting within the open space will initially be immature. The development will be glimpsed beyond the open space and would not be out of context with the surrounding development along the lane.</p>	LOW ADVERSE-NEGLIGIBLE	MINOR/NEGLIGIBLE
	Value: MEDIUM-LOW	<p>YEAR 15 (summer): By Year 15 the development will be bedded in and the associated strategic planting and open space will be well established softening the form of the development and locally increasing the level of vegetation cover. Tree planting around the northern and eastern boundaries will help to integrate the development into the landscape and settlement edge, further enhancing the character of the area. Subject to detail design there is potential for the development to provide a positive feature.</p>	NEGLIGIBLE	NEGLIGIBLE
	Susceptibility: MEDIUM			
	Overall Sensitivity: MEDIUM			
Embedded mitigation	Location of open space providing an important focal point along the lane. Development set back from site boundaries with existing hedgerow retained and enhanced with native strategic tree planting.			

View 14 (Summer) – view west into the Site from Ransom Road, entrance to Laureate Fields

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>The existing view is framed by the new properties along Ransom Road at the entrance to Laureate Fields.</p> <p>On the opposite side of the road, beyond these dwellings is an agricultural field (the Site).</p> <p>The existing boundary of Swallow Close forms part of the existing settlement edge. The Mast at Park Farm is just about visible to the right-hand side of the view and the dock cranes are also visible on the horizon.</p>	Users of Ransom Road (drivers and pedestrians)	YEAR 1 (winter): The nature of the existing view will change with the open arable field on the settlement edge replaced with housing, streets and associated landscaping which will be visible in the foreground. The buildings will be softened by planting, which will be immature at year 1. Development will obscure existing views out to the surrounding landscape.	HIGH ADVERSE	SUBSTANTIAL-MAJOR
	Residents of new development at Ransom Road			
	Value: MEDIUM-LOW	YEAR 15 (summer): The view will change from settlement edge to residential. Over time the design of the development will be softened by trees and planting. The nature of the change would not be entirely out of context with the surrounding development.	MEDIUM ADVERSE	MODERATE-SUBSTANTIAL
	Susceptibility: HIGH			
	Overall Sensitivity: MEDIUM-HIGH			
Embedded mitigation				

View 15 (Winter/Summer) – view looking west across the Site from Footpath 12 to Park Farm and beyond

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>The existing view is of an agricultural field bounded on two sides by development (east and south). The existing boundary of Conway Close forms and abrupt settlement edge. More isolated dwellings including Whitehouse Cottages and Park Farm lie along Gulpher Road to the north</p> <p>The view is a relatively short one with land falling away to the west. The backdrop is however of a well treed landscape with a mix of clusters of dwellings/farmsteads.</p>	<p>Users of the PRoW</p> <p>Users of Ferry Road (drivers and pedestrians)</p> <p>Residents of Ferry Road/Conway Close</p>	<p>YEAR 1 (winter):</p> <p>The nature of the existing view will change with the open arable field on the settlement edge replaced with housing, streets and associated landscaping which will be visible in the foreground along the length of the footpath route. The buildings will be softened by planting, which will be immature at year 1. Development will obscure existing views out to the surrounding landscape.</p>	HIGH ADVERSE	SUBSTANTIAL-MAJOR
	<p>Value: MEDIUM-LOW</p> <p>Susceptibility: HIGH</p> <p>Overall Sensitivity: MEDIUM-HIGH</p>	<p>YEAR 15 (summer):</p> <p>The context of the footpath route will change from settlement edge to residential. Over time the design of the development will be softened by trees and planting. The nature of the change would not be entirely out of context with the surrounding development.</p>	MEDIUM ADVERSE	MODERATE-SUBSTANTIAL
Embedded mitigation	Native tree and hedgerow boundary planting together with strategic planting within the Site.			

View 16 (Summer) – view north from Ferry Road

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>This view is from Ferry Road looking north towards the site.</p> <p>The bungalows on the western side of Ferry Road are dominant on the left-hand side of the Road, and post war 2 storey properties are present on the eastern side.</p> <p>The Whitehouse Cottages are visible behind the boundary fence to the bungalows.</p> <p>The eastern most edge of the site is partially visible.</p>	Road users (pedestrians and drivers)	<p>YEAR 1 (winter):</p> <p>The development will be mostly hidden from view by the bungalows on the western side of Ferry Road. A positive edge of the proposed development, including drives, buildings and tree planting will be seen in the continuation of the existing building line created by the bungalows, against a backdrop of area of open space to the north. The existing view is urban in nature and the proposed development would not be entirely out of context with the surrounding development.</p>	LOW ADVERSE	MINOR
	Value: MEDIUM-LOW	<p>YEAR 15 (summer):</p> <p>Over time the design of the development will be softened by trees and planting. The nature of the change would not be entirely out of context with the surrounding development.</p>	LOW ADVERSE	MINOR
	Susceptibility: MEDIUM			
<p>Overall Sensitivity: MEDIUM</p>				
Embedded mitigation	Limiting building height to a maximum of two storeys.			

View 17 (Summer) – view east from Gulpher Road near The Grove

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>This view was taken northeast from Gulpher Road near The Grove.</p> <p>The existing view is of undulating agricultural fields dotted with trees and delineated by hedgerows.</p> <p>Gulpher Cottages are to the left and the ground sloping down to Deben Estuary in the distance is seen immediately to the right. The central point is dominated by a small copse and to the right-hand side of the ground slopes up to Laurel Farm. 7-10 Gulpher Road are also visible and the site is to the far right, alongside urban development on Ferry Road and behind tree coverage.</p>	Road users (pedestrians and drivers)	YEAR 1 (winter): Minor change. Development is unlikely to be discernible. Any glimpses will be seen at distance, behind the existing tree coverage and in the context of existing development.	LOW ADVERSE	MINOR
	Value: HIGH	YEAR 15 (summer): By Year 15 the development will be bedded in and the associated strategic planting and open space will be well established softening the form of the development and locally increasing the level of vegetation cover. Tree planting around the northern and western boundaries will help to integrate the development into the landscape and settlement edge, further enhancing the character of the area. The nature of the change would be very minor and would not be out of context with the surrounding development.	LOW ADVERSE	MINOR
	Susceptibility: MEDIUM			
	Overall Sensitivity: MEDIUM			
Embedded mitigation	Undeveloped open space proposed to the northwest corner of the Site with native tree and hedgerow boundary planting together with strategic planting within the Site.			

View 18 (Summer) – view south from Gulpher Road near The Grove

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>This view was taken southeast from Gulpher Road near The Grove.</p> <p>The view is dominated by a mature copse of trees (The Grove), to the right-hand side of which the under Construction north of Candlet Road development can be seen.</p> <p>Development on Hyem's Lane is discernible and the site is to the left of the view, alongside urban development on Ferry Road and positioned behind existing tree coverage.</p>	Road users (pedestrians and drivers)	YEAR 1 (winter): Minor change. Development is unlikely to be discernible. Any glimpses will be seen at distance, behind the existing tree coverage and in the context of existing development.	LOW ADVERSE	MINOR
	Value: MEDIUM-LOW	YEAR 15 (summer): By Year 15 the development will be bedded in and the associated strategic planting and open space will be well established softening the form of the development and locally increasing the level of vegetation cover. Tree planting around the northern and western boundaries will help to integrate the development into the landscape and settlement edge, further enhancing the character of the area. The nature of the change would be very minor and would not be out of context with the surrounding development.	LOW ADVERSE	MINOR
	Susceptibility: MEDIUM			
	Overall Sensitivity: MEDIUM			
Embedded mitigation	Undeveloped open space proposed to the northwest corner of the Site with native tree and hedgerow boundary planting together with strategic planting within the Site.			

View 19 (Summer) – view south-east from Gulpher Road near Gulpher Farm

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>View south-east from Gulpher Road near Gulpher Farm.</p> <p>Gulpher Road is a strong visual element in this view. An agricultural field adjacent to the road is to the forefront of the view, beyond which are residential properties on Gulpher Road (Gulpher Cottages).</p> <p>The development site is hidden behind existing tree coverage.</p>	Road users (pedestrians and drivers)	YEAR 1 (winter): Minor change. Development is unlikely to be discernible. Any glimpses will be seen at distance, behind the existing tree coverage and part of the existing settlement edge.	LOW ADVERSE	MINOR
	Value: MEDIUM-LOW	YEAR 15 (summer): By Year 15 the development will be bedded in and the associated strategic planting and open space will be well established softening the form of the development and locally increasing the level of vegetation cover. Tree planting around the northern and western boundaries will help to integrate the development into the landscape and settlement edge, further enhancing the character of the area. The nature of the change would be very minor and would not be out of context with the surrounding development.	LOW ADVERSE	MINOR
	Susceptibility: MEDIUM			
	Overall Sensitivity: MEDIUM			
Embedded mitigation	Undeveloped open space proposed to the northwest corner of the Site with native tree and hedgerow boundary planting together with strategic planting within the Site.			

View 20 (Summer) – view southwest from Ferry Road at Felixstowe Ferry Golf Course

Description of existing view	Receptors	Description of change	Magnitude, nature of change	Significance
<p>This view is from the road leading to properties adjacent to the Martello Tower at Felixstowe Ferry. It looks across the golf course on the Coastal Levels, with the rising ground of the Deben Valley slopes beyond. The existing settlement of Felixstowe is visible on the ridge and upper valley slopes to the south west with agricultural and residential development along Marsh Lane (including the barns at Laurel Farm and Fellet House) prominent on the skyline to the west.</p> <p>The new development at Ferry Road (up to three storeys) is just discernible on the ridge beyond intervening vegetation. The Site is not visible from this viewpoint, it sitting behind the new development east of Ferry Road.</p> <p>The viewpoint is located within the Suffolk Coast and Heaths AONB.</p>	Users of Ferry Road Users of the Golf Course	YEAR 1 (winter): No change. Development is unlikely to be discernible. Any glimpses will be seen at distance and in the context of existing development.	NO CHANGE	NO CHANGE
	Residential Properties at Felixstowe Ferry	YEAR 15 (summer): No change. Development is unlikely to be discernible. Any glimpses will be seen at distance and in the context of existing development.	NO CHANGE	NO CHANGE
	Value: HIGH			
	Susceptibility: HIGH			
Overall Sensitivity: HIGH				
Embedded mitigation	Limiting building height to a maximum of two storeys. Large area of undeveloped open space proposed to the northeast corner of the Site with native tree and hedgerow boundary planting together with strategic planting within the Site.			

Cumulative effects

- 7.178 This section considers the cumulative landscape effects arising from the proposed development, alongside Laureate Fields and the North Felixstowe Garden Neighbourhood. The location of these developments in relation to the Site are annotated on the Type I Visualisations.
- 7.179 It is assumed that individually the schemes should all allow for new green space and planting, particularly to the northern edge. This would form a continuous landscape corridor, such that new soft boundaries will provide a much better interface between the edge of the settlement and the countryside than presently exists.
- 7.180 This landscape framework should preserve the existing views which can be gained from Gulpher Road near The Grove (surrounding VP 17) onto the Deben Estuary and the Suffolk Coast & Heaths AONB through the retention of this visual corridor, avoiding landscaping and tree planting where it would impede this view.
- 7.181 The proposed development is relatively small in relation to the approved developments and allocations, and it is not in a prominent location that would fundamentally change the character of the resulting settlement edge. The overall feeling of the settlement, if development of all the sites took place, would still be that of a mainly modern settlement, interspaced with some older properties, and sitting within the wider agricultural landscape.
- 7.182 Overall, the development of all the schemes together would not have a significant or unacceptable effect on the landscape character areas, the natural beauty and special qualities of the Suffolk Coast & Heaths AONB or setting and character of the existing settlement.
- 7.183 The sites can be seen from surrounding viewpoints in combination, however it is assumed that the overall development will be integrated by a robust landscape framework to the north. Breaks in development will also be incorporated which will mirror the existing pattern of development and integrate it into the surrounding setting, minimising impact upon the surrounding views.
- 7.184 The development is not in a prominent location which would increase its visibility in relation to the surrounding sites. As such the development will appear in context it will not be harmful in relation to the existing landscape character areas or the natural beauty and special qualities of the Suffolk Coast & Heaths AONB.

Mitigation and monitoring

(a) Scope

- 7.185 As described in this Assessment, the proposed development has been carefully designed to incorporate a variety of measures to avoid or reduce landscape and visual effects.
- 7.186 This section identifies the additional measures required to ensure that landscape and visual effects are considered as part of the detailed design, construction / implementation and management of the proposed development. Such measures can be agreed as part of the reserved matters and secured by planning conditions where necessary.

(b) Primary mitigation

Layout, scale, design, appearance and landscape

- 7.187 As an outline planning application, the detailed layout, scale, appearance and landscape will be agreed as reserved matters. The key considerations are set out below.
- 7.188 The Concept Plan establishes the principles of the proposed development against which the landscape and visual effects have been assessed. The detailed design of the Site should be carefully considered and landscape led, ensuring that the proposed primary / embedded mitigation is incorporated into the final layout. This includes:

Planting Strategy:

- Retention of the majority of the existing boundary vegetation. Any vegetation removed to be replaced with planting of a sufficient size / impact.
- New strategic planting including native trees to reinforce the existing vegetation to the Site boundaries. Tree species should reflect the local character of the area.
- Existing hedgerow along northern boundary retained and enhanced with new native tree planting to filter views and integrate development.
- Ensure planting of large tree species such that at Year 15 skyline effects of built form are minimised e.g. in views from the west planting should aim to break up massing of the proposed development and screen the bulkier massing within it.
- Proposed planting of large species trees to be secured at reserved matters stage using appropriate offset distances from nearest proposed foundations and consideration of root barriers when space constraints would limit selection of low and medium water demand species.

Open Space Strategy:

- The creation of a small area of open space on the junction of Gulpher Road and Ferry Road.
- The northeast corner is the highest and most susceptible to intervisibility with the AONB, hence it is the most appropriate area to remain undeveloped. There is potential to reshape the space to more accurately match the existing landscape pattern with linear open space along Gulper Road and Ferry Road, providing a more organically shaped area that wraps around the eastern and northern site edges and visually connects to the landscape beyond.

Urban Design Strategy:

- A maximum building height of two storeys.
- Set back of development from Gulpher Road and Ferry Road with detached dwellings to form a lower density and landscape dominated settlement edge.
- Compose the roofscape along the northern perimeter / Gulper Lane to provide a progression of scale with potential for 1.5 storey buildings, particularly to the north west adjoining Park Farm.
- Break up the massing of the built form such that there are visual breaks on the skyline when viewed from the west.
- Car parking along northern perimeter to be minimised. Frontage development is preferred along this edge to avoid rear garden clutter and associated paraphernalia.

Building Design and Materials:

- The detailed design and building materials should be informed by an analysis of the Site and character of Old Felixstowe. The use of traditional architecture and design is considered appropriate with the use of local materials such as brick, render and weatherboard important to assist in integrating the buildings into the landscape and maintain a sense of place.
- The colour of the buildings facing towards the AONB should be carefully considered. Reference should be made to the 'Guidance on the Selection and Use of Colour in Development for the Suffolk Coast & Heaths AONB'.

Levels

- 7.189 External and finished floor levels should follow the existing contours of the site. Significant changes in level should be avoided. The design of SuDS should be sympathetic and integral to the design of the open space and meet ecological and landscape objectives.

Lighting

- 7.190 While lighting is present on the established residential areas to the south of the Site, due to the sensitivity of the surrounding landscape, the lighting strategy should be carefully designed in order to ensure that night time effects such as light pollution and sky glow are kept to a minimum. Careful consideration should be given to the location of lighting, with lighting on the countryside edges (particularly to the north) avoided wherever possible. The light source and the type of luminaires should comply with current lighting Codes of Practice.

Drainage and services

- 7.191 The location of proposed drainage and services should be carefully considered and fully coordinated with the landscape strategy, the existing trees to be retained and proposed planting.

Tree retention and protection

- 7.192 To ensure that important trees and hedgerows around the boundaries of the site are retained an Arboricultural Impact Assessment, Method Statement and Tree Protection Plan should be prepared as part of the reserved matters submission and adhered to at all stages of the development.
- 7.193 In accordance with BS 5837: 2012 'Trees in Relation to Design, Demolition and Construction - Recommendations' the report will confirm the vegetation to be retained and removed; the details any tree works required; the location and specification of barriers / ground protection; the details of any specialist construction works required; and site supervision and monitoring.

Detailed soft landscaping

- 7.194 The landscape strategy should form an important aspect of the layout with a detailed landscape scheme to be submitted with the reserved matters planning application. The landscape scheme should include:
- Existing vegetation to be retained (in accordance with the AIA/TPP); and
 - Details of all proposed soft landscape (trees, hedges, shrubs, seeding etc.) including species, planting density and stock size. The size of plant stock should provide immediate impact in key areas such as the northern and western boundaries, while generally using stock of more modest size to deliver a green framework in the short-term.
 - A specification setting out the standards for the implementation of soft landscape, including details of soil preparation / cultivation, planting and seeding, and the initial maintenance required to ensure their successful establishment; and a programme setting out the time frames for implementation.

- 7.195 Native planting (using species appropriate to the local area) should be used around the Site boundaries. A mix of ornamental and native trees are appropriate within the urban area.

(c) Secondary mitigation and monitoring

Construction, implementation

- 7.196 A number of measures are advised during the construction of the Site and implementation of the landscape scheme to ensure that the proposals are carried out in accordance with the approved details.
- 7.197 In accordance with the Arboricultural Method Statement, at suitable intervals during the construction phase and post completion, the protection and condition of existing vegetation should be monitored by a qualified arboriculturist.
- 7.198 Proposed planting should be implemented in conjunction with the substantial completion of each phase. To minimise the time that adverse visual effects are experienced, the enhancement and replacement of strategic vegetation around the boundary of the Site including the open space should be established as early as possible, i.e. in the first planting season after the completion of the development. All soft landscape should be implemented in accordance with the detailed landscape drawings and implementation programme, with works monitored by an appropriately qualified landscape professional.

Management

- 7.199 To ensure the long-term management of the site, the open space and boundaries should be conveyed to a single management body (management company or similar). A Landscape and Ecological Management Plan (LEMP) should be prepared setting out the measures required to ensure the sustainable maintenance of all strategic vegetation and ensure it is retained in suitable condition in perpetuity. The management plan should include replacement vegetation as may be required to maintain the landscape framework.
- 7.200 The majority of planting is likely to be located in areas which will be conveyed to private residents. A standard landscape condition should ensure that these areas are retained for at least a minimum period of five years. This can be supported by guidance on general landscape maintenance included within the information provided at the point of purchase.

(d) Potential mitigation to be embedded into North Felixstowe Garden Neighbourhood

7.201 This section considers recommendations to be embedded into the detailed design of the North Felixstowe Garden Neighbourhood in order to minimise landscape and visual impacts. These mitigation measures include the following:

- Northern extent to remain undeveloped in order to retain views of the estuary and AONB. Furthermore, the proposed landscape framework along the north edge of the North Felixstowe Garden Neighbourhood should preserve the existing views which can be gained from Gulpher Road near The Grove (surrounding VP 17) onto Deben Estuary through the retention of this visual corridor, avoiding landscaping and tree planting where it would impede this view.
- Recommend locally characterising canopy trees along Hyems Lane to be retained and incorporated into overall pattern of Green Infrastructure.
- A maximum building height of two storeys.
- Compose the roofscape along the northern perimeter to provide a progression of scale with 1.5 and/or single storey buildings “stepping down” to the north.
- Break up the massing of the built form such that there are visual breaks on the skyline when viewed from the west.
- Buildings to be set back from edge with detached properties to provide a lower density and landscape dominated settlement edge.
- Car parking along northern perimeter to be minimised and frontage development is preferred along this edge to avoid rear garden clutter and associated paraphernalia.

Summary and conclusion

- 7.202 This Landscape and Visual Impact Assessment has been prepared by Southern Ecological Solutions (SES) on behalf of Generator Optima (Ferry Road II) Ltd for an outline application for up to 150 houses, together with associated new access road, parking and public open space on land to the north of Conway Close and Swallow Close, Old Felixstowe, Suffolk (the 'Site').
- 7.203 Due to the relationship with the adjacent Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) and the position of the Site being on high land to the south of this designated area, a Landscape and Visual Impact Assessment has been prepared as part of the Environmental Statement to be submitted with the planning application to demonstrate how potential changes to the landscape resource have been addressed and to identify any residual landscape and visual effects. This assessment also addresses the cumulative effects of the development alongside other proposals as identified in the Scoping Report. As subsequently agreed with the Landscape Officer this comprised Laureate Fields and the North Felixstowe Garden Neighbourhood.
- 7.204 The Site was originally allocated for housing in the now superseded Local Plan (Felixstowe Peninsula Area Action Plan, January 2017). The allocation has been carried forward within the Suffolk Coastal Local Plan (Adopted September 2020) as an Area Specific Policy (SCLP12.4 Land north of Conway Close and Swallow Close) together with the comprehensive large-scale mixed use allocation of the North Felixstowe Garden Neighbourhood (SCLP12.3) to the west.

Context

- 7.205 Lying on high ground between the Orwell and Deben estuaries, Felixstowe is an important seaside town, with the nationally significant Port of Felixstowe to the south. Both the port and its associated industries and tourism are important to the economy of the area.
- 7.206 The Site (approximately 3.83ha) is located on the northern edge of the town in an area known as 'Old Felixstowe' and directly adjoins existing development to the south and east on an elevated plateau. To the north and west lies open countryside.
- 7.207 Beyond Gulpher Road the land rises slightly to a ridge at Laurel Farm (the AONB boundary) before falling away into the Deben Estuary and Felixstowe Marshes. Within the countryside to the north of the Site, isolated farmsteads are seen throughout the higher land with Felixstowe Ferry to the north east at the mouth of the River Deben.

- 7.208 The urban area is characterised by mid- to late-20th Century residential development (one and two storeys in height) interspersed with late 19th Century housing. The town of Old Felixstowe appears fairly densely laid out with a range of building styles, sizes and age. At present the existing settlement edge is harsh, the existing dwellings along Conway Close, Swallow Close and Upperhill Drive directly abutting the agricultural landscape to the north, with a varied mix of suburban fencing and front/rear gardens dominating the view from the north.
- 7.209 New development (under construction) to the east of Ferry Road (Laureate Fields) is relatively tall in comparison to the single storey dwellings to the west.

Site and proposed development

- 7.210 The Site (approximately 3.83ha) is located to the north of the town of Old Felixstowe. It currently comprises a small arable field adjacent to Park Farm Cottages and further arable land to the west. To the south, the Site is enclosed by residential development and PRoW 12 which runs along the southern boundary. To the north, a good quality existing hedgerow separates the Site from Gulpher Road (designated a Quiet Lane and promoted cycle route) with the AONB beyond.
- 7.211 Based on a detailed analysis of the site and its opportunities and constraints (including the topography, existing vegetation, surrounding development and the adjoining footpaths / open space), the proposed residential development has been carefully designed to complement the prevailing character and pattern of the town, providing a variety and mix of dwellings fronting onto Ferry Road behind a strong boundary.
- 7.212 The existing hedgerow to the north and north east of the Site will be retained, whilst additional hedgerows and hedgerow trees will be provided to the western and eastern boundaries. The footpath to the south of the Site will become more enclosed, but will provide a pleasant, sheltered route to and from Ferry Road maintaining the link to the surrounding countryside.

Summary of landscape effects

- 7.213 The principal changes will occur within the Site and its immediately surrounding area, particularly following the completion of the development. The character of the Site will permanently change from an existing arable field to a residential area comprising buildings, streets and open space. The landscape effects at the Site level are subsequently assessed as Moderate Adverse at Year 1 reducing to Minor Adverse by Year 15 once the vegetation framework has established. While the change will be noticeable, the development would not be uncharacteristic when set within the surrounding context.
- 7.214 In respect of the settlement of Felixstowe (LCA E3.) the change in character is assessed as Minor Adverse at Year 1 reducing to Negligible by Year 15. In respect of the Deben Valley (LCA J5.) the change in character is assessed as Low Adverse at Year 1 reducing to Minor / Negligible by Year 15.

- 7.215 Development would not result in a direct loss or impact upon the Natural Beauty and Special Qualities of the Suffolk Coast & Heaths AONB. There would be loss of a small arable field which lies immediately adjacent to the existing settlement edge and extend development up to Gulpher Road (a Quiet Lane), resulting in a minor reduction in the physical buffer between the town of Felixstowe and the AONB at this point. The effects of the proposed development will decrease over time as strategic vegetation (particularly along the northern boundary), street trees and planting matures complementing the built form and locally increasing the level of vegetation cover. While the development would still be a discernible this would be a minor change with a very minor effect upon the natural beauty and special qualities of the Suffolk Coast and Heaths AONB.
- 7.216 An assessment of the development impact upon townscape elements has also been undertaken with the magnitude of change ranging from Low Neutral to Beneficial. Subject to detailed design, the layout, built form (height, scale, massing, building style and materials) and landscaping will complement the surrounding settlement and whilst still a noticeable and apparent change at the site level, the development would not be uncharacteristic within the surrounding context. With an appropriate detailed landscape scheme, the Site provides the opportunity to locally increase vegetation cover and establish a softer settlement edge integrating both existing and proposed development into the landscape. The proposed building heights match the existing ones, the development is well connected into the existing movement framework and there is an opportunity to design a development with a distinctive character and range of attractive spaces which will complement the surroundings and enhance the edge of town location.

Summary of visual effects

- 7.217 From the town and surrounding countryside, the site is relatively well contained by the local topography, existing vegetation and surrounding development. Visual effects will therefore occur within a relatively limited area, broadly confined to the adjoining residential properties, roads and footpaths (predominantly within 0.5km but extending to 1km and beyond).
- 7.218 Due to the proximity of the development the resulting visual effect on existing properties and public right of way to the south is assessed as Major-Substantial Adverse at Year 1, reducing to Moderate-Substantial Adverse by Year 15 as strategic vegetation establishes.
- 7.219 From the north and east where views are already dominated by the existing settlement edge, the visual effect on existing properties and road users varies from Moderate to Minor Adverse at Year 1 to Moderate, Minor or Negligible Adverse or Neutral at Year 15.

- 7.220 From the wider landscape to the west, the visual effects are dependent on distance. From the public footpaths immediately to the west (PRoW 12, 13 and 16 including Hyem's Lane) the lack of vegetation along the site boundary allows open views into the site which is set in front of the existing abrupt settlement edge. The visual effect is therefore assessed as Substantial to Moderate Adverse at Year 1 reducing to Moderate Adverse to Minor Neutral by Year 15.
- 7.221 Further to the west as the land falls into a shallow valley from PRoW 15, 17 and 18 and Gulpher Road a combination of the topography and vegetation around Park Farm limits views towards the site. The effect at Year 1 is subsequently assessed as Moderate to Minor Adverse, decreasing to Minor Neutral or Negligible over time.
- 7.222 Views south-east from Gulpher Road near Gulpher Farm and the Grove will suffer a minor change in visual impact, as development is unlikely to be discernible and any glimpses will be seen at distance, behind the existing tree coverage and in the context of existing development. The effect at Year 1 is subsequently assessed as Low Adverse, decreasing to Minor or Negligible over time.
- 7.223 The views from the landscape to the north are contained by the ridge around Laurel Farm. The rising ground allows views south back towards the settlement edge, with existing buildings set amongst a reasonable framework of trees. From PRoW 5 and properties along Marsh Lane (including the boundary of the AONB), the development will be partially visible set between the clusters of existing properties on Gulpher Road and the established settlement edge. While there will be an increase in the extent of development, visual effects will be mitigated by the setting back of development and the creation of open space establishing an indented settlement edge. Existing vegetation will be enhanced by new strategic native tree planting. The visual effect at Year 1 is therefore assessed as Moderate-Minor Adverse reducing to Negligible at Year 15.
- 7.224 From within the Deben Valley and Coastal Levels, the rising ground of the valley slopes provides the backdrop to open and expansive views. On the basis that the height will be restricted to a maximum of two storeys no change is anticipated to views from the core of the AONB and Deben Valley. Any glimpses will be seen at distance and in the in the context of existing development.

Summary of cumulative effects

- 7.225 In relation to the cumulative landscape effects arising from the proposed development, it is assumed that individually the schemes should all allow for new green space and planting, particularly to the northern edge. This would form a continuous landscape corridor, such that new soft settlement edges will provide a much better interface between the edge of the settlement and the countryside than presently exists.

- 7.226 This landscape framework should preserve the existing views which can be gained from Gulpher Road near The Grove (surrounding VP 17) onto Deben Estuary and the Coast & Heaths AONB through the retention of this visual corridor, avoiding landscaping and tree planting where it would impede this view.
- 7.227 The proposed development is relatively small in relation to the approved developments and allocations and it is not in a prominent locations that would fundamentally change the character of the resulting settlement edge. The overall feeling of the settlement, if development of all the sites took place, would still be that of a mainly modern settlement, interspaced with some older properties, and sitting within the wider agricultural landscape.
- 7.228 Overall, the development of all the schemes together would not have a significant or unacceptable effect on the landscape character areas, the natural beauty and special qualities of the Suffolk Coast & Heaths AONB or setting and character of the existing settlement.
- 7.229 The sites can be seen from surrounding viewpoints in combination, however it is assumed that the overall development will be screened by a robust landscape framework to the north and breaks in development will also be incorporated which will mirror the existing pattern of development and integrate it into the surrounding setting, minimising impact upon the surrounding views.
- 7.230 The development is not in a prominent location which would increase its visibility in relation to the surrounding sites. As such the development will appear in context it will not be harmful in relation to the existing landscape character areas or the natural beauty and special qualities of the Suffolk Coast & Heaths AONB.

Mitigation and monitoring

- 7.231 Mitigation measures identify the additional measures required to ensure that landscape and visual effects are considered as part of the detailed design, construction / implementation and management of the proposed development, including the reserved matters application.
- 7.232 These have included recommendations around planting, and the proposed landscape framework along the north edge of the North Felixstowe Garden Neighbourhood, which should preserve the existing views which can be gained from Gulpher Road near The Grove (surrounding VP 17) onto Deben Estuary through the retention of this visual corridor, avoiding landscaping and tree planting where it would impede this view.
- 7.233 Mitigation measures have also included retaining the northeast corner as an undeveloped area, given it's the area within the development most susceptible to intervisibility with AONB.

Appendices

- Appendix 7.1 Sources of information
- Appendix 7.2 Methodology
- Appendix 7.3 Area-specific policies for Felixstowe
- Appendix 7.4 Scoping opinion
- Appendix 7.5 E-mail from Strategic Landscape Advisor, East Suffolk Council
- Appendix 7.6 Figures

8. Biodiversity and Ecology

Purpose

- 8.1 This Environmental Statement: Biodiversity and Ecology Chapter has been prepared by Sweco UK Ltd. for Generator Optima (Ferry Road) Ltd. and relates to the proposed residential development at land off Ferry Road, Felixstowe, Suffolk, IP11 9RJ (grid reference: TM 3132 3637) (hereafter 'the site') (Figure 65206261-SWE-ZZ-XX-DR-J-0001) for which outline planning permission is being sought.
- 8.2 Proposals are to construct 150 new residential units with associated access and landscaping (hereafter 'the development') on a 3.8 ha area of land which is currently in arable use. The indicative scheme for the outline application is shown on JCN Design & Planning drawing no. GN003-CPT-001, rev. 00.
- 8.3 The purpose of this report is to:
- Establish baseline ecological conditions at the site;
 - Identify important ecological features within the site and the wider survey area;
 - Assess potential impacts and effects upon these important ecological features;
 - Detail avoidance measures to be incorporated through design evolution as an intrinsic part of the development;
 - Detail any ecological mitigation measures to be implemented during the site clearance and construction phase;
 - Identify any residual ecological effects on important ecological features after avoidance and mitigation measures have been considered;
 - Identify cumulative impacts, in combination with nearby developments, on these important ecological features;
 - Identify any compensation measures required to offset residual effects;
 - Provide recommendations for how mitigation and compensation measures may be secured and monitored through the planning system;
 - Identify the need for a Habitats Regulation Assessment or report to inform an Appropriate Assessment by the competent authority;
 - Identify opportunities for Biodiversity Net Gain to be delivered through the development;
 - Identify opportunities for other ecological enhancement measures which could be delivered through the development; and
 - Provide sufficient information to determine whether the project accords with relevant nature conservation policies and legislation and, where appropriate, to allow conditions or obligations to be proposed by the relevant authority.

Ecological background

- 8.4 An initial Preliminary Ecological Appraisal (PEA) survey was undertaken by Sweco UK Ltd in November 2020 (Sweco 2021). This included a desk based study, a JNCC Phase I Habitat Survey, and protected species scoping survey. The PEA Report (66201978-SWE-ZZ-XX-RP-J-0001) recommended further wintering bird surveys, which were undertaken by Sweco UK Ltd. between 2020 and 2021. It identified numerous ecological receptors which should be given consideration in the planning process.
- 8.5 Due to the lapse of time since the original PEA and its use of the now phased out JNCC Phase I methodology, as opposed to the new UK Habitat Classification methodology (the latter being necessary to inform Biodiversity Metric calculations required to deliver Biodiversity Net Gain as requested by East Suffolk Council), the PEA survey was repeated in June 2022.
- 8.6 Discussions with the client at this time determined that the previous wintering bird survey results were still valid, but that summer breeding bird surveys should be undertaken, following receipt of a scoping opinion from East Suffolk Council (Perkin, 2022).
- 8.7 The methodology and results of these surveys are detailed herein.

Application background

- 8.8 An outline planning application was submitted to the East Suffolk Council by JCN Design & Planning on behalf of Generator Optima (Ferry Road) Ltd. in June 2021.
- 8.9 An Environmental Impact Assessment (EIA) Screening Opinion was given by East Suffolk Council on the 9th July 2021 which summarised that, although the proposed development of 150 residential units does not qualify as a Schedule 1 or Schedule 2 development under the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, the proposal should be considered in combination with neighbouring developments. These include:
- North Felixstowe Garden Neighbourhood (site is allocated for 2,000 dwellings, primary school, recreation, and community facilities under Local Plan Policy: SCLP 12.3).
 - Outline planning permission has been granted for up to 560 dwellings, Local Community Centre, a 60 Bedroom extra Care Home and 50 Assisted Living Units, two small Business Units, and open space provision with associated Infrastructure granted (planning reference: DC/15/1128/OUT);
 - Laureate Fields, Ferry Road (195 residential units). Application references: DC/13/3069/OUT; DC/18/1993/FUL; and
 - Land north of Walton High Street (385 residential units). Application references: DC/16/2778/OUT
- 8.10 The screening opinion therefore concluded that an EIA for the development should be undertaken for this development.
- 8.11 An EIA Scoping Report by JCN Design & Planning (JCN Design & Planning, 2021) stated that topics to be 'Scoped In' would include Landscape & Visual Effects; Transport & Access; and Biodiversity & Ecology. A Scoping Opinion response from East Suffolk Council (Perkin, 2022) dated 28th January 2022 concurred with this scoping proposal and added that the above topics should consider cumulative impacts in combination with the aforementioned nearby developments.

- 8.12 With regard to Biodiversity & Ecology, the Scoping Opinion response specified the need to consider the following:
- Potential impacts and effects upon statutory and non-statutory designated sites;
 - Impacts and effects upon protected species;
 - Impacts and effects upon priority species and habitats;
 - Identification of Biodiversity Net Gain and Ecological Enhancement opportunities; and
 - Information to inform a Habitats Regulations Assessment of nearby internationally designated site(s).
- 8.13 The requirements of the East Suffolk Council for the Biodiversity & Ecology Chapter of the EIA have been taken into consideration and are addressed within this report.

Legislation and planning policy

(a) Background

- 8.14 This section summaries legislation and planning policy of relevant to the site and development.
- 8.15 The reader is referred to the original legislation for definitive interpretation. Detailed information on how each taxon is legally protected is given in Appendix 8.1.

(b) Legislation

The Conservation of Habitats and Species Regulations 2017

- 8.16 The Conservation of Habitats and Species Regulations 2017 (as amended) (hereafter 'Habitat Regulations 2017') transposes European Union Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora into national law. These regulations provide for the designation and protection of 'European Sites', the protection of 'European Protected Species' and the adaptation of planning controls for the protection of such sites and species. 'European Protected Species' are listed on Schedule 2 of the regulations. Under the regulations, public bodies have a duty in exercising their functions to have regard to Directive 92/43/EEC.
- 8.17 Broadly speaking, the Habitat Regulations 2017 makes it an offence for any person to:
- deliberately capture, injure or kill any wild animal of a European protected species;
 - deliberately disturb wild animals of any such species;
 - deliberately take or destroy the eggs of such an animal; or
 - damage or destroy a breeding site or resting place of such an animal. Disturbance of animals includes any disturbance which is likely:
 - to impair their ability survive, to breed or reproduce, or to rear or nurture their young; or in the case of animals of a hibernating or migratory species, to hibernate or migrate; and
 - or that may affect significantly the local distribution or abundance of the species to which they belong.
- 8.18 Furthermore, it is an offence for any person:
- to be in possession of, or to control;
 - to transport;
 - to sell or exchange; or
 - to offer for sale or exchange any European protected species.

- 8.19 In the Conservation of Habitats and Species Regulations 2017 (as amended), Regulations 63 (assessment of implications for European sites and European offshore marine sites) and 64 (considerations of overriding public interest) restrict the granting of planning permission for development which is likely to adversely affect the integrity a European site unless there are imperative reasons of overriding public interest. The regulations require that the competent authority (in this case the local authority considering the planning application) complete an ‘appropriate assessment’, including consultation with the relevant statutory nature conservation organisation (in this instance Natural England) and the general public.

The Wildlife and Countryside Act 1981

- 8.20 The Wildlife and Countryside Act 1981 (as amended) (hereafter ‘WCA 1981’) provides protection to wild fauna (Schedule 5), flora, and fungi (Schedule 8) as well as to Sites of Special Scientific Interest (SSSI). The WCA 1981 also provides legislation regarding control of Invasive Non-Native Species (INNS) (Schedule 9).
- 8.21 With respect to protected fauna, Section 9 of the WCA 1981 broadly makes it an offence for any person to:
- Intentionally kill, injure or take any wild animal listed in schedule 5;
 - Possess or control any live or dead wild animal included in schedule 5;
 - Intentionally or recklessly damage or destroy any structure or place which any wild animal specified in Schedule 5 uses for shelter or protection;
 - Intentionally or recklessly disturb any such animal while it is occupying a structure or place which it uses for shelter or protection; or
 - Intentionally or recklessly obstruct access to any structure or place which any such animal uses for shelter or protection.

The Protection of Badgers Act 1992

- 8.22 The Protection of Badgers Act 1992 makes it an offence for any person to:
- Wilfully kill, injure, take a badger (*Meles meles*);
 - Possess or control a badger either dead or alive;
 - Cruelly ill-treat a badger or dig for a badger; or
 - Damage, destroy, or obstruct access to a badger sett or disturb a badger while it is occupying a sett.

The Natural Environment and Rural Communities Act 2006

- 8.23 The Natural Environment and Rural Communities (NERC) Act 2006 imposes an obligation on all public bodies, including local authorities under section 40(1) of the Act, which states: “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.” Section 41 requires the Secretary of State to work with Natural England to publish a list of habitats and species that are a priority for local authorities to take into account, for example when assessing planning applications.
- 8.24 This species list is published on Schedule 41 by Natural England (2013).

The Environment Act 2021

- 8.25 The Environment Act 2021 became law on 9 November 2021 and introduces a framework to improve and protect the natural environment, overseen by the newly created Office for Environmental Protection. The Act introduces new statutory requirements, including the duty for local authorities to create new local nature recovery strategies.
- 8.26 The Act also introduces a new mandatory requirement for developments to achieve measurable biodiversity net gain. A two-year transition period for this requirement is included in the Act, with provision for secondary legislation to set a date for the requirement to come into force. It is likely this will be late 2023 or later, so will not apply to this Project at this stage. Once in force, all planning permissions in England (subject to exemptions) must be granted subject to a new general pre-commencement condition that requires approval of a biodiversity gain plan. The planning authority would only approve the biodiversity gain plan if the biodiversity value attributable to a development exceeds the pre-development biodiversity value of the onsite habitat by 10%.
- 8.27 To determine biodiversity gain, Natural England’s biodiversity metric has been released in multiple versions over recent years as a calculator toolkit. This toolkit has developed with use, stakeholder engagement, and feedback, and is anticipated for release as a final version implemented within the Environment Bill upon coming into force. The final version of the metric to calculate biodiversity gain is expected to vary from the current 3.1 Biodiversity Metric version, as engagement and feedback is continued to be received and incorporated into future iterations of the biodiversity calculator.

(c) National planning policy

- 8.28 The National Planning Policy Framework 2021 (NPPF) sets out planning policy guidance to inform Local Plans set out by Local Planning Authorities. Paragraphs 174 to 182 address conservation and enhancement of the natural environment, habitat, and biodiversity.

- 8.29 Paragraphs 174 and 179 in particular emphasise the need for developments to contribute to the protection and enhancement of sites of biodiversity value; to identify, map, and safeguard local wildlife rich habitats and wider ecological networks; and to promote the conservation, restoration, and enhancement of priority habitats, ecological networks, and priority species. Priority habitats are those listed on Section 41 of the Natural Environment and Rural Communities Act 2006, which are considered Habitats of Principal Importance for the Conservation of Nature; priority species are those listed on Section 41 of the Natural Environment and Rural Communities Act 2006, which are considered Species of Principal Importance for the Conservation of Nature.
- 8.30 Paragraph 180 emphasises important principles local authorities should follow when determining planning applications. In particular, this paragraph emphasises the need for any application to ensure that the mitigation hierarchy for avoidance, mitigation, and compensation of significant harm to biodiversity is followed. It also sets out that loss of irreplaceable habitats is unacceptable in any planning application, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

(d) Local policy

East Suffolk Local Plan

- 8.31 The East Suffolk Council (2020a) - Suffolk Coastal Local Plan Section 10 addresses policies pertaining to the Natural Environment.
- 8.32 Policy SCLP10.1: Biodiversity and Geodiversity states that *“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’. All development should follow a hierarchy of seeking firstly to avoid impacts, 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. Adherence to the hierarchy should be demonstrated”*.
- 8.33 Policy SCLP10.1 goes on to state that proposals that will have a direct or indirect adverse impact on locally designated sites, priority habitats, or priority species will not be supported unless it can be demonstrated that benefits outweigh biodiversity loss.
- 8.34 The policy further states that developments should provide ecological enhancements and biodiversity net gain which is proportionate to the development.
- 8.35 Where proposals will adversely affect any site of special scientific interest or internationally designated site, the proposal will not normally be granted planning permission. Any development with potential to impact an internationally designated site will need to be supported by information to inform a Habitats Regulation Assessment.

East Suffolk Council Policies Map

- 8.36 The site is allocated within the East Suffolk Council (2020b) - Suffolk Coastal Local Plan policy map for housing (policy SCLP12.4). Therefore, there is an existing presumption within with the local plan that the site will be used for residential development.
- 8.37 A 143 ha area of land adjacent to the west of the site is also allocated for housing development under policy SCLP12.3, with a presumption for the creation of 2,000 residential units with community infrastructure and greenspace.

(e) Guidance and industry standards

- 8.38 The Office of The Deputy Prime Minister Circular 06/05 (ODPM, 2005) is a document published to provide guidance on application of law relating to planning and nature conservation in England. Natural England also provides standing advice relating to legally protected species in England.
- 8.39 Industry standards for competency required to carry out ecological surveys to establish baseline conditions are published by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2019). Common industry best practice standards for ecological report writing (CIEEM, 2017) and Ecological Impact Assessment are also published by CIEEM (CIEEM, 2018).
- 8.40 Guidance for designing and implementing ecological avoidance, mitigation, compensation and enhancement measures is presented in BS42020:2013 – Biodiversity (The British Standards Institution, 2013).

Methodology

(a) Technical approach

- 8.41 The surveys conducted to inform the ecology baseline of the site in respect to the proposed development include a desk study and a series of field surveys. These have been undertaken by experienced and qualified ecologists in accordance with current guidance.
- 8.42 The Impact Assessment of this report has been undertaken in accordance with CIEEM Guidelines for Ecological Impact Assessment (CIEEM, 2018), modified in accordance with JCN Design & Planning's EIA Scoping Report (JCN Planning & Design, 2021) approach to Environmental Impact Assessment.

(b) Personnel

- 8.43 This Environmental Statement Chapter was produced by Senior Ecologist Darren Storey MZool MSc ACIEEM, with input from Senior Ecologist Sophie Barrell MEcol (Hons) ACEEM. It was reviewed by Consultant Ecologist Leonora Hunt MSc and approved for issue by Principal Ecologist Joshua Stafford BSc (Hons) MRSB.
- 8.44 Surveyor names and qualifications are stated under each survey heading below.

(c) Scope of the assessment and zone of influence

- 8.45 The features considered for this assessment were designated sites, habitats and species of principal importance for the conservation of nature (e.g. priority habitats and species), and species protected by wildlife legislation.
- 8.46 The Zone of Influence (Zoi) is the area over which ecological features may be subject to change as a result of the proposed development and associated activities (CIEEM, 2018) The Zoi varies depending on the ecological feature concerned and can extend beyond the site boundary. Where possible, the Zoi will be determined using the results of professionally accredited or published scientific studies. Where such studies are not available, the Zoi will be determined using the professional judgement of a suitably experienced and qualified ecologist. This approach is in line with professional guidelines (CIEEM, 2018).

8.47 The ecological features considered in this assessment, and their respective Zones of Influence, are given in Table 8.1 below.

Table 8.1: ecological features and respective Zones of Influence.

Ecological feature	Zone of Influence
Internationally Designated Sites	13 km ^{1,2}
Nationally Designated Sites	5 km
Locally Designated Sites	2 km ³
Ancient Woodland	2 km
Priority Habitats	Site boundary only
Invertebrates	Site boundary only
Great Crested Newt (pond search)	500 m ⁴
Reptiles	Site boundary
Wintering Birds	Site boundary and adjacent habitat
Breeding Birds	Site boundary and adjacent habitat
Badger	30 m ⁵ (where accessible)
Roosting Bats	10 m
Foraging and Commuting Bats	10 m
Hazel Dormouse	10 m
Water Vole	10 m ⁶
Otter	10 m ⁷
Priority Mammals (hedgehog, brown hare, harvest mouse)	Site boundary only

¹ Zol selected to encompass the Suffolk Coastal Recreational Avoidance and Mitigation Strategy (RAMS) zone.

² A 8 km Zol was applied to Hamford Water SPA, SAC, and Ramsar site in accordance with the HRA of Tendring District Local Plan Section 2, section 4.30 (<https://tdcdemocracy.tendringdc.gov.uk/documents/s41097/A1%20Background%20Paper%202%20-%20Updated%20Habitats%20Regulation%20Assessment.pdf>).

³ Standard search area for Local Record Centres.

⁴ English Nature, Great Crested Newt Mitigation Guidelines, Peterborough: English Nature, 2001.

⁵ Natural England; DEFRA, "Badgers: surveys and mitigation for development projects," 2015. [Online]. Available: <https://www.gov.uk/guidance/badgers-surveys-and-mitigation-for-development-projects>. [Accessed 12 2021].

⁶ M. Dean, R. Strachan, D. Gow and R. Andrews, The Water Vole Mitigation Handbook (The Mammal Society Mitigation Guidance Series), F. Mathews and P. Chanin, Eds., London: The Mammal Society, 2016.

⁷ Northern Ireland Environment Agency, "Otters and Development," 2011. [Online]. Available: <https://cieem.net/resource/otters-and-development-northern-ireland-environment-agency/>.

(d) Desk study

Designated sites

- 8.48 The Multi-Agency Geographic Information for the Countryside (MAGIC) online database was searched in June 2022 (DEFRA, 2022) to obtain data on internationally (Special Protection Areas, Special Areas of Conservation, and Ramsar wetlands), nationally (Sites of Special Scientific Interest and National Nature Reserves), and some locally designated sites (Local Nature Reserves). In addition, MAGIC was searched to obtain data on woodlands listed on the Ancient Woodland Inventory.
- 8.49 Suffolk Biodiversity Information Service (SBIS) provided details of any non-statutory locally designated sites in November 2020.

Biological records

- 8.50 Multi-Agency Geographic Information for the Countryside (DEFRA, 2022) was searched in June 2022 to obtain data on granted European Protected Species Mitigation Licences and great crested newt (*Triturus cristatus*) survey licence returns provided by Natural England within 2 km of the site.
- 8.51 Data returned by SBIS in November 2020 included biological records for species within 2 km of the site. Only records made within the last ten years were considered for this report. Update data were not re-ordered for this ES Chapter, as site conditions and suitability for protected and priority species has not changed significantly since data were ordered in 2020.

(e) Scope of the assessment and zone of influence

- 8.52 A UK Habitat Classification System (Butcher, *et al.*, 2020) survey of the site was undertaken on 20 June 2022 by Sophie Barrell. Weather conditions at the time of the survey were dry and sunny, with an ambient temperature of approximately 16°C.
- 8.53 A list of plant species was compiled in accordance with methodology required to establish Primary Habitat types up to level 4 of the UK Habitat Classification professional hierarchy. Habitats were recorded to Level 5 of the hierarchy wherever possible, with care to accurately record all priority habitats (if present).
- 8.54 Secondary Codes were added to Primary Habitats where deemed appropriate, taking special care to map mandatory codes for habitat mosaic, complex, and origin. The survey was undertaken at the fine scale minimum mapping unit (MMU) of 25m² (polygons) and 1 m width/5 m long (polylines). Key ecological features below the MMU in either area or length were mapped as points. The habitat classification highlights the habitat distinctiveness and whether they reach the criteria for a priority habitat.

8.55 These habitats were also assessed against the Biodiversity Metric 3.1 condition assessment criteria (Panks *et al.*, 2022) to determine whether they are in poor, moderate or good condition.

8.56 Habitats were classified and assessed in terms of both their conservation importance and potential to support notable and/or protected species (based on habitat suitability and/or presence of field signs).

(f) Species scoping surveys

8.57 The following was searched for and recorded if present during the survey:

- All field signs of protected species or those of conservation interest, including burrows, droppings, footprints and hairs;
- Refuges and particular habitat types to be used by certain classes of fauna;
- Any mammal paths if found were noted and followed where possible;
- Entry points for fauna along fence and/or hedgerow boundaries if present; and
- Incidental sightings of invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

8.58 Incidental sightings of invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were also recorded, if present.

8.59 Taxon specific survey methods are detailed below, or if not undertaken, justification is given as to why these were not deemed necessary.

Plants

8.60 Based on results of the UK Habitat Classification Survey and the previous PEA report (66201978-SWE-ZZ-XX-RP-J-0001), no Phase 2 botanical surveys (e.g. National Vegetation Classification) were considered necessary.

Invertebrates

8.61 Based on results of the UK Habitat Classification Survey and the previous PEA report (66201978-SWE-ZZ-XX-RP-J-0001), no specific invertebrate surveys were considered necessary.

Great Crested Newt

8.62 Survey for great crested newt included Habitat Suitability Index (HSI) Assessment of ponds within 500 m of the site. This comprises a desk study section and a field survey section. Methodology is given below.

- 8.63 A study area, defined as the site boundary plus a 500 m buffer, was searched using OS maps for waterbodies which may be suitable for great crested newt. Waterbodies were scoped out from further assessment if they were:
- Separated from the project site by a significant ecological barrier (e.g. a busy road, a river, large expanses of arable land, or a large urbanised area) but not if ecological corridors (e.g. culverts, hedgerows) through that area exist;
 - Greater than 2 ha in area;
 - Clearly saline;
 - Clearly artificial (e.g. swimming pools, reservoirs); or
 - Clearly in use as fishing ponds.
- 8.64 A site visit was undertaken by Sophie Barrell on 14 July 2022 (where access was possible) in order to conduct the field survey aspect of the HSI assessment. Ponds were scoped out at this stage if they were:
- Clearly stocked with a significant number of fish (though it is recognised that great crested newt and small to moderate populations of some native fish species such as stickleback (*Gasterosteidae* spp.) can live concurrently);
 - Clearly heavily polluted;
 - Clearly in use for agricultural purposes (e.g. slurry pond);
 - An 'in-line' pond with moving water;
 - Dry;
 - Inaccessible; or
 - No longer present.
- 8.65 If ponds were scoped in at this stage, the surveyor then assessed each waterbody against ten Suitability Index (SI) criteria, following published guidance (Oldham *et. al.*, 2000).
- 8.66 In this instance, all ponds within the 500 m buffer were scoped out at the field survey stage, therefore a full HSI assessment was not undertaken.
- 8.67 Where ponds were inaccessible, the Natural England great crested newt District Level Licence risk map (Natural England, 2021) was checked in order to determine which risk area (green, amber, or red) the site falls into in order to determine the likely presence or absence of a great crested newt metapopulation in the area.

Reptiles

- 8.68 Based on results of the UK Habitat Classification Survey and the previous PEA report (66201978-SWE-ZZ-XX-RP-J-0001), no specific reptile surveys were considered necessary.

Wintering birds

- 8.69 Wintering bird surveys were recommended in the previous PEAR report and were carried out between November 2020 and February 2021. These results are considered to be valid for this ES Chapter.
- 8.70 Surveys followed a set transect which aimed to include all core habitat types on site. Surveys were carried out within the ownership boundary including the application site and adjacent habitats and were undertaken during the times of high tide where possible to determine whether any species from the local SPA and Ramsar designated site bird assemblages also utilise the site.
- 8.71 To provide a reasonable level of accuracy for determining the population status of wintering birds on the site it was considered that four separate surveys were required. Standard British Trust for Ornithology (BTO) species codes and symbols were used to identify bird species, activity and direction of flight, where appropriate.
- 8.72 Surveys were undertaken by Sophie Barrell and Alanna Cooper BSc (Hons) CEnv CSci C.WEM MCIEEM MCIWEM. Table 8.2 below details the dates and weather conditions for the surveys.

Table 8.2: wintering bird survey conditions

Date	Time	Weather
26 November 2020	07:30 – 09:15	Cloudy, calm, 4°C
20 December 2020	14:50 – 15:15	Sunny, clear, 10°C
25 January 2021	08:50 – 10:20	Sunny, clear, 1°C
25 February 2021	10:00 – 11:50	Cloudy, breezy, 10°C

- 8.73 Conservation status of species is as listed on the Conservation Designations for UK Taxa list published by the Joint Nature Conservation Committee (JNCC, 2020).
- 8.74 Species accounts for priority species were obtained from the JNCC (2007). The Suffolk Birds 2018 report (Suffolk Ornithologist's Group, 2018) has been used to estimate county population sizes and assess the status of species of conservation concern within the county.

Breeding birds

- 8.75 Breeding bird surveys were undertaken of the site between April and July 2022. Surveys followed a set transect which aimed to include all core habitat types on site. The breeding bird survey undertaken at the site was based upon the line transect survey methodology utilised by the British Trust for Ornithology (BTO) Breeding Bird Survey (BBS) (BTO, 2018).

- 8.76 The surveys were undertaken by experienced ornithologists Sophie Barrell and Philip Dutt PG Dip Agric BSc (Hons) MCIEEM. The surveys were undertaken during suitable weather conditions as summarised in Table 8.3 below.

Table 8.3: breeding bird survey conditions

Date	Time	Weather
28 April 2022	18:40 – 20:40	Cloudy, calm, 10°C
27 May 2022	05:15 – 06:30	Sunny, breezy, cloudy, 13°C
01 June 2022	04:45 – 06:30	Cloudy, breezy, 12°C
20 June 2022	04:30 – 06:20	Breezy, sunny, 16°C
04 July 2022	04:40 – 06:50	Cloudy, calm, 13°C
18 July 2022	05:10 - 6:45	Sunny, clear, 20°C

- 8.77 Conservation status of species is as listed on the Conservation Designations for UK Taxa list published by the Joint Nature Conservation Committee (JNCC, 2020).
- 8.78 Species accounts for priority species were obtained from the JNCC (2007).
- 8.79 The survey area included the whole of the area within the proposed development footprint, as well as any field boundaries or likely nesting areas immediately adjacent to the site. All field boundaries were walked slowly, and birds were identified by both sight and sound, with records of their behaviour taken and recorded onto plans.
- 8.80 Standard BTO species codes and symbols were used to identify bird species. Activity and direction of flight where appropriate were used as recommended for the Common Bird Census technique.
- 8.81 Species and activity data were analysed spatially to compare where species were identified during more than one survey visit and therefore are likely to be holding a territory and / or actively breeding in the area. If a bird exhibited breeding activity, such as commuting with nesting material or singing for example, it was judged to be breeding or attempting to breed on site. The survey analysis did not include mapping of territories.

- 8.82 Field maps and notes of bird sightings were analysed to determine the approximate locations of likely breeding sites and the numbers of birds encountered, and whether they were likely to be breeding on site, using the following criteria:

Possible

- Species (male / female) observed within possible nesting habitat on site.
- A male singing in the breeding season but only encountered on one survey visit.

Probable

- Same species of male singing in approximate same location on site for more than one survey visit.
- Singing male in the breeding season exhibiting territorial behaviour.
- Visiting probable nest site.
- Individuals exhibiting agitated behaviour (e.g. alarm calls).

Confirmed

- Observed building a nest or with nesting material in beak.
- Active nest observed.
- Adults entering / leaving nest site regularly.
- Used nest or eggshells noted on site.
- Distraction display or injury feigning.
- Adult with dependant young.

- 8.83 Locations of sightings and analysis of activity / behaviour was used to estimate the numbers of pairs present where breeding was probable or confirmed. Incidental sightings of birds noted by ecologists during other site visits were also described.
- 8.84 The Suffolk Birds 2018 report (Suffolk Ornithologist's Group, 2018) has been used to estimate county population sizes and assess the status of species of conservation concern within the county.

Roosting bats

- 8.85 A Preliminary Tree Roost Assessment (PTRA) was undertaken of all trees within the site boundary, and a 10 m buffer thereof, on the 20 June 2022. The survey was undertaken in line with current survey guidance (Collins, 2016).
- 8.86 The surveyor used a torch and monocular / binoculars to identify and assess Potential Roosting Features (PRFs) which were then used to determine the Bat Roosting Potential (BRP) of the tree, based on Table 8.4 below (adapted from Collins, 2016).

Table 8.4: bat roosting potential suitability table

Bat roosting potential	Description
Negligible	Negligible habitat features on site likely to be used roosting bats.
Low	A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen only with very limited roosting potential.
Moderate	A tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).
High	A tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potential for longer periods of time due to their size, shelter, protection, conditions, and surrounding habitat.
Confirmed	A tree with one or more confirmed roosts.

8.87 Where PRFs were identified, the following data was recorded:

- The tree reference on which the PRF is located;
- The location of the PRF;
- The elevation and orientation of the PRF;
- The internal size of the PRF (if known);
- A description of the PRF; and
- The BRP level assigned to the PRF.

8.88 During the PRA survey evidence of bats was also searched for. This includes:

- Bat droppings (if found these were collected for eDNA analysis);
- Staining around PRF entrances;
- Feeding remains (such as moth wings);
- Scratch marks around PRF entrances; and
- Dead bat remains.

8.89 If evidence of bats in or around a PRF was found, then this PRF was recorded as a confirmed roost.

Foraging and commuting bats

- 8.90 Value of habitat for foraging and commuting bats was assessed against the criteria detailed in Table 8.5 (adapted from Collins, 2016) Data used to determine habitat value include the results of the UK Habitat Classification survey, and aerial imagery of the site and surrounding landscape.

Table 8.5: commuting and foraging value of habitats for bats.

Commuting and foraging value	Description
Negligible	Negligible habitat features on site likely to be used by commuting or foraging bats.
Low	Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree or patch of scrub.
Moderate	Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland, or water.
High	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree lined watercourses, and grazed parkland. Site is close to and connected to known roosts.

- 8.91 Based on the results of the habitats suitability assessment for bats, the likely impacts, and professional judgement, no further (e.g. transect or static) bat surveys were considered necessary.

Badger

- 8.92 Based on results of the UK Habitat Classification Survey and the previous PEA report (66201978-SWE-ZZ-XX-RP-J-0001), no specific badger surveys were considered necessary.

Water vole

- 8.93 Based on results of the UK Habitat Classification Survey and the previous PEA report (66201978-SWE-ZZ-XX-RP-J-0001), no specific water vole (*Arvicola amphibius*) surveys were considered necessary.

Otter

- 8.94 Based on results of the UK Habitat Classification Survey and the previous PEA report (66201978-SWE-ZZ-XX-RP-J-0001), no specific otter (*Lutra lutra*) surveys were considered necessary.

Hazel Dormouse

- 8.95 Based on results of the UK Habitat Classification Survey and the previous PEA report (66201978-SWE-ZZ-XX-RP-J-0001), no specific hazel dormouse (*Muscardinus avellanarius*) surveys were considered necessary.

Other priority mammals

- 8.96 Based on results of the UK Habitat Classification Survey and the previous PEA report (66201978-SWE-ZZ-XX-RP-J-0001), no specific surveys for European hedgehog (*Erinaceus europaeus*), brown hare (*Lepus europaeus*), or harvest mouse (*Micromys minutus*) were considered necessary.

(g) Limitations

- 8.97 Two of four waterbodies within the survey area for great crested newt were inaccessible, therefore could not be subject to survey. Given availability of desk study data and the lack of suitable habitat on site, this is not considered a significant limitation.
- 8.98 No other limitations apply.

(h) Impact assessment

- 8.99 Due to the difference in anticipated impacts between the construction and the operational phases of the scheme, and the need to include information to inform a Habitats Regulations Assessment, the effects of the construction and operational phases of the development were considered separately for the impact assessment.
- 8.100 Potential effects on important ecological features are considered with full characterisation and significance assessed for residual effects after the consideration of avoidance and mitigation measures. Following recommendations of avoidance and mitigation measures, residual effects are considered in combination with nearby developments. Compensation measures are then recommended for these residual effects. Lastly, opportunities for Biodiversity Net Gain and other ecological enhancements, are outlined in accordance with national and local planning policies.

Important ecological features

- 8.101 The ‘important ecological features’ to be considered within the impact assessment were determined following the desk study, UK Habitat Classification Survey, and protected species surveys as described in paragraphs 8.57 to 8.96.
- 8.102 The geographic level of importance of each of the features was assessed, as recommended within the CIEEM guidance on ecological impact assessment (CIEEM, 2018), using the criteria in Table 8.6 below.

Table 8.6: assessment of conservation value of ecological features.

Geographic level of importance	Brief description
International and European	<ul style="list-style-type: none"> • Habitats that meet criteria for Ramsar, SAC or SPA site. • A species present in internationally important numbers (>1% of international population). • Notable species which is part of the cited interest of an SPA or SAC and which regularly occurs in internationally or nationally important numbers.
National	<ul style="list-style-type: none"> • Habitats that meet criteria for SSSI or an important reserve to England. • A species present in nationally important numbers (>1% of UK population). • A species which is part of the cited interest of a SSSI and which regularly occurs in internationally or nationally important numbers. • Rare breeding species (e.g. birds with <300 UK breeding pairs).
Regional	<ul style="list-style-type: none"> • A local site with important regional habitats or significant populations of species of principal importance under the NERC act. • Species present in regionally important numbers (>1% of regional population). • Species listed as priority species, which are not covered above, and which regularly occur in regionally important numbers. • Sustainable populations of a species that is rare or scarce within a region. • Species on the BoCC Red List and which regularly occur in regionally important numbers.

Geographic level of importance	Brief description
County	<ul style="list-style-type: none"> • A local site with a habitat that is characteristic of the county or rare on a county scale, or with significant populations of locally important species. • Species present in county important numbers (>1% of county population). • Species listed as priority species, which are not covered above, and which regularly occurs in county important numbers • Sustainable populations of a species that is rare or scarce within a county. • A site designated for its county important assemblage of birds, reptiles, invertebrates, etc. • Species on the BoCC Red or Amber List and which regularly occur in county important numbers.
Local	<ul style="list-style-type: none"> • A site which has wildlife corridors likely to be essential to allow viable movement of species or improve the biodiversity of the area. • Species listed as priority species, which are not covered above, and are rare in the locality. • Species present in numbers just under county importance (<1% of county population). • Sustainable populations of a species that is rare or scarce within the locality. • A site whose designation is just under for inclusion for its county important assemblage of a particular species on site. • Other species on the BoCC Red or Amber List and which are considered to regularly occur in locally important numbers.

Characterisation of effects

8.103 The following were used when categorising the ecological effects:

- Nature of change: beneficial, neutral or adverse
- Magnitude of change: high, medium, low or negligible
- Sensitivity of receptor: high, medium, low or negligible
- Duration: long, medium or short term
- Permanence: permanent or temporary
- Evaluation of significance: major, moderate, minor or no significance
- Level of certainty: absolute, reasonable or uncertain

Significance of effects

- 8.104 Assessment of significance of effect for the Environmental Statement Chapter follows methodology as set out in JCN Scoping Report. This is determined through assessment of the magnitude of change against the sensitivity of the receptor (see Table 8.7).

Table 8.7: 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

Ecological baseline

(a) Background

- 8.105 Factual results of the desk study and field surveys within the context of their relative Zones of Influence are given in this section to describe the current and, where possible, predict the future ecological baseline of the site, and identify important ecological features and functions. Impacts and effects of the proposed development on important ecological features are assessed in the Assessment of Effects.

(b) Desk study results

Statutory designated sites

- 8.106 There are no designated sites found within the site boundary.
- 8.107 Consultation of the MAGIC online interactive mapping tool confirms the presence of nine internationally designated sites within 13 km and three nationally designated sites within 5 km. These are shown on figures 65206261-SWE-ZZ-XX-DR-J-0002 and 65206261-SWE-ZZ-XX-DR-J-0003, and are also summarised in Table 8.8 below.
- 8.108 The site also falls within the Deben Estuary SSSI Impact Risk Zone. Standing advice from Natural England states that for all developments within this zone, the Local Planning Authority should consult with Natural England. It also states that residential developments in this zone are required to pay financial contributions towards the Suffolk Recreational Disturbance Avoidance & Mitigation Strategy (RAMS). The client should consult directly with East Suffolk District Council on further action required pertaining to the Impact Risk Zone.

Non-statutory designated sites and habitats

- 8.109 Data received from SBIS confirms the presence of two locally designated non-statutory County Wildlife Sites (CWS) within 2 km of the site. These are shown in Appendix 8.2.
- 8.110 No areas of Ancient Woodland (as listed on England's Ancient Woodland Inventory) are present within 2 km of the site.

Biological records

- 8.111 Biological records were returned by SBIS on 27 November 2020. Results are summarised in Appendix 8.3 (Table 9-1). Records are omitted where they are greater than ten years old, a marine mammal, and those which do not pertain to protected, priority, or notable species.

Table 8.8: summary of relevant designated sites

Site name	Designations *	Area (ha)	Distance and direction from site	Description
Internationally designated sites				
Deben Estuary	Ramsar SPA	981	1.666 km N 1.666 km N	<p>Deben Estuary SPA is designated for overwintering avocet (<i>Recurvirostra avosetta</i>) (7.5% of the GB population, 1991/92 – 1995/96) and dark bellied brent goose (<i>Branta bernicla bernicla</i>) (0.8% GB population, 1991/92 – 1995/96).</p> <p>Deben Estuary Ramsar is designated for its population of the mollusc <i>Vertigo angustior</i> (Habitats Directive Annex II; British Red Data Book Endangered) and for its population of overwintering dark bellied brent goose (1.9% GB population, 1998/99 – 2002/03).</p>
Alde-Ore Estuary	Ramsar SPA	2,534 2,403	5.709 km NE 5.709 km NE	<p>Alde-Ore Estuary SPA is designated for important breeding populations of marsh harrier (<i>Circus aeruginosus</i>) (1.9% of the GB population, 1993- 1997), avocet (23.1% of the GB population, 1990-1994), little tern (<i>Sterna albifrons</i>) (2% of the GB population, 1993/94 - 1996-98), sandwich tern (<i>Sterna sandvicensis</i>) (1.2% of the GB population, 1992-1996), and lesser black-backed gull (<i>Larus fuscus</i>) (11.3% of the GB population, 1994-1998) as well as important overwintering populations of ruff (<i>Philomachus pugnax</i>) (0.4% of the GB population, 1991/92 - 1995/96), avocet (60.3% of the GB population, 1991/92 - 1995/96), and common redshank (<i>Tringa totanus</i>) (1.1% of the population, 1991/92 - 1995/96).</p> <p>Alde-Ore Estuary Ramsar is designated for a number of nationally-scarce plant species and British Red Data Book invertebrates, for a notable assemblage of breeding and wintering wetland birds, and for individual species populations at international levels of importance including breeding lesser black-backed gull (3.9% of the population, 2000), and wintering avocet (1.6% of the population, 1998/99 - 2002/03) and common redshank (2% of the GB population, 1998/99 - 2002/03).</p>

Site name	Designations *	Area (ha)	Distance and direction from site	Description
Stour & Orwell Estuaries	Ramsar SPA	3,673	4.652 km W 4.652 km W	<p>Stour & Orwell Estuaries SPA is designated for important populations of breeding avocet (3.6% of the GB population, 1996-2000) as well as important populations of overwintering pintail (<i>Anas acuta</i>) (1.2% of the population, 1995/96 - 1999/2000), dark bellied brent geese (1.2% of the population, 1995/96 - 1999/2000), dunlin (<i>Calidris alpina alpina</i>) (1.4% of the population, 1995/96 - 1999/2000), red knot (<i>Calidris canutus</i>) (1.3% of the population, 1995/96 - 1999/2000), black-tailed godwit (<i>Limosa limosa islandica</i>) (7.3% of the population, 1995/96 - 1999/2000), grey plover (<i>Pluvialis squatarola</i>) (1.3% of the population, 1995/96 - 1999/2000), common redshank (2.8% of the population, 1995/96 - 1999/2000), and an important population of migratory common redshank (2% of the population, 1995/96 - 1999/2000).</p> <p>In addition, the areas supports an internationally important assemblage of 63,017 overwintering waterfowl (1991/92 - 1995/96) of various other notable species.</p> <p>Stour & Orwell Estuaries Ramsar is designated for nationally scarce plants and British Red Data Book invertebrates, for internationally important waterfowl assemblages (51,285 individuals, 1998/99- 2002/2003) and for internationally important populations of overwintering black-tailed godwit (4.6% of the population, 1998/99 - 2002/03), common redshank (1% of the population, 1998/99 - 2002/03), dark bellied brent goose (1% of the population, 1998/99 - 2002/03), dunlin (1% of the population, 1998/99 - 2002/03), and grey plover (1.2% of the population, 1998/99 - 2002/03) as well as an internationally important summer population of red knot (1.3% of the population, 1998/99 - 2002/03).</p>
Alde Ore & Butley Estuaries	SAC	1,633	9.170 km NE	<p>Alde Ore & Butley Estuaries SAC is designated for its Annex I habitat type, Estuaries. In this instance the estuary is made up of three rivers and is the only bar-built estuary in the UK with a shingle bar which has been extending rapidly along the coast since 1530. The estuary contains large areas of shallow water over subtidal sediments, and extensive mudflats and saltmarshes which grade into shingle habitat, grassland, and reedbed.</p>

Site name	Designations *	Area (ha)	Distance and direction from site	Description
Orfordness-Shingle Street	SAC	888	5.708 km NE	<p>Orfordness-Shingle Street SAC is designated for three Annex I habitat types, being Coastal lagoons, Annual vegetation of drift lines, and Perennial vegetation of stony banks.</p> <p>The site features a series of percolation lagoons which have developed in the shingle bank adjacent to the shore at the mouth of the Ore estuary.</p> <p>The fauna of these lagoons includes typical lagoon species, such as the cockle <i>Cerastoderma glaucum</i>, the ostracod <i>Cyprideis torosa</i> and the gastropods <i>Littorina saxatilis tenebrosa</i> and <i>Hydrobia ventrosa</i>. The nationally rare starlet sea anemone (<i>Nematostella vectensis</i>) is also found at the site.</p> <p>Orfordness is an extensive shingle spit some 15 km in length and is one of two sites representing Annual vegetation of drift lines on the east coast of England. In contrast to Minsmere to Walberswick Heaths and Marshes, drift-line vegetation occurs on the sheltered, western side of the spit, at the transition from shingle to saltmarsh, as well as on the exposed eastern coast. The drift-line community is widespread on the site and comprises sea beet (<i>Beta vulgaris maritima</i>) and orache (<i>Atriplex</i> spp.) in a strip 2-5 m wide.</p> <p>The 15 km long spit supports some of the largest and most natural sequences in the UK of shingle vegetation affected by salt spray. The southern end of the spit has a particularly fine series of undisturbed ridges, with zonation of communities determined by the ridge pattern. Pioneer communities with sea pea (<i>Lathyrus japonicus</i>) and false oat- grass (<i>Arrhenatherum elatius</i>) grassland occur. Locally these are nutrient- enriched by the presence of a gull colony; elsewhere they support rich lichen communities. The northern part of Orfordness has suffered considerable damage from defence-related activities but a restoration programme for the shingle vegetation is underway.</p>
Sandlings	SPA	3,408	9.416 km N	<p>Sandlings SPA is designated for its important breeding populations of nightjar (<i>Caprimulgus europaeus</i>) (3.2% of the GB population, 1992) and woodlark (<i>Lullula arborea</i>) (10.3% of the GB population, 1997).</p>

Site name	Designations *	Area (ha)	Distance and direction from site	Description
Nationally designated sites				
Landguard Common	SSSI	30	4.380 km SW	<p>Landguard Common SSSI is a sand and shingle spit consisting of a loose shingle foreshore backed by a stabilized, vegetated beach, earth banks, and scrub. The site is also of some ornithological interest as a landfall site for passage migrants and for breeding shorebirds. A visitor centre is situated on the west side of the site immediately south of Felixstowe port. Sensitive areas of the site are designated as dogs on short leashes only, and dog waste bins are provided.</p> <p>The north part of the foreshore is protected by sea defences but this and the beach crest further south is sea washed and provides bare shingle for colonizing shingle species. The bare shingle is also used by nesting Little Tern and Ringed Plover (<i>Charadrius hiaticula</i>). Inland the shingle is stabilized and vegetated. To the south Red Fescue, Early Hair Grass and Sand Sedge predominate whilst further north and on earthworks this merges with dry neutral grassland. There are several wet areas which contain marsh or saltmarsh species.</p> <p>Currently all three units of this SSSI are reportedly in Favourable condition.</p>
Orwell Estuary	SSSI	1,334	4.646 km W	The Orwell Estuary SSSI is of national importance for breeding avocet, its breeding bird assemblage of open waters and their margins, nine species of wintering waterfowl (including black-tailed godwit), an assemblage of vascular plants, and intertidal mud habitats.
Deben Estuary	SSSI	981	1.666 km N	The Deben Estuary SSSI is important for its populations of overwintering waders and wildfowl and also for its extensive and diverse saltmarsh communities. Several estuarine plants and invertebrates with a nationally restricted distribution are also present.

Site name	Designations *	Area (ha)	Distance and direction from site	Description
Locally designated sites				
Kings Fleet	CWS	9	1.120 km N	<p>King's Fleet is an extensive area of open water and former tributary creek now separated from the tidal estuary by a sea wall. Large numbers of wetland birds use the site for breeding and roosting in summer and autumn, including breeding bittern (<i>Botaurus stellaris</i>) and corn bunting (<i>Emberiza calandra</i>). The site is an important roost for swallows (<i>Hirundo rustica</i>) and for overwintering hen harrier (<i>Circus cyaneus</i>) and marsh harrier.</p> <p>The good water quality supports diverse invertebrate assemblages, and water vole and otter have been recorded.</p>
Felixstowe Ferry	CWS	25	0.878 km E	<p>Tomline Wall, a man-made flood defence bank, supports slow worm (<i>Anguis fragilis</i>), grass snake (<i>Natrix helvetica</i>), viviparous lizard (<i>Zootoca vivipara</i>), skylark (<i>Alauda arvensis</i>), and invertebrate assemblages.</p> <p>Dykes either side of the bank support wetland bird species and water vole. Notable and scarce botanical species are present at the northern end of Tomline wall.</p>

* Ramsar (Convention on Wetlands); SPA = Special Protection Area; SAC = Special Area of Conservation; SSSI = Site of Special Scientific Interest; CWS = County Wildlife Site.

(c) UK Habitat Classification survey results

8.112 The results of the UK Habitat Classification survey are presented below, with primary habitats given first and secondary codes (if applicable) given in parentheses. Results are illustrated on figure 65206261-SWE-ZZ-XX-DR-J-0004. Photos are given in Appendix 8.4.

8.113 The following habitat types are present on site:

- g4 – Modified grassland
- wlg6 – Line of trees
- h2a – Hedgerow (priority habitat)
- clc - Cereal crop

8.114 These habitats were classified and assessed using the Biodiversity Metric 3.1 condition assessment included as Appendix 8.5.

g4 – modified grassland

8.115 Unmanaged, modified grassland margins, 0.5 m wide, were present along the northern, eastern, and western boundaries of the arable field on site. Species present within these margins include perennial rye grass (*Lolium perenne*), cleavers (*Galium aparine*), hogweed (*Heracleum sphondylium*), false-oat grass (*Arrhenatherum elatius*), clover (*Trifolium* sp.), mallow (*Malva* sp.), common nettle (*Urtica dioica*), red dead-nettle (*Lamium purpureum*), white dead-nettle (*Lamium album*), ribwort plantain (*Plantago lanceolata*), and common groundsel (*Senecio vulgaris*).

8.116 A strip of well maintained, mown modified grassland along the southern edge of the site is also a public footpath which leads from Ferry Road to local park Eastward Ho, and The Grove and Abbey Grove Woodland (Appendix 8.4; Photo 1).

8.117 The modified grassland field margin was species-poor with damage due to the close proximity of the arable field and associated agricultural activities, and therefore this habitat did not qualify as an arable field margin priority habitat. It has been assessed as being in Poor condition.

wlg6 – line of trees

8.118 A row of mature pedunculate oak (*Quercus robur*), turkey oak (*Quercus cerris*), horse chestnut (*Aesculus hippocastanum*), and sycamore (*Acer pseudoplatanus*) trees is present along the southern end of the eastern site boundary and a row of conifers with a single sycamore is present along the northern end of the western site boundary (Appendix 8.4; Photo 2).

- 8.119 The tree lines are a mix of native and non-native species, predominately the latter, provide continuous canopy cover, include mature trees and are considered to be in a healthy condition. However, they are in close proximity to the arable field edge and are therefore not protected from potential adverse impacts from farming operations.

h2a – hedgerow (priority habitat)

- 8.120 Three hedgerows are present around the north, west, and east boundaries of the site.
- 8.121 The north hedgerow is managed and comprised predominately of common hawthorn (*Crataegus monogyna*) with some elder (*Sambucus nigra*) and rose (*Rosa* sp.). The east hedgerow is predominately blackthorn (*Prunus spinosa*) with some elder, though is being overgrown with bramble (*Rubus fruticosus* agg.). The west hedgerow is comprised of common hawthorn until it meets coniferous trees at the boundary of an adjacent residential garden (Appendix 8.4; Photo 3).
- 8.122 The ground and perennial vegetation present along the entire length of the hedgerows was comprised undesirable species which indicate nutrient enrichment and damage, likely from the close proximity to the arable field and the associated agricultural activities such as fertilizer application. The hedgerow was < 1.5 m high and wide along its length, though was continuous with no significant base gaps. Therefore, the condition of these hedgerows has been assessed as Moderate.

c/c – cereal crop

- 8.123 The site is predominantly an arable field growing cereal crops (Appendix 8.4; Photos 1 and 2).
- 8.124 Condition assessments are not applicable to this habitat.

(d) Species scoping surveys

Plants

- 8.125 Based on results of the UK Habitat Classification survey and the current nature of the site as an arable field which is likely subject to herbicide and fertiliser use, the site was not considered suitable for rare or notable plant species.

Invertebrates

- 8.126 Based on results of the UK Habitat Classification survey and the current nature of the site as an arable field which is likely subject to pesticide and fertiliser pollution, the site was not considered suitable for significant numbers of individual invertebrate species, or assemblages thereof.

- 8.127 Biological records from SBIS for stag beetle (*Lucanus cervus*) and several priority Lepidoptera species exist within the search area, though these are not expected to occur on site in significant numbers.

Great Crested Newt

- 8.128 There are no waterbodies located within the site boundary. Four waterbodies (P1 to P4) are located within 500 m of the site (figure 65206261-SWE-ZZ-XX-DR-J-0005). Of these, two waterbodies were dry (P1 and P2) and two were inaccessible for the surveyor with no connecting habitat to the site (P3 and P4). Therefore, no HSI assessment could be undertaken.
- 8.129 In lieu of the HSI survey, Natural England's great crested newt district level licence risk map for the site was checked. The site was found to be in a green risk zone, indicating low probability of significant great crested newt populations being present in the area.
- 8.130 Neither SBIS or MAGIC returned records of great crested newt or records of granted great crested newt protected species licences within 2 km of the site.
- 8.131 Based on these results and limited presence of suitable habitat on site, it is considered unlikely that great crested newt will occur on site, and as such they are scoped out as a potential constraint and will not be considered further.

Widespread amphibians

- 8.132 The hedgerow and modified grassland provide negligible terrestrial habitat on site for amphibians, and significant numbers thereof are not anticipated to occur.

Reptiles

- 8.133 The hedgerows and modified grassland provide limited suitable habitat for reptiles on site, though may provide refuge opportunities and a dispersal corridor to individual animals.

Birds

- 8.134 Deben Estuary Ramsar Special Protection Area (SPA), Alde-Ore Estuary Ramsar SPA, Stour & Orwell Estuaries Ramsar and SPA, and Sandlings SPA are internationally designated sites which fall within the ZOI of the site and are designated for breeding, wintering, and migratory bird assemblages.

- 8.135 Wintering bird species within these assemblages include: dark-bellied brent geese, common redshank, spotted redshank (*Tringa erythropus*), avocet, black-tailed godwit, shelduck, shoveller (*Spatula clypeata*), white-fronted goose, wigeon (*Anas penelope*), bittern, Bewick's swan (*Cygnus columbianus bewickii*), hen harrier (*Circus cyaneus*), golden plover (*Pluvialis apricaria*), short-eared owl (*Asio flammeus*), grey plover, red knot, great crested grebe (*Podiceps cristatus cristatus*), cormorant (*Phalacrocorax carbo carbo*), curlew (*Numenius arquata arquata*), and turnstone (*Arenaria interpres interpres*).
- 8.136 Breeding bird species within these assemblages include: lesser-black backed gull, avocet, little tern, marsh harrier, sandwich tern, ruff, gadwall (*Mareca strepera*), shoveler, herring gull (*Larus argentatus*), nightjar, woodlark, Mediterranean gull (*Ichthyophaga melanocephala*), and black-headed gull (*Chroicocephalus ridibundus*).
- 8.137 Migratory bird species within these assemblages include: including black-tailed godwit, greenshank (*Tringa nebularia*), bean goose (*Anser fabalis fabalis*), shelduck, avocet, spotted redshank, common redshank, lesser black-backed gull, redshank, dark-bellied brent geese, grey plover, and dunlin.
- 8.138 The proposed development site does not comprise suitable habitat to support the majority of the species within these assemblages due to the lack of waterbodies and reedbed on site.

Wintering birds

- 8.139 A total of 21 species were recorded on site during the wintering bird surveys. The full species list is included in Appendix 8.6. Notable species recorded are shown on figures 65206261-SWE-ZZ-XX-DR-J-0006 to 65206261-SWE-ZZ-XX-DR-J-0009 inclusive and are included in Table 8.9 below.

Table 8.9: results of the wintering bird surveys

Common name	Scientific name	Conservation status *	Conservation status within Suffolk	Number of individuals recorded			
				Survey 1	Survey 2	Survey 3	Survey 4
Black-headed Gull	<i>Chroicocephalus ridibundus</i>	Amber BOCC	Very common resident, winter visitor and passage migrant	5	2	2	
Common Gull	<i>Larus canus</i>	Amber BOCC			1		
Herring Gull	<i>Larus argentatus</i>	Red BOCC NERC	Very common resident, winter visitor and passage migrant		1	2	
House Sparrow	<i>Passer domesticus</i>	Red BOCC NERC	Common but declining resident	19		6	13
Kestrel	<i>Falco tinnunculus</i>	Amber BOCC	Common resident. Uncommon passage migrant	2	1	1	
Meadow Pipit	<i>Anthus pratensis</i>	Amber BOCC	Common resident, winter visitor and passage migrant	1			
Skylark	<i>Alauda arvensis</i>	Red BOCC NERC	Common resident, passage migrant and winter visitor				1
Starling	<i>Sturnus vulgaris</i>	Red BOCC NERC	Very common but declining resident, winter visitor and passage migrant	33		6	
Wood pigeon	<i>Columba palumbus</i>	Amber BOCC	Very common resident, winter visitor and passage migrant	8	5	6	7
Wren	<i>Troglodytes troglodytes</i>	Amber BOCC	Very common resident and scarce passage migrant	1			1

* BOCC = Birds of Conservation Concern list; NERC = Natural Environment and Rural Communities Act 2006 (Section 41 listed species)

8.140 Birds were mainly associated with the hedgerow and tree line along the boundaries of the site, such as house sparrows, or observed flying over the site. There is some potential for skylarks, meadow pipits, and starling to forage within the arable field and for kestrel to hunt over the marginal modified grassland on site.

Wintering birds and designated sites

8.141 Deben Estuary Ramsar SPA, Alde-Ore Estuary Ramsar and SPA, Stour & Orwell Estuaries Ramsar and SPA, and Sandlings SPA are designated for their wintering bird assemblages, as described in paragraph 8.107.

- 8.142 The wintering bird surveys of the proposed development site found no signs of any species within these assemblages present on the site or adjacent land. Considering this, it is not considered likely that there will be any significant impacts on the wintering birds associated with these internationally designated sites as a result of the proposed development. The full assessment of impacts of the proposed development on wintering birds is given in the Assessment of Impacts section, below.

Breeding birds

- 8.143 A total of 34 species were recorded on site during the breeding bird surveys. The full species list is included in Appendix 8.7. The notable species recorded during the breeding birds surveys are shown on figures 65206261-SWE-ZZ-XX-DR-J-0010 to 65206261-SWE-ZZ-XX-DR-J-0015 inclusive and are included in Table 8.10 below.

Table 8.10: results of the breeding birds survey

Common name	Scientific name	Conservation status *	Conservation status within Suffolk	Number of individuals recorded						Breeding status on site
				Survey 1	Survey 2	Survey 3	Survey 4	Survey 5	Survey 6	
Black-headed Gull	<i>Chroicocephalus ridibundus</i>	Amber BOCC	Very common resident, winter visitor and passage migrant				1	1	3	Not breeding on or adjacent to site
Cuckoo	<i>Cuculus canorus</i>	Red BOCC NERC	Declining summer visitor and passage migrant		1			1		Not breeding on or adjacent to site
Dunnock	<i>Prunella modularis</i>	Amber BOCC NERC	Very common resident and fairly common passage migrant	2	1	1				Possible breeding on site
Greenfinch	<i>Chloris chloris</i>	Red BOCC	Very common, but apparently declining, resident and passage migrant	1						Not breeding on or adjacent to site
Herring Gull	<i>Larus argentatus</i>	Red BOCC NERC	Very common resident, winter visitor and passage migrant	1	3		1	2	1	Not breeding on or adjacent to site
House Martin	<i>Delichon urbicum</i>	Red BOCC	Common summer visitor and passage migrant			7	12	8	13	Confirmed breeding adjacent to site
House Sparrow	<i>Passer domesticus</i>	Red BOCC NERC	Common but declining resident		5	11	15	11	7	Probable breeding on site
Kestrel	<i>Falco tinnunculus</i>	Amber BOCC	Common resident. Uncommon passage migrant	1						Not breeding on or adjacent to site
Lesser Black-backed Gull	<i>Larus fuscus</i>	Amber BOCC	Very common summer visitor and passage migrant. Increasing numbers overwinter	1		1	3	3	16	Probable breeding adjacent to site
Linnet	<i>Linaria cannabina</i>	Red BOCC NERC	Common summer visitor and passage migrant. Overwinters in small numbers			2				Possible breeding adjacent to site

Common name	Scientific name	Conservation status *	Conservation status within Suffolk	Number of individuals recorded						Breeding status on site
				Survey 1	Survey 2	Survey 3	Survey 4	Survey 5	Survey 6	
Rook	<i>Corvus frugilegus</i>	Amber BOCC	Very common resident, winter visitor and passage migrant	2						Not breeding on or adjacent to site
Skylark	<i>Alauda arvensis</i>	Red BOCC NERC	Common resident, passage migrant and winter visitor		3	1	1	1	1	Confirmed breeding on site
Starling	<i>Sturnus vulgaris</i>	Red BOCC NERC	Very common but declining resident, winter visitor and passage migrant	1	2	17	4	2	2	Probable breeding adjacent to site
Stock Dove	<i>Columba oenas</i>	Amber BOCC	Common resident, passage migrant and winter visitor				2			Possible breeding adjacent to site
Swift	<i>Apus apus</i>	Red BOCC	Very common summer visitor and passage migrant			2	1	8	1	Possible breeding adjacent to site
Whitethroat	<i>Sylvia communis</i>	Amber BOCC	Common summer visitor and passage migrant					2		Possible breeding on or adjacent to site
Wood pigeon	<i>Columba palumbus</i>	Amber BOCC	Very common resident, winter visitor and passage migrant	0	5	6	6	5	8	Probable breeding on or adjacent to site
Wren	<i>Troglodytes troglodytes</i>	Amber BOCC	Very common resident and scarce passage migrant	2	2	1		1	1	Probable breeding on or adjacent to site

* BOCC = Birds of Conservation Concern list; NERC = Natural Environment and Rural Communities Act 2006 (Section 41 listed species).

- 8.144 Skylark were confirmed to be breeding within the arable field on site due to the territorial singing display flights of at least one male which was recorded on site during five of the six surveys.
- 8.145 A colony of house martin were confirmed breeding in the residential housing area to the south of the site. Starling and house sparrow were also considered to be probably breeding in the residential area adjacent to the site. Swift may also be nesting within the residential area adjacent to the site.
- 8.146 Dunnock, whitethroat, greenfinch, linnet, wren, and woodpigeon were considered to be probably breeding in the trees, hedgerows, and / or arable margins within and / or adjacent to the site. Lesser black-backed gull and stock dove were likely breeding near the site.
- 8.147 Black-headed gull, herring gull, kestrel, and rook were only recorded commuting over the site and were considered unlikely to be breeding in or adjacent to the site.
- 8.148 No schedule I species or species in numbers of local importance were recorded on site.

Breeding birds and designated sites

- 8.149 Deben Estuary Ramsar SPA, Alde-Ore Estuary Ramsar and SPA, Stour & Orwell Estuaries Ramsar SPA, and Sandlings SPA are designated for their breeding bird assemblages, as described in paragraph 8.107.
- 8.150 The only species recorded on the proposed development site which are notified species for these designated sites are lesser black-backed gull, herring gull, and black-headed gull. Of these, herring gull and black-headed gull were only recorded commuting over the site, and lesser black-backed gull was considered likely to be breeding off-site. Considering this, it is not considered likely that there will be any significant impacts on the breeding birds of these international statutory sites as a result of the proposed development. The full assessment of impacts of the proposed development on wintering birds is given in the Assessment of Impacts.

Roosting bats

- 8.151 Based on the PTR survey, no trees feature PRFs, therefore all trees within the site including along its boundaries were assessed as having Negligible bat roosting potential. As such, roosting bats are scoped out and are not considered further in this report.

Foraging and commuting bats

- 8.152 The site was assessed as having limited value for foraging and commuting bats. The c1c Cereal crop and g4 Modified grassland habitats were assessed as having Negligible value, while the w1g6 Line of individual trees was assessed as having Low value. The h2a hedgerow (priority habitat) running around the site was assessed as having Moderate value.
- 8.153 Under current guidance, transect and / or static surveys may be undertaken for habitats of low value based on professional judgement of the ecologist, and should be undertaken for habitats of moderate or high value. However, due to the small proportion of the site area being comprised of habitats of Low or Moderate value and the moderate / poor condition of those habitats which will largely be retained, the lack of habitat connectivity to the wider landscape, and the presumption that a sensitive lighting strategy will be developed for the site which will not increase artificial lighting levels on the trees or hedgerows, it was not deemed necessary or pragmatic to undertake further surveys for foraging and commuting bats.

Badger

- 8.154 The site is suboptimal for badger sett building, with some limited potential for setts of lower conservation value (e.g. outlier) along hedgerow boundaries. None were identified during the PEA survey or subsequent site visits. The grassland margins and arable crop provide suboptimal foraging habitat.
- 8.155 Badger are known to be historically active in the area, from the cumulative impact assessment of nearby development applications.

Water Vole and Otter

- 8.156 No suitable habitat for water vole or otter was recorded on or in close proximity to the site. Therefore, both species are considered to be absent from the site and not considered further in this report.

Hazel Dormouse

- 8.157 No suitable habitat for dormice was recorded during the surveys and so this species is considered to be absent from the site and not considered further in this report.

Other priority mammals

- 8.158 The hedgerows and modified grassland provide limited refuge, dispersal, and foraging habitat for hedgehog.
- 8.159 The arable crop and grassland margins are considered suitable for brown hare for foraging and breeding.
- 8.160 Habitats on site are not considered suitable for harvest mouse.

Assessment of effects

(a) Background

8.161 This section sets out the important ecological features identified through surveys undertaken, and sets out the potential effects of the proposed development impacts based on the criteria set out in Table 8.7.

(b) Important ecological features and potential effects

8.162 The ecological features which are considered important in the context of the site and so will be the subject of the environmental impact assessment are listed in Table 8.11 below, along with their geographic importance. Any features discussed in section 6 which are not present in Table 8.11 are not considered ecologically important, and will not be discussed further.

8.163 Significance of effect given in Table 8.11 is based on details given in Appendix 8.8 and presumes no avoidance, mitigation, or compensation is implemented.

Table 8.11: important ecological features and their geographic importance

Important ecological feature	Legislation, policy	Geographic importance	Potential effects	Magnitude of change	Sensitivity of receptor	Significance of effect
Statutory designated sites						
Deben Estuary Ramsar and SPA Alde-Ore Estuary Ramsar and SPA Stour and Orwell Estuaries Ramsar and SPA Sandlings SPA	Habitat Regulations 2017	International	The designated sites listed are scoped in within the Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy (Hoskin et. al., 2019) as being at risk from increasing visitation pressure resulting from increasing residential development. Pressure is considered to include disturbance to breeding, migratory, and wintering birds (leading to reduced feeding time, fitness, and breeding and survival success) and nutrient enrichment via dog walking.	A separate shadow Habitat Regulations Assessment (sHRA), or report to inform an Appropriate Assessment by the competent authority, will be required to characterise and detail the potential effects of the proposed development, alone and in combination with other developments, on these internationally designated sites. Any necessary avoidance, mitigation, or compensation measures will be set out in the sHRA or in a report to inform an Appropriate Assessment. The Suffolk Recreational Avoidance and Mitigation Strategy (RAMS) includes a provision for financial contributions from residential developments to mitigate pressure on internationally designated sites, which will likely be one of the mitigation options recommended in the sHRA or report to inform an Appropriate Assessment.		
Orfordness-Shingle Street SAC	Habitat Regulations 2017	International	This designated site is scoped in within the Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy as being at risk from increasing visitation pressure with main risks being trampling of sensitive shingle vegetation and nutrient enrichment from dog walking.			
Alde-Ore & Butley Estuaries SAC	Habitat Regulations 2017	International	This designated site is scoped out of the Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy as it is considered to be not at risk from public visitation pressure.	Negligible	Medium	No Significance

Important ecological feature	Legislation, policy	Geographic importance	Potential effects	Magnitude of change	Sensitivity of receptor	Significance of effect
Deben Estuary SSSI Orwell Estuary SSSI	WCA 1981	National	These SSSI are constituent components of the above listed Deben Estuary Ramsar and SPA, and Stour and Orwell Ramsar and SPA. Potential effects are as listed for those internationally designated sites.	As these SSSI are constituent components of the Deben Estuary SPA and Ramsar and the Stour and Orwell Estuaries SPA and Ramsar, potential effects alone and in combination with other developments on these SSSI will be assessed within the separate sHRA. Any necessary avoidance, mitigation, or compensation measures will be set out in the sHRA.		
Landguard Common SSSI	WCA 1981	National	<p>Potential for increased recreational pressure from increased residential population causing disturbance to, and reduction in fitness and survival rates of, breeding and migratory, bird assemblages.</p> <p>Recreational pressure may also potentially cause trampling and damage to rare botanical species, though this has recently been brought under control through installation of a boardwalk at the SSSI.</p> <p>However, the presence of a staffed visitor centre and designated dogs-on-short-leashes-only areas with dog waste bins will further reduce recreational pressure on the site from nearby developments.</p>	Negligible	High	Minor

Important ecological feature	Legislation, policy	Geographic importance	Potential effects	Magnitude of change	Sensitivity of receptor	Significance of effect
Non-statutory designated sites						
Kings Fleet CWS	East Suffolk Council Local Plan	Local	Potential for increased recreational pressure from increased residential population causing disturbance to, and reduction in fitness and survival rates of, breeding bird assemblages. Additional risk of increased nutrification via dog walking.	Low	Medium	Minor to Moderate
Felixstowe Ferry CWS	East Suffolk Council Local Plan	Local	Potential for increased recreational pressure from increased residential population causing disturbance to, and reduction in fitness and survival rates of, breeding bird assemblages and reptile populations. Additional risk of increased nutrification via dog walking.	Low	Low	Minor
Habitats on site						
h2a – Hedgerow (priority habitat)	NERC Act 2006	Local	Minor loss of ~13 m of east boundary hedgerow (priority habitat).	Low	Low	Minor
Species on site						
Reptiles	WCA 1981 (Sch. 5) NERC Act 2006	Local	Permanent habitat loss.	Negligible	Low	No Significance
			Injury and / or death of individuals during habitat clearance.	Low	Low	Minor
Breeding birds	WCA 1981 WCA 1981 (Sch. 1) BoCC Red/Amber Birds Directive Annex I	Local	Loss of breeding and nesting habitat.	Negligible	Low	No Significance
			Injury and / or death of individual breeding birds and dependent chicks, and / or damage and destruction of nests and eggs during vegetation clearance.	Medium	Medium	Moderate

Important ecological feature	Legislation, policy	Geographic importance	Potential effects	Magnitude of change	Sensitivity of receptor	Significance of effect
Breeding Skylark	WCA 1981 BoCC Red List NERC Act 2006	Local	Injury and / or death of individual breeding birds and dependent chicks, and / or damage and destruction of nests and eggs during vegetation clearance.	Medium	Medium	Moderate
			Loss of one breeding territory (confirmed through 2022 breeding bird surveys).	Low	Medium	Minor to Moderate
Wintering birds	BoCC Red/Amber	Not important at a Local level	Loss of foraging habitat for wintering bird species.	Negligible	Low	No Significance
Foraging and Commuting Bats	Habitat Regulations 2017 NERC Act 2006	Local	Loss of commuting and foraging habitat.	Negligible	Medium	No Significance
			Disturbance due to increased lighting (no lighting plan is available therefore it is assumed there will be no change to lighting levels. If this changes reassessment will be necessary).			
Badger	Protection of Badgers Act 1992	Not important at a Local level	Loss of foraging habitat.	Low	Low	Minor
			Damage or destruction of setts newly created between the time of surveys and works commencing on site.	Medium	Medium	Moderate
Hedgehog	NERC Act 2006	Local *	Loss of refuge, dispersal, and foraging habitat.	Negligible	Low	No Significance
			Injury and / or death of individuals during vegetation clearance.	Low	Low	Minor
Brown hare	NERC Act 2006	Not important at a Local level	Loss of arable foraging and breeding habitat.	Negligible	Low	No Significance
			Injury and / or death of leverets and adults during habitat clearance.	Low	Low	Minor

* Based on severe declines (>50%) in hedgehog numbers in rural areas of the UK over the past two decades.

(c) Avoidance

Statutory designated sites

Internationally designated sites

- 8.164 A separate shadow Habitat Regulations Assessment (sHRA) will be required to characterise and detail the potential effects of the proposed development, alone and in combination with other developments, and the magnitude thereof on the Deben Estuary Ramsar and SPA, Alde-Ore Estuary Ramsar and SPA, Stour and Orwell Estuaries Ramsar and SPA, Sandlings SPA, and Orfordness-Shingle Street SAC internationally designated sites. Any necessary avoidance measures will be set out in the sHRA. The Suffolk Recreational Avoidance and Mitigation Strategy (RAMS) includes a provision for financial contributions from residential developments to mitigate pressure on internationally designated sites, which will likely be the mitigation option recommended in the sHRA. The Suffolk RAMS financial contribution does not wholly absolve developers of mitigation responsibilities, they are still expected to provide some greenspace on-site and to encourage use of local walking routes.

Deben Estuary SSSI and Orwell Estuary SSSI

- 8.165 As constituent components of the Deben Estuary SPA and Ramsar and the Stour and Orwell Estuaries SPA and Ramsar, potential effects alone and in combination with other developments on the Deben Estuary SSSI and the Orwell Estuary SSSI and the magnitude thereof will be assessed within the separate sHRA. Any necessary avoidance measures will be set out in the sHRA.

Landguard Common SSSI; Kings Fleet CWS; and Felixstowe Ferry CWS

- 8.166 Avoidance of impacts from increased recreational pressure on the Landguard Common SSSI and Kings Fleet and Felixstowe Ferry County Wildlife Sites is recommended to take the form of development design amendment to include the following features on site, in accordance with guidance (East Suffolk District Council, 2022):

- High-quality, informal, semi-natural areas;
- Circular dog walking routes of 2.7 km within the site and/or with links to surrounding Public Rights of Way (PRoW);
- Dedicated 'dogs-off-lead' areas;
- Signage/information leaflets to householders to promote these areas for recreation;
- Dog waste bins; and
- A commitment to the long term maintenance and management of these provisions.

- 8.167 If provision of the above to the satisfaction of the East Suffolk Council is not achievable, then partial provision of the above measures in combination with mitigation outlined in Paragraph 8.174 below may be considered sufficient.

Habitats on site

Hedgerow (priority habitat)

- 8.168 Length of hedgerow to be removed will be minimised insofar as possible within the scheme design to avoid unnecessary hedgerow loss. Mitigation against damage to retained hedgerows should be implemented. Compensation will be required.

Species on site

Reptiles and hedgehog

- 8.169 Clearance of hedgerow and marginal grassland habitats will be minimised insofar as possible through the scheme design, and should only take place between April and September, avoiding the hibernation period of widespread reptiles and hedgehog.
- 8.170 Further mitigation will be required.

Nesting birds

- 8.171 Clearance of arable crop and hedgerow should take place between September to February only in order to avoid the nesting bird season (March to August inclusive). If this is not feasible, mitigation will be required.

Badger

- 8.172 Retention of boundary hedgerows and grassland margins will avoid the loss of these foraging habitats. Risk of damage to any newly created setts and loss of arable crop as foraging habitat and will require mitigation and compensation.

Brown hare

- 8.173 Clearance of arable crop and grassland margins should avoid the brown hare breeding season (February to September). If this is not feasible, mitigation will be required.

(d) Mitigation

Designated sites

Internationally designated sites

- 8.174 A separate shadow Habitat Regulations Assessment (sHRA) will be required to characterise and detail the potential effects of the proposed development, alone and in combination with other developments, and the magnitude thereof on the Deben Estuary Ramsar and SPA, Alde-Ore Estuary Ramsar and SPA, Stour and Orwell Estuaries Ramsar and SPA, Sandlings SPA, and Orfordness-Shingle Street SAC internationally designated sites. Any necessary mitigation measures will be set out in the sHRA.

Deben Estuary SSSI and Orwell Estuary SSSI

- 8.175 As constituent components of the Deben Estuary SPA and Ramsar and the Stour and Orwell Estuaries SPA and Ramsar, potential effects alone and in combination with other developments on the Deben Estuary SSSI and the Orwell Estuary SSSI and the magnitude thereof will be assessed within the separate sHRA. Any necessary mitigation measures will be set out in the sHRA.

Landguard Common SSSI; Kings Fleet SSSI CWS; and Felixstowe Ferry CWS

- 8.176 If recommended avoidance measures as per part (c) are not fully achievable, then additional mitigation measures could include:
- Provision of leaflets and signage to new homeowners and on the site to encourage residents to use the provided recreational space and footpaths available locally; and
 - A financial contribution to Landguard Common SSSI for employment of a parking warden to help management visitor numbers.

Habitats on site

Hedgerow (priority habitat)

- 8.177 Retained hedgerow should be protected from accidental damage with temporary (e.g. Heras) fencing positioned ≥ 1 m from the hedgerow base to protect root stock. Details of mitigation should be set out in a separate Construction Environmental Management Plan (CEMP).

*Species on site**Reptiles and hedgehog*

- 8.178 Clearance of hedgerow and grassland habitats should be undertaken via a two-stage cut in order to reduce risk of injury and / or death of widespread reptiles and hedgehog. This should be implemented as:
- Habitats should be inspected by an Ecological Clerk of Works (ECoW) before strimming / cutting;
 - Grassland and hedgerow should be cut no lower than 150 mm and 300 mm above ground level respectively;
 - The area should be re-checked by the ECoW;
 - Remaining vegetation can be cut to ground level following ECoW approval.
- 8.179 Any widespread reptiles or hedgehog will be moved by the ECoW to an area of retained habitat.

Nesting birds

- 8.180 If clearance of hedgerow and arable crop must take place during breeding bird season, an ECoW must be present to conduct pre-work checks for breeding birds within 24 hours prior to habitat clearance. Clearance should only be undertaken under ECoW supervision following written approval.
- 8.181 If any breeding or nesting birds are located, a minimum 5 m radius buffer (or larger, at the ECoW's discretion, especially for any Schedule 1 listed species) will be implemented to protect the nest until young have fledged.
- 8.182 Retained habitats should be protected with temporary (e.g. Heras) fencing for the duration of the construction phase to protect any species that may use the habitat during that time.
- 8.183 Details of mitigation should be set out in a CEMP.

Badger

- 8.184 A pre-commencement site walkover should be undertaken by an ecologist immediately prior to work commencing to check for new signs of badger sett building activity. Any setts found should be demarked on the ground and on site plans with a 30 m exclusion buffer. Advice should be sought from an ecologist on how to proceed.

Brown Hare

- 8.185 Arable crop clearance between February and September should be proceeded by a walkover by an ECoW to flush brown hare and visually search for any forms with dependent leverets present. If any dependent leverets are located, a 5 m no-works buffer should be established and demarked on the ground (using hazard tape or similar) and on-site plans, until young are confirmed to have left the form (four weeks post parturition).

(e) Residual effects

Designated sites

Internationally designated sites

- 8.186 Pending findings of the sHRA and implementation of any prescribed avoidance and / or mitigation measures set out therein, it is anticipated that there will be no residual effects upon internationally designated sites.

Deben Estuary SSSI and Orwell Estuary SSSI

- 8.187 Pending findings of the sHRA and implementation of any prescribed avoidance and / or mitigation measures set out therein, it is anticipated that there will be no residual effects upon Deben Estuary SSSI and Orwell Estuary SSSI.

Landguard Common SSSI; Kings Fleet SSSI CWS; and Felixstowe Ferry CWS

- 8.188 With prescribed avoidance and mitigation measures implemented, there will be no significant residual effects anticipated from the proposed development on Landguard Common SSSI or the County Wildlife Sites.

Habitats on site

Hedgerow (priority habitat)

- 8.189 With prescribed avoidance and mitigation measures implemented, there will be a minor residual effect upon hedgerow (priority habitat) requiring on-site compensation.

Species on site

Nesting birds

- 8.190 With prescribed avoidance and mitigation measures implemented, there will be a minor residual effect upon breeding skylark requiring off-site compensation.

Badger

8.191 Compensation for loss of arable crop foraging habitat will be required.

(f) Cumulative effects

8.192 The cumulative impact assessment of this development was considered in combination with the developments highlighted in Section 3.3 as well as any other significant and relevant (e.g. excluding small scale developments, minor household applications, Tree Protection Order applications, and refused applications where the applicant has not submitted an appeal) applications within the past two years within 1 km of the site. Relevant findings are given in Table 8.12 below:

Table 8.12: cumulative impact assessment search results.

Name	Description	Date received	Distance from site	Reference number	Outcome
Land at Candlet Road (North Felixstowe Garden Neighbourhood, SCLP 12.3)	Up to 560 dwellings, Local Community Centre, a 60 bedroom extra care home and 50 assisted living units, two small business units, and open space provision with associated infrastructure	16.03.2015	0.746 km	DC/15/1128/OUT	Refused – later allowed with conditions following appeal
Laureate Fields, Ferry Road (Land west of Ferry Road)	195 residential units	17.10.2013	0.007 km	DC/13/3069/OUT DC/18/1993/FUL	Permitted
	Additional two residential units on site	22.06.2022		DC/22/2295/FUL	Awaiting decision
Land north of Walton High Street	385 residential units	05.07.2016	1.882 km	DC/16/2778/OUT	Permitted
Area on Beach, Cliff Road	Formation of 18 new beach hut sites	25.11.2021	0.829 km	DC/21/5102/FUL	Permitted
Felixstowe Ferry Golf Club, Ferry Road	Demolition of existing clubhouse and shop, construction of new clubhouse and five detached dwellings	19.12.2019	0.820 km	DC/19/5049/FUL	Permitted

8.193 Where available, the Decision Notice, Design & Access statement, and Ecology report for the above applications were reviewed and results are summarised below.

Land at Candlet Road (North Felixstowe Garden Neighbourhood)

- 8.194 A 2015 application for this development was refused by the Suffolk Coastal District Council (now East Suffolk district Council) in March 2015 (Suffolk Coastal District Council, 2015). Following appeal, the Secretary of State overturned this decision and granted planning permission in August 2017 (Stasiak, 2017). This site is set within the North Felixstowe Garden Neighbourhood (SCLP12.3) allocated land so makes up a portion of the allocated housing under that policy.
- 8.195 The Preliminary Ecological Appraisal Report by Cotswold Wildlife Surveys (2014a) concluded that the majority of the site was covered with heavily grazed improved grassland and amenity grassland, and has limited value for reptiles, nesting birds, brown hare, and foraging badger, while Japanese knotweed (*Fallopia japonica*) was found on site.
- 8.196 Buildings on site were not subject to Preliminary Roost Assessment for bats, therefore suitability of these building and potential impacts on bats has not been assessed, and no separate bat survey report is available.
- 8.197 A separate great crested newt survey report (Cotswold Wildlife Surveys, 2014b) for presence / likely-absence surveys of three ponds on site and two ponds within 500 m of the site concludes that one of five ponds supports smooth newt (*Lissotriton vulgaris*) while none of the five ponds support great crested newt.
- 8.198 No Ecological Impact Assessment or ES Chapter for Biodiversity and Ecology appears to have been submitted as part of the outline application and impacts on biodiversity are not addressed within the Ecological Impact Assessment Screening Report available on the public portal.
- 8.199 The search radius for statutory and non-statutory designated sites within the Preliminary Ecological Appraisal Report was restricted to a 1 km buffer of the site boundary, rather than the standard Zones of Influence as given in Section 5.3 of this report (including the 13 km search area required under Suffolk RAMS). Due to the limited search area used, the report found none of the statutory sites which are known to be present in the region and no impact assessment of the development on these sites or mitigation recommendations for indirect impacts (e.g. recreational pressure) was undertaken. Therefore, a search for designated sites within appropriate Zones of Influence of the Candlet Road development was undertaken on the 6th September 2022, with relevant designated sites listed below:

- Stour and Orwell Estuaries SPA and Ramsar;
- Deben Estuary SPA and Ramsar;
- Sandlings SPA;
- Alde-Ore Estuary SPA and Ramsar;
- Orfordness-Shingle Street SAC;
- Hamford Water SPA (Using an 8 km search area, does not include Hamford Water SAC and Ramsar);
- Deben Estuary SSSI;
- Orwell Estuary SSSI;
- Harwich Foreshore SSSI; and
- Landguard Common SSSI.

8.200 A separate Habitats Regulations Assessment document (Cotswold Wildlife Surveys, 2015) as been submitted which assesses impacts of the Candlet Road development on the Deben Estuary SPA and Ramsar site only, as the nearest internationally designated site. This document concludes that the proposed Candlet Road development will have a negligible impact on Deben Estuary SPA and Ramsar from increased population and recreational pressure due to the distance of Deben Estuary from the application site (2.4 km) and recommends no mitigation is necessary.

8.201 Given that the Land off Ferry Road development assessed herein is likely able to avoid and / or mitigate any adverse effects on internationally designated sites within its Zol (to be detailed in the separate sHRA), it is likely that there will be no cumulative effect between this development and the Candlet Road development. The finding of the Candlet Road HRA that there will be a negligible effect on the Deben Estuary SPA and Ramsar further supports this finding.

Laureate Fields, Ferry Road (Land west of Ferry Road)

8.202 This site is located immediately adjacent the Ferry Road application site, to the west of Ferry Road.

8.203 The Extended Phase I Habitat Survey Report by Southern Ecological Solutions (2011) for this site concludes that the site has low ecological value, being comprised of predominately arable crop and 'improved' grassland. The report recommends further badger and breeding bird surveys. Two badger latrines are noted on the west side of the site, with no setts found. The granted Decision Notice (dated 17.10.2013) requires a badger survey and report be submitted under Condition 10, though this is not publicly available and it is not clear whether this has been undertaken. No breeding bird survey report appears to have been submitted to the public portal.

- 8.204 The desktop study aspect of the Extended Phase I Habitat Survey Report uses a 3 km Zol for statutory and non-statutory designated sites, rather than the standard Zones of Influence as given in Section 5.3 of this report (including the 13 km search area required under Suffolk RAMS). Therefore the report picks up on local County Wildlife Sites and the Deben Estuary SPA and Ramsar site, but not other internationally designated sites in the region.
- 8.205 A Habitat Regulations Assessment document by Southern Ecological Solutions (2013) for the site further assessed impacts of recreation from the development on statutory sites within 5 km of the site boundary, including:
- Stour and Orwell Estuaries SPA and Ramsar;
 - Deben Estuary SPA and Ramsar;
 - Stour Estuary SSSI;
 - Orwell Estuary SSSI;
 - Deben Estuary SSSI; and
 - Landguard Common SSSI.
- 8.206 The Habitat Regulations Assessment assesses that there is no likely direct significant effect on either Stour and Orwell Estuaries SPA and Ramsar or Deben Estuary SPA and Ramsar sites, as the development site is not suitable for use by any of the bird species for which these internationally designated sites are notified. Effects on the individual SSSI listed above was not assessed.
- 8.207 Potential indirect effects of the developments on these sites are assessed, with particular focus on the effect of recreational dog walking. The assessment concludes that, due to the anticipated increase in visitor numbers from the proposed development being <0.02%, the development site being 1.6 km and 5.8 km from Deben Estuary and Stour and Orwell Estuaries, respectively, and the presence of alternative recreational space in the region, no significant impact on the internationally designated sites is anticipated from the proposed development alone or in- combination with other developments.
- 8.208 Based on this assessment and the likelihood that the Ferry Road development assessed herein can mitigate indirect adverse impacts on the nearby internationally designated sites via a financial contribution to the Suffolk RAMS with no residual effects, no cumulative impact is anticipated between these two developments based on available information.
- 8.209 Given that the Land off Ferry Road development assessed herein is likely able to avoid and / or mitigate any adverse effects on internationally designated sites within its Zol (to be detailed in the separate sHRA), it is likely that there will be no cumulative effect between this development and the Laureate Fields development. The finding of the Laureate Fields HRA that there will be a negligible effect on the Stour and Orwell Estuaries SPA and Ramsar or the Deben Estuary SPA and Ramsar further supports this finding.

Land north of Walton High Street

- 8.210 An Ecological Impact Assessment report by Aspect Ecology (2016a) includes detail of the Phase I habitat survey and species specific surveys for bats, badger, barn owl (*Tyto alba*), and reptiles undertaken between 2010 and 2015. The report concludes that the majority of the application site is arable land with buildings and hardstanding, scrub, and grassland all of negligible or low ecological value. Roosting bats (brown long-eared (*Plecotus auritus*) and Barbastelle (*Barbastella barbastellus*) were confirmed within two buildings, though the Barbastelle roost building subsequently burned down the year after the survey (Aspect Ecology, 2016b). Badger (three subsidiary or outlier setts on site) and barn owl (pellets and visual records of owl within the two buildings recorded as bat roosts, one of which subsequently burned down in 2016) were also recorded on site with mitigation recommendations given. The site is also assessed as having potential to support modest assemblages of common and farmland birds.
- 8.211 The report assesses potential impacts of the proposed development on Stour and Orwell Estuaries SPA and Ramsar, and Deben Estuary SPA and Ramsar. It concludes that due to the distance of the development site from these designated sites, the presence of extensive arable land between the two, and the lack of suitable habitat on the development site for the bird species for which the designated sites are notified, there is no anticipated direct impact from the development on these designated sites. Other designated sites are not assessed.
- 8.212 The report also assesses potential indirect impacts of the development on the above SPA and Ramsar sites, focusing on recreational pressure increases as a result of the population increase, from walkers and dog walkers in particular. The assessment concludes that, due to the anticipated increase in visitor numbers from the proposed development being <0.04%, the development site being 2.2 km from the Stour and Orwell Estuaries and 3.5 km from Deben Estuary, and the presence of alternative recreational space in the region, there is a negligible impact anticipated on the internationally designated sites from the proposed development either alone or in combination with other developments.
- 8.213 Given that the Land off Ferry Road development assessed herein is likely able to avoid and / or mitigate any adverse effects on internationally designated sites within its Zol (to be detailed in the separate sHRA), it is likely that there will be no cumulative effect between this development and the Land north of Walton High Street development. The finding of the Walton High Street HRA that there will be a negligible effect on the Stour and Orwell Estuaries SPA and Ramsar or the Deben Estuary SPA and Ramsar further supports this finding.

Area on Beach, Cliff Road

- 8.214 The Preliminary Ecological Appraisal Report by Suffolk Wildlife Trust Trading (2021) concluded that the habitat on site (vegetated shingle, non-priority habitat) was of minor ecological value and that there would be a minor negative (but reversible due to the nature of the huts) impact on this habitat. Due to distance from the site, there are no anticipated impacts on designated sites. Off-site Biodiversity Net Gain was recommended via creation of vegetated shingle elsewhere in the locality by fencing off areas from public access and damage.
- 8.215 Given that the Land off Ferry Road development assessed herein is likely able to avoid and / or mitigate any adverse effects on internationally designated sites within its Zol (to be detailed in the separate sHRA), and that the Cliff Road project does not represent a permanent increase in local population, it is likely that there will be no cumulative effect between this development and the Cliff Road beach hut development.

Felixstowe Ferry Golf Club

- 8.216 The Preliminary Ecological Appraisal Report by Geosphere Environmental (2019a) reported suitability of the site for foraging badger, nesting birds, reptiles, and hedgehog. Due to the nature of the proposal and proximity to internationally designated sites payment under the Suffolk RAMS would be required. Further surveys for bats were recommended and reported separately in the Bat Roost Survey Report (Geosphere Environmental, 2019b) which found no bat roosts within buildings proposed for demolition. Ecological enhancements in the form of native landscaping, bat and bird boxes, and log piles were also recommended.
- 8.217 Given that the Land off Ferry Road development assessed herein is likely able to avoid and / or mitigate any adverse effects on internationally designated sites within its Zol (to be detailed in the separate sHRA), it is likely that there will be no cumulative effect between this development and the Ferry Road Golf Club development. That the Ferry Road Golf Club development will mitigate their impacts on nearby internationally designated sites via payment to the Suffolk RAMS further supports this finding.

(g) Compensation

Designated sites

- 8.218 No compensation required assuming the separate sHRA can effectively avoid or mitigate impacts of the development on designated sites.

*Habitats on site**Hedgerow (priority habitat)*

- 8.219 Compensation should be implemented via planting of existing hedgerow gaps and planting new hedgerow length (~40 m) along the south-east site boundary along Ferry Road, south of the Ranson Road junction).
- 8.220 New hedgerow planting should take the form of staggered double row planting of native species (at least five species in groups of 3-4 conspecifics) in biodegradable guard tubes.
- 8.221 Hedgerow planting should be allowed to grow to maturity (~5 years) before being managed by trimming every two years (or alternating sides annually) to maximise fruit production. Guard tubes should be removed and composted when plants outgrow them. Any plant to die within the first five years should be replaced like-for-like.
- 8.222 Hedgerow creation and management could be guided and conditioned through a Landscape and Ecology Management Plan (LEMP).

*Species on site**Breeding birds*

- 8.223 Due to the anticipated loss of one skylark breeding territory from the proposed development, it will be necessary to compensate through creation of two skylark foraging plots on nearby arable land. Plots should be created and maintained as per RSPB guidance (http://www.sdfarmbirds.com/_app_/resources/documents/www.sdfarmbirds.com/unused/rspb_skylark_plots.pdf) for a minimum of five years post-development completion. Land need not be purchased but management could be secured with current landowner(s) in exchange for financial contribution.

Badger

- 8.224 The on-site habitat creation and soft landscaping with diverse native species planting and seed mixtures will compensate for the loss of badger foraging habitat from the removal of arable crop.

(h) Securement of mitigation and compensation for the scheme

- 8.225 Table 8.13 shows the avoidance, mitigation or compensation measures required for each important ecological and suggests possible ways in which these could be achieved.

Table 8.13: recommendations for securing ecological avoidance, mitigation and compensation

Important ecological feature	Recommendation(s)	Securement
<i>Designated sites</i>		
<p>Deben Estuary Ramsar and SPA (includes Deben Estuary SSSI)</p> <p>Alde-Ore Estuary Ramsar and SPA</p> <p>Stour and Orwell Estuaries Ramsar and SPA (includes Orwell Estuary SSSI)</p> <p>Sandlings SPA</p> <p>Orfordness-Shingle Street SAC</p>	<p>Any necessary avoidance, mitigation, or compensation measures, and recommendations for securement, will be set out in the separate sHRA or report to inform an Appropriate Assessment by the competent authority. The Suffolk Recreational Avoidance and Mitigation Strategy (RAMS) includes a provision for financial contributions from residential developments to mitigate pressure on internationally designated sites, which will likely be one of the mitigation options recommended in the sHRA, or report to inform an Appropriate Assessment, and could be secured through a Section 106 agreement. The Suffolk RAMS financial contribution does not wholly absolve developers of mitigation responsibilities, they are still expected to provide some greenspace on-site and to encourage use of local walking routes.</p>	
<p>Landguard Common SSSI</p>	<p>Provision of on-site alternative recreational greenspace and dog walking routes.</p> <p>Leaflets and signage for new homeowners directing towards local walking routes.</p> <p>Financial contribution to Landguard Common SSSI for employment of a parking warden.</p>	<p>Bespoke Planning Condition. Section 106 Agreement.</p>
<i>Non-statutory designated sites</i>		
<p>Kings Fleet CWS</p> <p>Felixstowe Ferry CWS</p>	<p>Provision of on-site alternative recreational greenspace and dog walking routes.</p> <p>Leaflets and signage for new homeowners directing towards local walking routes.</p>	<p>Bespoke Planning Condition. Section 106 Agreement.</p>

<i>Habitats on site</i>		
h2a – hedgerow (priority habitat)	Protection of retained hedgerow.	British Standard 42020:2013 – D.3.9; Protective measures during construction.
	Compensatory native species-rich hedgerow planting.	British Standard 42020:2013 – D.2.3; Where native species are required as part of the design
	Production of a LEMP to manage habitat creation and management.	British Standard 42020:2013 – D.4.5; Landscape and Ecology Management Plan
<i>Species on site</i>		
Reptiles	Provision of on-site ECoW during vegetation clearance.	British Standard 42020:2013 – D.3.8; Securing on-site ecological expertise during construction.
	Protection of retained habitats with temporary fencing.	British Standard 42020:2013 – D.3.9; Protective measures during construction.
Breeding birds	Avoidance of habitat clearance during breeding and nesting season.	British Standard 42020:2013 – D.3.2; Protection of breeding birds during construction.
	Protection of retained habitats with temporary fencing.	British Standard 42020:2013 – D.3.9; Protective measures during construction.
Breeding Skylark	Provision of two skylark plots on nearby arable land to be managed for at least five years.	Section 106 Agreement.
Foraging and Commuting Bats	Submission of a sensitive lighting design strategy (if assumption that light levels will not increase above baseline is incorrect).	British Standard 42020:2013 – D.3.5 Lighting design strategy for light-sensitive biodiversity.
Hedgehog	Provision of on-site ECoW during vegetation clearance.	British Standard 42020:2013 – D.3.8; Securing on-site ecological expertise during construction.
	Protection of retained habitats with temporary fencing.	British Standard 42020:2013 – D.3.9; Protective measures during construction.
Badger	Native-species rich landscaping and grassland seed mixture for compensatory foraging habitat.	British Standard 42020:2013 – D.4.5; Landscape and Ecology Management Plan
	Provision of on-site ECoW during vegetation clearance.	British Standard 42020:2013 – D.3.8; Securing on-site ecological expertise during construction.
Brown Hare	Provision of on-site ECoW during vegetation clearance.	British Standard 42020:2013 – D.3.8; Securing on-site ecological expertise during construction.
<i>Habitats and species on site</i>		
All of the Above	Securement of construction phase precautionary measures including details of protective fencing, ECoW provision requirements, and good working practices via a Construction Environmental Management Plan (CEMP).	British Standard 42020:2013 – D.4.1; Construction environmental management plans.

(i) Enhancement opportunities

8.226 With implementation of the above avoidance, mitigation, and compensation recommendations there should be no significant residual impact on ecology from the proposed development. Biodiversity Metric calculations should be undertaken to calculate change in biodiversity units. Recommendations for potential ecological enhancements are outlined below. These have been agreed with the client and should be detailed in a separate LEMP, which could form a condition of planning permission.

- Biodiversity Metric calculations of baseline habitats and recommendations on delivering $\geq 10\%$ Biodiversity Net Gain on site could be undertaken via a separate Biodiversity Net Gain plan.
- Native species-rich landscaping, to be specified within the LEMP, in order to achieve Biodiversity Net Gain requirements. This should include:
 - Native tree planting throughout the site;
 - Native species rich hedgerow planting throughout and around the site, including along the primary roadway and to demark private garden boundaries where space allows, and to demark the north-west greenspace area boundaries;
 - Use of native species-rich wildflower-rich grassland mixtures to enhance the existing grassland margins and create the north-east greenspace area;
 - Creation of a fenced wildlife pond and riparian area within the north-west greenspace area;
 - Use of native flowering lawn mixtures within private gardens and along road verges; and
 - Appropriate biodiversity focused habitat management of the above features within the LEMP.
- Use of any woody stems from the removed length of hedgerow to create stag beetle and hedgehog loggeries in the north-west greenspace and north-east site corner.
- Installation of 50 bird nesting boxes (e.g. Swift under-eave nest bricks) into new dwellings and on existing trees on site.
- Installation of 25 bat roosting boxes into new dwellings and on existing trees on site.
- Integration of 'hedgehog highway' gaps in any solid board fencing (<https://www.hedgehogstreet.org/help-hedgehogs/link-your-garden/>) with appropriate signage to allow hedgehog dispersal between private gardens.

(j) Monitoring

8.227 No ongoing monitoring of the site is considered necessary as part of the Environmental Impact Assessment. Further monitoring may be required separately as part of Biodiversity Net Gain and habitat management under the LEMP.

Conclusions

- 8.228 It is proposed to construct 150 new residential units at a 3.8 ha area of land off Ferry Road in north Felixstowe, which allocated under the Local Plan policy SCLP12.4. The East Suffolk Council has requested an Environmental Impact Assessment including Ecology and Biodiversity following an outline application for the development. A series of ecology surveys has been undertaken of 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), winter bird surveys, and breeding bird surveys. No other surveys were deemed necessary.
- 8.229 The desk study found that within the zones of Influence for the site are nine internationally designated sites, including Deben Estuary Ramsar and SPA, Alde-Ore Estuary Ramsar and SPA, Stour and Orwell Estuaries Ramsar and SPA, Sandlings SPA, Orfordness-Shingle Street SAC, and Alde-Ore & Butley Estuaries SAC, as well as three nationally designated sites including Deben Estuary SSSI, Orwell Estuary SSSI, and Landguard Common SSSI, and two non-statutory designated sites including Kings Fleet CWS and Felixstowe Ferry CWS.
- 8.230 The field surveys found the site to predominately comprise arable crop with a native hedgerow (priority habitat), modified grassland margins, and lines of trees around the site boundaries. 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. Both bird surveys found the site was not used by breeding, migratory, or wintering birds for which the nearby SPA and Ramsar sites are designated.
- 8.231 The impact assessment has found there will be likely significant effects upon several ecological features without mitigation, including Landguard Common SSSI, Kings Fleet and Felixstowe Ferry CWS, boundary hedgerows (priority habitats), widespread reptiles, breeding birds (including skylark), badger, hedgehog, and brown hare. With recommended avoidance, mitigation, and where necessary compensation measures, there should be no residual effects on any of these features.
- 8.232 A separate shadow Habitat Regulations Assessment, or report to inform an Appropriate Assessment by the competent authority, is recommended to assess potential indirect effects on internationally designated sites and their constituent SSSI's from the development and subsequent population increase. If necessary, any avoidance, mitigation, and / or compensation measures required should be recommended therein and the document read in conjunction with this ES Chapter.

- 8.233 Ecological enhancement opportunities outlined herein in agreement with the client, including installation of bat boxes, bird boxes, pond creation, and use of native species-rich soft landscaping, should be integrated into the scheme design to provide an overall benefit for biodiversity. It is recommended that this include calculations to target $\geq 10\%$ Biodiversity Net Gain using the DEFRA Biodiversity Metric 3.1.
- 8.234 It is recommended that a Construction Environmental Management Plan is produced to guide good working practices and mitigation during the construction phase of the scheme, while a Landscape and Ecology Management Plan should be produced to guide habitat creation and management on and off-site. The Landscape and Ecology Management Plan should include provision for Biodiversity Net Gain and details on Biodiversity Units provided by each proposed area of habitat creation. The lifetime of the plan should be subject to the time to habitat condition given by the DEFRA Biodiversity Metric 3.1.

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Appendices

- Appendix 8.1 Legislative protections
- Appendix 8.2 County Wildlife Site location plan
- Appendix 8.3 Desk study biological records
- Appendix 8.4 Site photographs
- Appendix 8.5 Habitat Condition Assessment sheets
- Appendix 8.6 Wintering bird survey results
- Appendix 8.7 Breeding bird survey results
- Appendix 8.8 Impact assessment and recommendations summary
- Appendix 8.9 Figures

9. Transport and Access

- 9.1 This chapter considers the potential environmental effects of the Project in relation to transport matters. It has been undertaken in accordance with EIA Regulations and Institute of Environmental Management and Assessment (IEMA) in their Guidelines for the Environmental Assessment of Road Traffic (1993).
- 9.2 It considers the environmental impact of the Project with regard to traffic, pedestrians, cycle movements and public transport. It does not cover junction capacity assessments, as these are dealt with in the Transport Assessment which was prepared by MLM dated February 2021 that was submitted as part of the planning application.

Legislation, policy and guidance

National policy – National Planning Policy Framework

- 9.3 The NPPF acknowledges the role of transport policies in facilitating sustainable development and contributing to wider sustainability and health objectives. Consequently, it advises local planning authorities to support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.
- 9.4 Key paragraphs relating to planning for new development are summarised below:
- 9.5 Under the plan-making framework, paragraph 17:
- “The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area. These strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. They can be contained in:*
- a) Joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies); and/or*
 - b) a spatial development strategy produced by an elected Mayor or combined authority, where plan-making powers have been conferred.”*
- 9.6 Paragraph 104 states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that:
- The potential impacts of development on transport networks can be addressed;
 - Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
 - The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and

- Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.

9.7 Paragraph 105 states:

“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

9.8 Paragraph 106 states that planning policies should:

- Be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
- Identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
- Provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans); and
- Provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements.

9.9 Paragraph 110 states that

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- *Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- *Safe and suitable access to the Site can be achieved for all users;*
- *The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
- *Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*

9.10 Paragraph 111 states:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

9.11 Paragraph 112 states, within the context mentioned in the previous paragraphs that applications for development should:

- Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- Create places that are safe, secure and attractive – which minimises the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- Allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

9.12 Paragraph 113 states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed

National policy – Local Transport Note 1/20

9.15 Department for Transport (DfT) Local Transport Note (LTN) 1/20 was published in July 2020 and provides guidance and good practice on the design of cycle infrastructure.

9.16 Section 3 provides guidance summarised from the Department’s Local Cycling and Walking Infrastructure Plans. Relevant paragraphs from Section 3 relating to cycle planning include:

- 9.17 Paragraph 3.1.3 deals with planning for cycling and states that such planning should be based around providing a network of on-and/or off-carriageway routes that are suitable for all abilities. Subject to topographical constraints, the aim is to create a densely spaced network (typically with 250m to 1km spacing between routes depending on the density of land use) so that all people can easily travel by cycle for trips within and between neighbourhoods. In addition to this there will be longer distance routes within the local network that may serve leisure, tourism and utility cycling.

Local policy – East Suffolk Council, Suffolk Coastal Local Plan (2020)

- 9.18 The Suffolk Coastal Local Plan adopted on the 23rd September 2020 provides context on community developments within the Suffolk coastal area up to 2036. Key transport related policies within this document include:

- 9.19 Policy SCLP7.1: Sustainable Transport

This policy states that development proposals should be designed from the outset to incorporate measures to encourage people to travel using non-car modes when accessing home, school, employment and facilities. Furthermore, it is stated that developments will be supported where:

- Any significant impacts on the highways network are mitigated;
- It is proportionate in scale to the existing transport network;
- All available opportunities to enable and support travel on foot, by cycle or public transport have been considered and taken;
- It is located close to, and provides safe pedestrian and cycle access to services and facilities;
- It is well integrated into and enhances the existing cycle network including the safe design and layout of new cycle routes and provision of covered, secure cycle parking;
- It is well integrated into, protects and enhances the existing pedestrian routes and the public rights of way network;
- It reduces conflict between users of the transport network including pedestrians, cyclists, users of mobility vehicles and drivers and does not reduce road safety; and
- The cumulative impact of the development will not create severe impacts on the existing transport network.

9.20 Policy SCLP7.2: Parking Proposals and standards

This policy states that the council will work with partners to ensure that vehicle parking provision is protected and managed to support the local economy and sustainable communities, and that proposals involving vehicle parking will be supported where they include:

- The provision of safe, secure, and convenient off-street parking of an appropriate size and quantity including addressing the need for parking or secure storage for cars, cycles and motorcycles, and where relevant, coaches and lorries;
- Opportunities to reduce the recognised problem of anti-social parking or potential problems that may arise which impacts the quality of life or vitality of an area for residents and visitors;
- Appropriate provision for vehicle charging points and ancillary infrastructure associated with the increased use of low emission vehicles.

9.21 Furthermore, it is stated that proposals will be expected to have regard to the parking standards contained in the Suffolk Guidance for Parking (including subsequent revisions), excluding the elements of the Guidance related to 'Residential Parking design', unless other local planning considerations indicate otherwise. Proposals should also accord with both the East Suffolk Area Parking Plan and the Suffolk Parking Management Strategy, or Neighbourhood Plans for the area where applicable.

Local policy –Suffolk County Council, Suffolk's Local Transport Plan (2011-2031)

9.22 Suffolk's Local Transport Plan was agreed by the County Council in 2011 and includes the following transport strategy aims that are relevant to the Project:

- Aiming to join up the main areas of economic activity – the town centre, seafront and Old Felixstowe.
- Working closely with the Local Planning Authority and Felixstowe Town Council to reduce traffic levels from new development.
- Introducing real time bus information in Felixstowe.
- Improve active travel infrastructure, in particular to fill in the missing links on walking and cycling routes.

Local policy – Suffolk County Council, Suffolk Green Access Strategy Public Rights of Way Improvement Plan 2020-2030

9.23 The Suffolk Public Rights of Way Improvement Plan provides direction on how Suffolk's public rights of way network is managed, maintained and improved. The plan complements existing strategies such as the Health and Wellbeing Strategy, Sustainable Modes of Transport Strategy, and the Growth Strategy and is to be implemented with internal and external stakeholders to collaboratively deliver outcomes and decisions for planning.

9.24 Section 3 of this document details the delivery plan that sets out objectives and actions to help improve green access infrastructure.

9.25 As part of the delivery plan within it is stated that:

- Where developments are significant, it is possible to obtain funding or to agree works with the developer to improve the network. This approach can create new routes, improve existing routes, or change the status of a route, for example upgrading a footpath to a bridleway.

9.26 Furthermore, in relation to Polices CS8 and DM44 as mentioned above, this delivery plan details specific related objectives and actions as shown in Table 9.1.

Table 9.1 Suffolk Green Access Strategy PROW Improvement Plan – Delivery Plan

Objective	Action
Item 2.1, Improving the network	
2.1.1 Make the network better for all users	Seek opportunities to enhance public rights of way, including new linkages and upgrading routes where there is a need, to Improve access for all and support healthy and sustainable access between communities and services. Funding to be sought through development and transport funding, external grants, other councils and partnership working.
Item 2.2, Developments	
2.2.1 Make the network better for all users	Where possible and appropriate, work with planners to enhance public rights of way as green corridors within new developments. Where this is not possible, seek the realignment of public rights of way within a green corridor that retains its integrity and links to the natural environment.
2.2.2 Make the network better for all users	Where relevant, seek the improvement and creation of new offsite public rights of way to link to other public rights of way or to features of interest.

Guidance and Industry Standards

9.27 The transport aspects of the Project have been undertaken in accordance with the standards and guidance contained in the following publications:

- Design Manual for Roads and Bridges (DMRB);
- Manual for Streets;
- Department for Transport Local Transport Note 1/20;
- Suffolk County Council – Suffolk Guidance for Parking (2019); and
- Department for Transport Gear Change – A bold vision for cycling and walking.

Methodology

Scope of the assessment

9.28 This chapter of the ES assesses the likely significant transport effects of the Project and is supported by more detailed analysis contained within the Transport Assessment submitted with the planning application.

9.29 The assessment is based on predicted transport conditions during the construction (and demolition) and operational phase of the Project and the associated environmental effects.

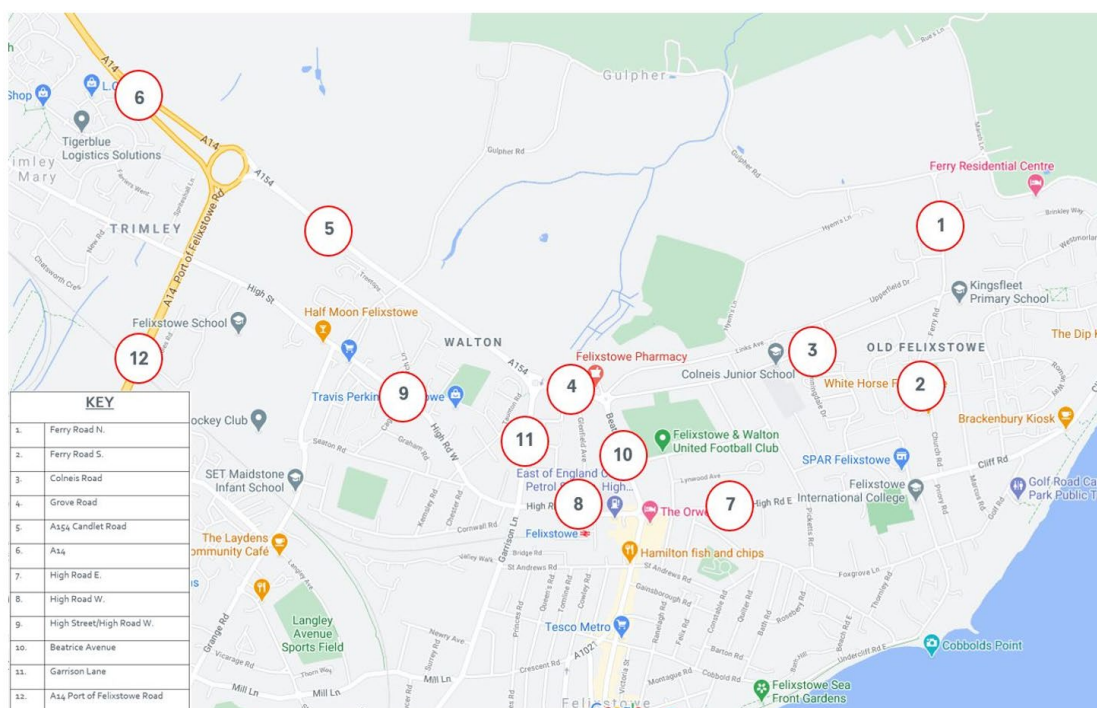
9.30 The chapter describes:

- the assessment methodology;
- the baseline conditions currently existing at the Site and in the surrounding area;
- the likely significant environmental effects;
- the mitigation measures required to prevent, reduce or offset any significant adverse effects;
- the likely residual effects after these measures have been employed; and
- the cumulative effects associated with the Project in combination with committed land use developments and transport infrastructure schemes.

Spatial Scope

- 9.31 The spatial extent of the assessment covers the town of Felixstowe. The key highway links that have been identified and assessed as part of this transport chapter are shown in Figure 9.1.

Figure 9.1: spatial extent of transport study area



- 9.32 Outside of this area, the additional traffic flows associated with the Project will be negligible both in the context of the number of trips and the percentage of existing flows.

Temporal Scope

- 9.33 The temporal scope of the assessment extends from the expected opening year of the Project (2024) to the end of the current local plan period (2036), beyond which there is a greater level of uncertainty surrounding the nature, scale and timing of future land use and transport infrastructure projects.
- 9.34 The assessment has also been structured to include temporary effects during construction and permanent effects during the operational phase of the Project.

Technical Scope

- 9.35 In terms of the technical scope, the guidelines suggest that a relevant area of influence for this ES Chapter should include highway links where traffic flows will increase by more than 30% or a sensitive area where traffic flows will increase by more than 10%.

Consultation

- 9.36 Pre-application discussions have been held with Suffolk County Council which have directed the scope of the Transport Assessment that has been prepared as a separate document and submitted as part of the planning application.
- 9.37 A Scoping Report was submitted to East Suffolk Council (ESC) at an early stage in the pre-application process which included a formal request for an EIA Scoping Opinion in accordance with Regulation 15 of the EIA Regulations. As part of this process, the key statutory and non-statutory consultees were consulted to review the proposed methodology and criteria for assessment. ESC subsequently issued its Scoping Opinion on 28th January 2022 commenting on the proposed scope and methodology of the topics for assessment within the EIA.

Method of Baseline Data Collection

- 9.38 Baseline conditions relevant to this assessment have been prepared on both a qualitative and quantitative basis. The following were carried out:
- Site visit;
 - Personal Injury Accident (PIA) data assessment;
 - Review of bus and national rail services;
 - Review of pedestrian routes, crossing facilities and local cycle network;
 - Pre-existing traffic data from Transport Assessments for nearby committed land use developments; and
 - Pre-existing traffic data from the Department for Transport website.

Assessment Methodology

- 9.39 This assessment has been undertaken in accordance with guidance given in the Institute of Environmental Assessment (Now the Institute of Environmental Management and Assessment) in their “*Guidance for the Environmental Assessment of Road Traffic*” (1993). Also used in the preparation of this assessment was the Environmental Impact Assessment “*A Guide to Good Practice and Procedures*” issued in June 2006 by the Department of Communities and the Local Government.

9.40 Baseline conditions on the adjacent road network have been established from a site visit; desktop research and pre-existing transport data available in the public domain. The assessment of potential impact has been undertaken by considering the Project with associated increase in traffic compared with baseline transport conditions. The assessment presented in this Chapter considers the impact of the Project on the following scenarios:

- 2024 Opening Year, Without Project (Do Nothing);
- 2024 Opening Year, With Project (Do Something);
- 2036 End of Local Plan Year, Without Project (Do Nothing); and
- 2036 End of Local Plan Year, With Project (Do Something).

9.41 Future background traffic growth on the surrounding highway network in 2024 and 2036 has been accounted for through use TEMPRO traffic growth factors as well as from committed development traffic flows derived from the associated Transport Assessments available in the public domain. This ensures a robust assessment. As well as building in background traffic growth using TEMPRO traffic growth factors, the assessment also explicitly takes account of and includes the following committed developments within the North Felixstowe Garden Neighbourhood masterplan area:

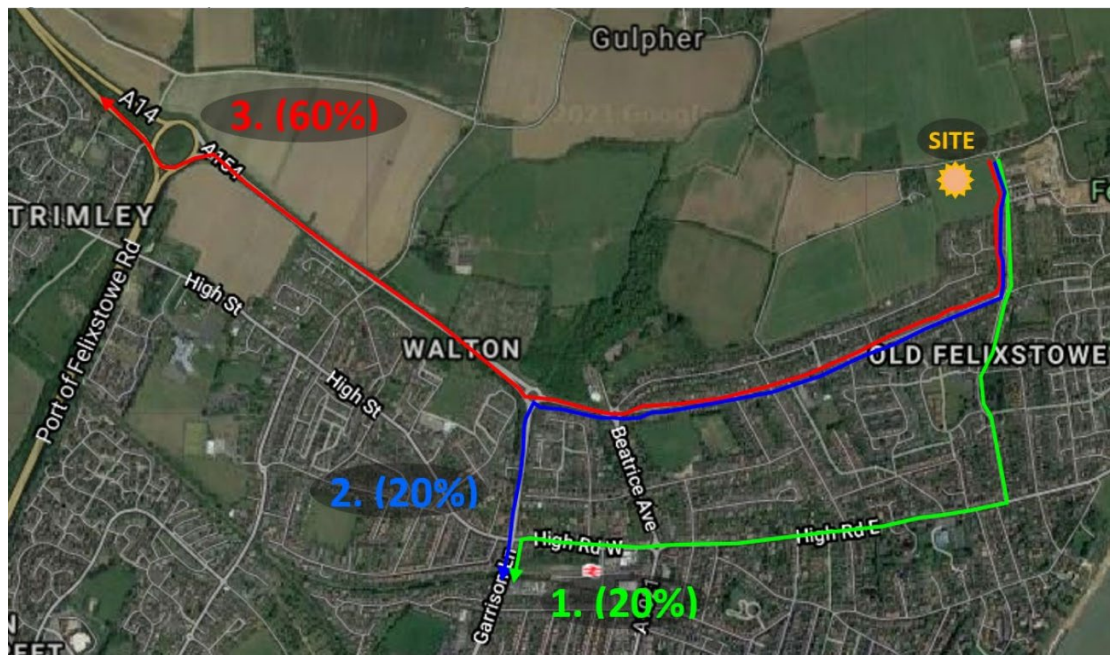
- Land North of Candlet Road: This site is owned by the Stennett family and is a consented development comprising up to 560 dwellings, 60 bed care home and 50 assisted living units (planning ref: DC/15/1128/OUT).
- Eastward Ho: This site is owned by East Suffolk Council (ESC) and has been identified as having the potential to accommodate around 550 dwellings and a new Primary School of 630 students – based on the current North Felixstowe masterplan.
- Trinity College Land: This site is owned by Trinity College Cambridge and could accommodate in the order of 550 dwellings, new Leisure Centre and Commercial Hub comprising local shops based on the current North Felixstowe masterplan.
- Adams Family Land: This site is owned by the Adams family and could accommodate in the order of 215 dwellings – based on the current North Felixstowe masterplan.

9.42 Other nearby developments that will also generate additional traffic movements on the highway network in Felixstowe have also explicitly been taken into account and included within the assessment:

- Land South of Candlet Road: This site is owned by Trinity College Cambridge and is also known as ‘Walton North’. The site has received planning consent for 385 dwellings (planning ref: DC/16/2778/OUT).

- Land West of Ferry Road: This site has received planning consent for 197 dwellings (planning ref: DC/16/3776/ARM). Construction of the development is underway.
- 9.43 The assessment is based on future year traffic flows that include both TEMPRO traffic growth as well as specific committed or proposed land use developments and is therefore considered very robust.
- 9.44 The 'With Project' (i.e. Do Something) assessment considers the likely effects of the Project against a future baseline scenario which assumes the implementation and operation of the committed developments.
- 9.45 The vehicle trip distribution and assignment used for this assessment is based on the trip distribution and assignment for the Project set out in the Transport Assessment agreed with Suffolk County Council, summarised below and presented in Figure 9.2:
- Colneis Road, A154 Candlet Road and A14 towards Ipswich: 60%
 - Colneis Road, Garrison Lane to Felixstowe town centre: 20%
 - Church Road, High Road and Garrison Lane to Felixstowe town centre: 20%

Figure 9.2: development traffic route assignment



Assessment Periods

- 9.46 The network AM and PM peak periods considered in this assessment are as follows:
- AM peak hour: 08:00 to 09:00hrs; and
 - PM peak hour: 17:00 to 18:00hrs.
- 9.47 These peak periods represent times when the local transport network is most heavily used, therefore providing a 'worst-case' scenario against which to assess the transport effects of the Project.

Survey Methodologies

- 9.48 The traffic assessment was based on the use of pre-existing traffic data available in the public domain derived from Transport Assessments for committed land use developments and publicly available traffic data from the Department for Transport website.
- 9.49 The assessment of non-car modes was based on the use of 2011 Census travel to work data for the zone 'Suffolk Coastal 013' in which the site is located.
- 9.50 The assessment of construction traffic and impacts was informed by pre-existing data relating to construction traffic movements associated with other residential developments of a similar scale.

Significance Criteria

- 9.51 The magnitude and significance of effects has been determined using the criteria set out in the IEMA Guidelines for the Environmental Assessment of Road Traffic 1993. The guidelines suggest that the assessment should:
- Rule 1 – include any highway links where the traffic flows or the number of HGVs will increase by more than 30%; or
 - Rule 2 – include any other specifically sensitive areas where traffic flows will increase by 10% or more.
- 9.52 Locations, groups and interests sensitive to changes in traffic flow are identified below – based on Page 17 of the IEMA's Guidelines for the Environmental Assessment of Road Traffic:
- People at home;
 - People in workplaces;
 - Sensitive groups, including children, elderly and disabled;
 - Sensitive locations, e.g. hospitals, churches, schools, historical buildings;
 - People walking;
 - People cycling;

- Open spaces, recreational spaces, shopping areas;
- Sites of ecological/nature conservation value; and
- Sites of tourist/visitor attraction.

9.53 Categories of sensitivity for different receptors have been defined from Table 3.2N of DMRB LA 104 Rev 1 “*Environmental Assessment and Monitoring*”. The categories of sensitivity and associated descriptions are presented in Table 9.2.

Table 9.2: environmental value (sensitivity) and descriptions

Value (Sensitivity) of Receptor / Resource	Typical Description
Very High	Very high importance and rarity, international scale and very limited potential for substitution.
High	High importance and rarity, national scale, and limited potential for substitution.
Medium	Medium or high importance and rarity, regional scale, limited potential for substitution.
Low	Low or medium importance and rarity, local scale.
Negligible	Very low importance and rarity, local scale.

9.54 Based on the local area around the Site, it is considered that all receptors would be either medium or low sensitivity due to their level of importance and regional or local scale.

9.55 Impacts are described as being either beneficial or adverse:

- Beneficial: meaning that the changes produce benefits in terms of transportation and access (such as reduction of traffic, travel time or patronage, or provision of a new service, access or facility); or
- Adverse: meaning that changes produce dis-benefits in terms of transportation and access (such as increase of traffic, travel time, patronage or loss of service or facility).

Assessment of Impact Magnitude

- 9.56 The magnitude of an impact is described as major, moderate, minor, negligible or no change and are based on judgements taking in to account the relevant information and guidance available including fear and intimidation thresholds and severance indicators from the IEMA Guidelines. The framework for assessing the magnitude of impacts is provided in Table 9.3 – which appears as Table 3.4N in DMRB's LA 104 'Environmental Assessment and Monitoring' Rev I.

Table 9.3: magnitude of impact and typical descriptions

Magnitude of Impact	Typical Criteria Descriptors
Major	<ul style="list-style-type: none"> Loss of resource and / or quality and integrity of resource; severe damage to key characteristics, features or elements (Adverse). Large scale or major improvement of resource quality; extensive restoration or enhancement; major improvement of attribute quality (Beneficial).
Moderate	<ul style="list-style-type: none"> Loss of resource, but not adversely affecting the integrity; partial loss of / damage to key characteristics, features or element (Adverse). Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality (Beneficial).
Minor	<ul style="list-style-type: none"> Some measurable changes in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements (Adverse). Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring (Beneficial).
Negligible	<ul style="list-style-type: none"> Very minor loss or detrimental alteration to one or more characteristics features or elements (Adverse) Very minor benefit to or positive addition to one of more characteristics, features or elements (Beneficial).
No Change	<ul style="list-style-type: none"> No loss or alteration of characteristics, features or elements; no observable impact in either direction.

- 9.57 The assessment of impact magnitude is also in accordance with the IEMA guidelines and considers the following topics.

Severance

- 9.58 Severance is used to describe “...a complex series of factors that separate people from places and other people”. This can occur due to difficulties crossing a heavily trafficked road or relate to minor traffic flows if they impede pedestrian access to essential facilities. Factors which have been considered in the assessment include road width, traffic flow and composition, traffic speeds, availability of crossing facilities and the number of movements that are likely to cross the affected route.
- 9.59 In accordance with the Page 34 of the IEMA’s Guidelines for the Environmental Assessment of Road Traffic, the assessment uses a range of indicators including changes in traffic flows of 30%, 60% and 90% which are regarded as “slight”, “moderate” and “substantial” changes in severance, respectively. Furthermore, consideration has been given to the local conditions such as whether crossing facilities are available and traffic signal settings.

Driver Delay

- 9.60 Output from the SCTM has been used to understand potential future highway capacity constraints on the network that may result in increased driver delay.

Pedestrian Delay

- 9.61 The assessment of pedestrian delay has been carried out using professional judgement in accordance with the IEMA guidelines. The volume, composition or speed of traffic have the potential to affect the ability of people to cross roads. Increases in traffic levels are likely to lead to greater increases in delay; and the extent of the delay will be dependent on the level of pedestrian activity, visibility and general physical conditions of the Project Site.
- 9.62 Highly trafficked roads and changes to the volume or speed of traffic may affect the ability of people to cross roads. Pedestrian delay is considered significant beyond a low threshold of 10 seconds for a link with no crossing facilities.

Pedestrian Amenity

- 9.63 Pedestrian amenity is defined as “the relative pleasantness of a journey” and is affected by traffic flow, traffic composition, footway width and the pedestrian separation from traffic. The assessment of the impact magnitude relating to pedestrian amenity has been carried out in accordance with the IEMA guidance which states that there would be an improvement to pedestrian amenity when traffic flow (or lorry component) is halved and detrimental effect if doubled.

Fear and Intimidation

- 9.64 Pedestrians' fear and intimidation as a result of traffic is dependent on the volumes of traffic, the HGV composition, the proximity to people or the lack of protection (such as narrow footway widths). Table 9.4 presents the Fear and Intimidation thresholds – which appear on page 37 of IEA's "Guidelines for the Environmental Assessment of Road Traffic".

Table 9.4: thresholds for fear and intimidation

Degree of Hazard	Ave 18 hour traffic flow (veh/hour)	Total 18 hour HGV flow	Ave speed over 18 hour day (mph)
Extreme	1,800+	3,000+	20+
Great	1,200-1,800	2,000-3,000	15-20
Moderate	600-1,200	1,000-2,000	10-15

Accidents and Safety

- 9.65 The assessment of impact magnitude relating to accidents and safety is based on consideration of the accident data acquired from SCC which is presented and analysed in the TA.

Assessment of Significance of Effect

- 9.66 The relative significance of an effect is largely a product of the value and sensitivity of the identified receptor and the magnitude and duration of the impact, but the assessment is moderated by professional judgement and takes into account the considerations described above. The significance matrix is provided in Table 9.5 – which appears as Table 3.8.1 in DMRB's LA 104 'Environmental Assessment and Monitoring' Rev 1. It is assumed for the purposes of this assessment that any effects of moderate significance or greater will be significant in EIA terms.

Table 9.5: significance matrix

		Magnitude of Impact (Degree of Change)				
		No Change	Negligible	Minor	Moderate	Major
Environmental Value (Sensitivity)	Very High	Neutral	Slight	Moderate or Large	Large or Very Large	Very Large
	High	Neutral	Slight	Slight or Moderate	Moderate or Large	Large or Very Large
	Medium	Neutral	Neutral or Slight	Slight	Moderate	Moderate or Large
	Low	Neutral	Neutral or Slight	Neutral or Slight	Slight	Slight or Moderate
	Negligible	Neutral	Neutral	Neutral or Slight	Neutral or Slight	Slight

- 9.67 In the context of the Project, short to medium term (temporary) effects are generally considered to be those associated with the construction phase, and long term (permanent) effects are generally those associated with the operational phase.

Baseline Conditions

Site and Surrounding Area

- 9.68 The site is located on the western side of Ferry Road in Felixstowe, Suffolk. The site is bordered by Gulpher Road to the north and Ferry Road to the east. Opposite the site is a consented residential development that will provide up to 200 dwellings. To the west, the site borders the Adams family land, which is currently agricultural but has been identified for future development as part of the proposed North Felixstowe Garden Neighbourhood Masterplan being promoted by East Suffolk Council. Ferry Road runs south of the site, providing access to Old Felixstowe.
- 9.69 There are a number of consented/planned future developments in the local area within the North Felixstowe Garden Neighbourhood Masterplan, in addition to the Walton North development south of the A154 Candlet Road and the consented Ferry Road development opposite the site.

Walking and Cycling

- 9.70 There is an existing Public Right of Way (PROW) which is aligned east-west along the southern boundary of the site. The existing PROWs in the local area around the site are indicated by a red line within Figure 9.3. These PROWs join existing footways within the urban area of Old Felixstowe to the south.

- 9.71 Cycling is permitted along the roads surrounding the site and local area. Felixstowe town centre and Felixstowe train station are a 10 minute and 7 minute cycle respectively from the site's location.
- 9.72 Suffolk Coastal Cycle Route 41 runs directly across the north of the site along Gulpher Road and Ferry Road. This route runs from Snape to Bramfield through the Suffolk coast and heaths, connecting with National Cycle Routes 1 and 51 at Felixstowe and Regional Cycle Route 42 at Snape.

Figure 9.3: existing public rights of way (source: rowmaps.com)



Public Transport Accessibility

- 9.73 The closest bus stop to the site is on Rosemary Avenue, around 1km from the site to the southwest via Ferry Road / Colneis Road. This stop provides access to the 73 Village Links service operated by First. The 73 Village Links service provides connections to Woodbridge and Old Felixstowe.

- 9.74 There are many bus services operating nearby the site including the 75, 77, X7, 73, and 74 – providing access to destinations both within and outside of Felixstowe. Table 9.6 presents the bus routes, destinations served and approximate service frequencies of the bus services operating within Felixstowe around the site.

Table 9.6: Felixstowe bus services

Service	Route	Monday - Friday	Saturday	Sunday
75	Ipswich – Felixstowe	2 per hour	2 per hour	1 per hour
77	Ipswich – Landguard Fort	1 per hour	1 per hour	1 per hour
X7	Ipswich – A14 - Felixstowe	2 services per day	N/A	N/A
73	Felixstowe – Kirton - Woodbridge	1 every 2 hours	1 every 2 hours	N/A
74	Felixstowe – Kirton - Woodbridge	1 daily service	N/A	N/A

- 9.75 Felixstowe railway station is located approximately 2km southwest of the site within the town centre. This station is operated by Greater Anglia and provides 1 service per hour to Ipswich. The station provides 18 sheltered cycle storage spaces. Felixstowe train station is around a 7 minute cycle journey from the site. The 73 bus service stops at Great Eastern Square in Felixstowe which is adjacent to Felixstowe train station.

Local Highway Network

- 9.76 Ferry Road leads south into the residential area of Old Felixstowe, which is connected to Felixstowe.
- 9.77 Continuing south Ferry Road connects with High Road East which leads west to a priority roundabout connecting High Road West, Beatrice Avenue and the A1021 and Garrison Lane both of which provide access to Felixstowe town centre.
- 9.78 Colneis Road and High Road East are joined via Beatrice Avenue south exit of the Colneis Road/Beatrice Avenue/Grove Road/Links Avenue single-lane roundabout south east of the site. This roundabout has pedestrian refuge islands with tactile paving at each of its exits. Further west, Grove Road connects to a priority roundabout connecting with the A154 Candlet Road heading west to the A14 and south to connect with High Road West.

Accident Data

- 9.79 Personal Injury Accident data has been obtained from crashmap.co.uk for the latest available 5 year period pre-Covid up to 31st December 2019 for the road network study area presented in Appendix I of the TA. During this 5 year period 31 accidents were recorded within the study area of which 25 were slight and 6 were serious. No fatal accidents were recorded. The causes and patterns of the accidents do not suggest that there are any underlying road safety problems within the highway study area around the site.

Identified Sensitive Receptors

- 9.80 Identified sensitive receptors are listed below:

- Kingsfleet Primary School;
- Colneis Junior School;
- Residential properties on Colneis Road;
- Residential properties on High Road East;
- Residential properties on Grove Road;
- Residential properties on Ferry Road;
- Residential properties on A154 Candlet Road;

Design Interventions and Controls

- 9.81 No initial design interventions were made for traffic and access. Any mitigating actions have been outlined later in the ES Transport Chapter.

Assessment of Effects – Construction Phase

- 9.82 The construction works would be undertaken within the curtilage of the Site with access provided via a temporary vehicle access that would be formed on Ferry Road.
- 9.83 A Detailed Construction Logistics Plan (CLP) will be prepared once a contractor is appointed and following further discussions with SCC. The detailed CLP will be secured via an appropriately worded planning condition or obligation.

Construction Traffic Vehicular Movements

- 9.84 There are no known hazardous materials on the site. The transport-related effect of Hazardous Loads is therefore considered to be **negligible**.
- 9.85 The construction phase of the Project is expected to take place during 2023, with the proposed development opening in 2024. The construction phase would generate short-term, temporary increases in vehicle movements on the highway in the vicinity of the Site. It should also be noted that 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. Nevertheless, for the purposes of the ES Transport Chapter, an estimate has been made of construction vehicle movements based on a consented residential development of 140 dwellings at Winstanley in London Borough of Wandsworth – which represents a very similar size of residential development. The average daily construction vehicle numbers for the Winstanley development (Block 5) are summarised below for reference, based on information provided by the Contractor for that development:

- Concrete Mixer: 12 vehicles per day
- Large Tipper / Roll on Roll off skip: 35 per day
- Skip Truck / Roll on Roll off skip: 4 per week (assume 1 per day)
- Flatbed Delivery Vehicle / 17t Rigid Vehicle: 10 per day.
- Large Articulated Vehicle: 2 per week (assume 0 per day)
- Small Vans / Light Commercials: 10 per day
- Total: 68 construction vehicles per day.

9.86 Based on an average of 68 construction vehicle movements per day, this would equate to an average of 7 construction vehicle arrivals and 7 construction vehicle departures per hour based on a 10 hour working day. An assessment of the peak hour percentage increase in traffic flow on highway routes to be used by construction traffic is presented in Table 9.7 for the AM peak hour (8 AM to 9 AM) and PM peak hour (5 PM to 6 PM).

Table 9.7: construction vehicle percentage increase (two-way)

	2023 Baseline*		Construction Traffic		Percentage Change	
	AM	PM	AM	PM	AM	PM
Link 1 – Ferry Road North	108	119	7	7	6.5%	5.9%
Link 3 – Colneis Road	789	390	7	7	0.9%	1.8%
Link 5 – A134 Candlet Road	2316	2120	7	7	0.3%	0.3%
Link 6 – A14	4466	4677	7	7	0.2%	0.1%

* Baseline flows for 2023 derived from 2036 End of Local Plan Period traffic flows, with a TEMPRO growth factor of 0.8715 applied to 2036 traffic flows to generate 2023 flows.

9.87 Table 9.7 shows that none of the main highway routes that would be used by construction traffic would be subject to an increase in construction traffic of 30% or more. Construction traffic is predicted to have a **slight adverse** effect, based on a minor magnitude of impact on medium level sensitivity receptors.

- 9.88 In addition to heavy construction traffic, there will also be some construction staff vehicle movements, although construction staff travelling to the Site by car would arrive and depart outside of the network peak hours, with arrivals and departures most likely to be clustered around shift start and finish times. Construction staff travelling by car are predicted to have a **slight adverse** effect; based on a minor magnitude of impact on medium level sensitivity receptors.

Pedestrian and Cyclist Movement and Amenity

- 9.89 Construction traffic associated with the Project has the potential to affect pedestrians and cyclists using the highway network in the vicinity of the Site, as a result of temporary disruption from vehicles (particularly HGVs) accessing and egressing the Site and on the nearby highway network. Given the number of construction vehicles associated with the Project, the likely effects of construction traffic on pedestrian and cyclist movement and amenity along the main construction traffic routes would be short term, local, **adverse** and **slight** on local receptors.

Public Transport

- 9.90 During the construction period there would be an increased number of workers in the local area that would use the public transport network. It should, however, be noted that the majority of the construction workforce would be travelling outside of the peak network periods and the likely effect on public transport capacity would therefore be negligible, particularly given that construction staff typically start and finish shifts earlier than office based staff. The effect of the construction phase on existing public transport capacity is therefore considered **negligible**. In addition, due to the forecast volumes of HGV construction traffic throughout the day it is considered that HGV construction traffic would have only a **slight adverse** impact on members of the public waiting at existing bus stops located along construction traffic routes.

Assessment of Effects – Operational Phase

Trip Generation from the Completed and Operational Development

- 9.91 The Project would generate a total of 149 person trips during the AM network peak hour (8 AM to 9 AM) and 128 person trips during the PM network peak hour (5 PM to 6 PM).
- 9.92 The multi-modal trip generation for the Project during the weekday AM and PM network peak hours is presented in Table 9.8, based on the analysis presented in the Transport Assessment that was submitted as part of the planning application.

Table 9.8: weekday peak hour multi-modal trip generation (two-way)

Transport Mode	Trips	
	AM	PM
Pedestrians	29	17
Cyclists	3	3
Public Transport	6	5
Cars	61	60
Taxis	1	0
LGVs	6	7
OGVs	0	0
PSVs	0	0
Total Vehicles	69	68
Vehicle Occupants	111	102
Motorcycles	0	1
Total People	149	128

Operational Traffic Flows on the Surrounding Highway Network

- 9.93 Table 9.9 shows the additional vehicle trips on key highway links within the transport study area for the Project, based on the 2036 future year to represent a worst case assessment at the end of the current Local Plan period.

Table 9.9: additional two-way peak hour traffic flows on highway links (2036)

Highway Link	2036 Do Nothing		2036 Do Something		Percentage Change (%)	
	AM	PM	AM	PM	AM	PM
Ferry Road North	124	136	194	204	56%	50%
Ferry Road South	184	136	198	150	8%	10%
Colneis Road	905	448	961	502	6%	12%
Grove Road	2,118	1,616	2,174	1,671	3%	3%
A154 Candlet Road	2,658	2,433	2,700	2,474	2%	2%
A14	5,124	5,367	5,166	5,408	1%	1%
High Road East	549	740	563	753	3%	2%
High Road West	549	523	563	536	3%	2%
High Street / High Road West	1,465	1,443	1,465	1,443	0%	0%
Beatrice Avenue	1,139	934	1,139	934	0%	0%
Garrison Lane	1,313	1,220	1,313	1,234	1%	1%
A14 Port of Felixstowe Road	3,323	3,787	3,327	3,787	0%	0%

- 9.94 The Project is predicted to result in an increase in traffic flow of greater than 30% on the Ferry Road (North) highway link only. However, this percentage increase should be understood in the context of the very low volume of peak hour flow on this highway link. On this basis, it is considered that the additional development traffic on Ferry Road (North) will have a negligible impact.
- 9.95 With regard to Ferry Road (North), further consideration has been given below to the highway-related topics identified in this Transport Chapter:
- **Severance:** The increase in traffic flow on the highway link is predicted to be greater than the 30% threshold in IEMA's guidance and is therefore regarded as 'moderate' change in severance – although this has to be understood in the context of the very low level of baseline traffic flow on the highway link. On this basis, it is considered that the Project would have a negligible severance effect;
 - **Driver Delay:** The additional traffic generated by the Project would have a negligible impact on Ferry Road (North); and
 - **Accidents and Safety:** The TA reviewed personal injury accident data for the most recent available 5 year period preceding the Covid-19 lockdown. The data was reviewed to establish whether there are any road safety issues associated with the existing highway network around the Site. Analysis of the accident data suggests that there is no particular issue relating to the highway network within the accident analysis area of influence. The Project is not expected to result in a material change to the existing number and type of accidents and is therefore predicted to have a negligible effect.
- 9.96 For almost all other highway links, the Project is predicted to result in a change in traffic flow of between -10% and +10%, i.e. below the IEMA's screening threshold percentage change levels set out in Paragraph 3.15 of the IEMA's guidance which serve to delimit the scale and extent of the assessment.

Parking

- 9.97 Parking for the proposed development would be provided in accordance with parking standard guidance contained within Suffolk County Council's technical guidance document 'Suffolk Guidance for Parking' dated November 2015.

Pedestrian and Cyclist Facilities and Conditions – Pedestrian Movement and Capacity

- 9.98 The Project is predicted to generate 29 two-way pedestrian trips during the AM peak hour and 17 two-way pedestrian trips during the PM peak hour.
- 9.99 As part of the consented development opposite the site on the other side of Ferry Road, a new footway will be installed along the eastern side of the road that connects the consented development to the existing footway network to the south and into Old Felixstowe.

- 9.100 The surrounding network of pedestrian routes is considered sufficient to meet the additional pedestrian demand. The Project is therefore considered to result in a **negligible** effect on pedestrian movement and available capacity within the surrounding network of pedestrian infrastructure.

Pedestrian and Cyclist Facilities and Conditions – Pedestrian Severance, Delay, Fear and Intimidation, Amenity

- 9.101 The Project would have good permeability across the Site with well-maintained and legible footways to ensure that perceptions of severance are minimised. All surfaces would be fully accessible and compliant with Part M of the Building Regulations. All accesses would be designed to current design guidelines, including visibility splays and road widths and lighting would be provided across the Site to improve both legibility and safety.
- 9.102 The Project would benefit from well-designed pedestrian facilities which serve desire lines.
- 9.103 The likely significant effects in relation to pedestrian severance, delay, fear and intimidation and amenity on Ferry Road would be as follows:
- **Pedestrian Severance:** Negligible effect;
 - **Pedestrian Delay:** Negligible effect;
 - **Pedestrian Fear and Intimidation:** Negligible effect on existing fear and intimidation levels – partly as a result of the development traffic flow well below the lowest threshold level denoting a ‘moderate’ degree of hazard for both traffic flow and HGV flow as set out on page 37 of IEMA’s guidelines; and
 - **Pedestrian Amenity:** Negligible effect.

Pedestrian and Cyclist Facilities and Conditions – Cycling

- 9.104 The Project is predicted to generate 3 two-way cycle trips during the AM peak hour and 3 two-way cycle trips during the PM peak hour.
- 9.105 Given the predicted number of additional cycle trips generated by the Project, it is considered that the Project will have a **negligible** effect on users of the local cycle network.

Public Transport Network and Accessibility – Buses

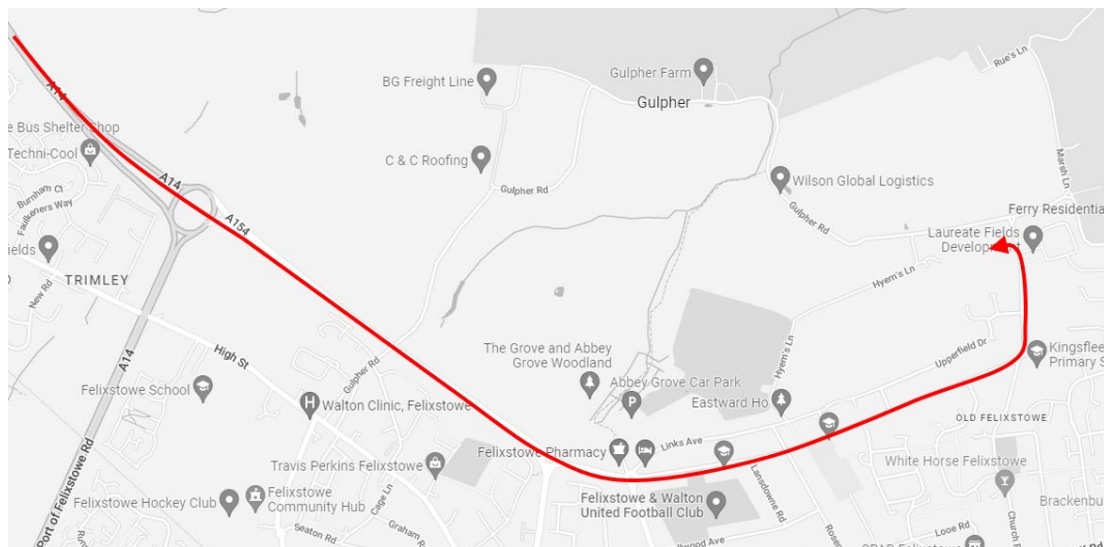
- 9.106 The Project is predicted to generate an increase of 6 two-way public transport trips during the AM peak hour and 5 two-way public transport trips during the PM peak hour.

- 9.107 The effect of the Project on the capacity of existing public transport services and its passengers is considered to be **negligible** based on the established significance criteria.

Mitigation and Enhancement Measures – Construction

- 9.108 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 as a result of the construction phase.
- 9.109 The maximum range of working hours will be from 08:00 until 18:00 between Monday and Friday. Weekend working is not anticipated.
- 9.110 It is anticipated that construction vehicles will access the Site from the dedicated temporary construction vehicle access that would be formed on Ferry Road. The proposed routes for construction vehicles are presented in Figure 9.4 and would be agreed with SCC prior to construction through the submission of a full CLP.

Figure 9.4: proposed construction traffic routes



- 9.111 Delivery booking systems shall be employed to ensure vehicles coming to the Site are managed effectively and efficiently in a timely manner. Construction traffic entering the site is not expected to queuing 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.
- 9.112 It is anticipated that the majority of vehicles delivering and removing materials from Site will be HGVs. There will also be a number of LGVs visiting the Site on a daily basis.

- 9.113 Secure cycle storage will be provided to encourage operatives to travel to Site in a sustainable way. The number of cycle parking spaces will be reviewed regularly and increased based on demand.
- 9.114 All construction personnel will be encouraged to travel by public transport, walking or cycling. Details of the local bus, rail and cycle networks will be posted on Site notice boards and discussed in the induction meetings. Where operatives have to travel to the Site using private vehicles, van / car sharing will be encouraged as far as possible although it is appreciated there will need to be car parking spaces provided on Site during the construction phase.

Mitigation and Enhancement Measures – Operational Phase

Public Transport Mitigation

- 9.115 The assessment has not identified a need for any public transport mitigation.

Walking and Cycling Mitigation

- 9.116 The proposed development is expected to generate 29 walking trips during the weekday AM peak hour and 17 walking trips during the weekday PM peak hour.
- 9.117 The proposed development is expected to generate 3 cycling trips during the weekday AM peak hour and 3 cycling trips during the weekday PM peak hour.
- 9.118 A new footway would be provided on the western side of Ferry Road from the proposed site access junction as far as, and integrating with, the existing footway network on Ferry Road, to provide for an encourage journeys on foot in to Old Felixstowe and beyond.
- 9.119 The existing PROW aligned east-west alongside the southern boundary of development would be upgraded as part of the proposed development, including proper surfacing, drainage and lighting.
- 9.120 The proposed active travel infrastructure improvements described above are considered sufficient to mitigate against any impacts on the walking and cycling network and encourage a shift towards use of active travel modes.

Cumulative Effects

- 9.121 As part of the EIA Scoping process, a schedule of developments was identified by Sweco and ESC for inclusion in the cumulative assessment. As well as background traffic growth on the network represented by TEMPRO traffic growth factors, the traffic flow associated with the following schedule of committed land use developments has also explicitly been taken into account and included within the assessment:

North Felixstowe Garden Neighbourhood:

- Land North of Candlet Road.
- Eastward Ho
- Trinity College Land.
- Adams Family Land.

Other Local Committed Development:

- Land South of Candlet Road (Walton North)
- Land West of Ferry Road

- 9.122 A more detailed description of each committed development is provided in the Assessment Methodology section above.

Residual Effects – Construction

Construction Traffic Vehicular Movements

- 9.123 Consideration has been given to the likely numbers of construction vehicles and the routes to and from the Site. The construction vehicles would be managed in accordance with a full CLP, as detailed in this ES. These documents would be agreed with Suffolk County Council prior to the commencement of works and would seek to address issues such as the implementation of a vehicle routing plan and on-site parking control.
- 9.124 The likely residual effects of construction related traffic on highway capacity are summarised below:
- The increase in HGV construction traffic would be categorised as **slight adverse**.
 - The increase in other construction related traffic would occur outside of the network peak hours and would be categorised as **slight adverse**.

Pedestrian and Cyclist Movement and Amenity

- 9.125 As indicated above, a full CLP would be implemented to mitigate construction transport effects of the Project, including the effects on footways and cycle routes near to the Site, and would include measures such as having banksman to maintain safety around the Site vehicle access point and ensuring that vehicles enter / exit the Site in forward gear. Following implementation of the mitigation, the likely residual effects on pedestrian and cyclist movement and amenity would be **slight adverse**.

Public Transport

- 9.126 As the majority of construction workers would be travelling outside of the network peak periods, the likely residual effect on public transport capacity would be **negligible**. The effect of the Project on existing public transport passengers would be **slight adverse**.

Residual Effects – Completed Development

Traffic Flows and Highways

- 9.127 Based on the highway assessment presented in the TA and in this ES Chapter no highway mitigation is predicted to be required in respect of traffic flows on the surrounding highway network as the effects of the completed and operational development have been assessed as follows:

- Severance: Negligible effect;
- Driver Delay: Negligible effect; and
- Accidents and Safety: Negligible effect.

- 9.128 A Residential Travel Plan for the Project has been prepared as a separate document and submitted with the planning application. The Travel Plan aims to encourage public transport use, walking and cycling amongst users of the Project with the aim of reducing private car use. The Travel Plan also incorporates a range of design measures to facilitate sustainable travel from the outset. The residual effects of the Project would remain **negligible**.

Deliveries and Servicing

- 9.129 Any delivery and service vehicle trips that would be generated by the development would be accommodated within the site. The likely residual effects arising from additional deliveries and servicing would be **negligible**.

Public Transport Network and Accessibility

- 9.130 The effects upon public transport from the Project are considered **negligible**.

Summary of Effects

- 9.131 A summary of the effects is provided in Table 9.10 which identifies no significant adverse impacts.
- 9.132 Table 9.11 provides a summary of the proposed mitigation and enhancement measures.

Table 9.10: summary of significant effects

Receptor	Description of Effect	Nature of Effect*						Nature of Cumulative Effect						Nature of Residual Effect					
		Significance **	+ -	D I	P T	R IR	St Mt Lt	Significance **	+ -	D I	P T	R IR	St Mt Lt	Significance **	+ -	D I	P T	R IR	St Mt Lt
Demolition and Construction Phase																			
Routes used by construction traffic	Daily construction traffic vehicle movements	Slight adverse	-	D	T	R	ST	Slight adverse	-	D	T	R	ST	Slight adverse	-	D	T	R	ST
Routes used by construction traffic	Impact of construction on pedestrian and cyclist movement and amenity	Slight adverse	-	D	T	R	ST	Slight adverse	-	D	T	R	ST	Slight adverse	-	D	T	R	ST
Routes used by construction traffic	Impact of construction on capacity of existing public transport services	Negligible																	
Routes used by construction traffic	Impact of construction on existing public transport passengers	Slight adverse	-	D	T	R	ST	Slight adverse	-	D	T	R	ST	Slight adverse	-	D	T	R	ST

Receptor	Description of Effect	Nature of Effect*						Nature of Cumulative Effect						Nature of Residual Effect					
		Significance **	+ -	D I	P T	R IR	St Mt Lt	Significance **	+ -	D I	P T	R IR	St Mt Lt	Significance **	+ -	D I	P T	R IR	St Mt Lt
Operational Phase																			
Highway Link: Ferry Road North	Traffic increase greater than 30%	Negligible						Negligible						Negligible					
Pedestrians	Pedestrian Movement and Capacity	Negligible						Negligible						Negligible					
Pedestrians	Severance	Negligible						Negligible						Negligible					
Pedestrians	Delay	Negligible						Negligible						Negligible					
Pedestrians	Fear and Intimidation	Negligible						Negligible						Negligible					
Pedestrians	Pedestrian Amenity	Negligible						Negligible						Negligible					
Cycling		Negligible						Negligible						Negligible					
Public Transport	Buses	Negligible	-					Negligible	-					Negligible	-				
Public Transport	Trains	Negligible						Negligible						Negligible					

Notes:

* - = Adverse/ + = Beneficial; D = Direct/ I = Indirect; P = Permanent/ T = Temporary; R=Reversible/ IR= Irreversible; St- Short term/ Mt –Medium term/ Lt –Long term.

**Slight/ Moderate/ Substantial

Table 9.11: summary of proposed mitigation and enhancement measures

Receptor	Description of Effect	Proposed Mitigation and Enhancement Measures	Mitigation for Cumulative Effects
Demolition and Construction Phase			
Routes used by construction traffic	Daily construction traffic vehicle movements.	Full Construction Logistics Plan (FCLP)	No additional mitigation recommended.
Routes used by construction traffic	Impact of construction on pedestrian and cyclist movement and amenity	Full Construction Logistics Plan (FCLP)	No additional mitigation recommended.
Routes used by construction traffic	Impact of construction on existing public transport services	Full Construction Logistics Plan (FCLP)	No additional mitigation recommended.
Operational Phase			
Highway Links	Traffic increase of greater than 30% on Ferry Road North.	Travel Plan. Improvements to active travel infrastructure.	No additional mitigation recommended.
Pedestrians and Cyclists		Improvements to active travel infrastructure.	No additional mitigation recommended.
Public Transport		No mitigation required.	No mitigation required.

References

Guidelines for the Environmental Assessment of Road Traffic (1993), Institute of Environmental Management and Assessment (IEMA)

National Planning Policy Framework

Department for Transport Local Transport Note 1/20

Suffolk Local Transport Plan (2011-2031)

East Suffolk Council – Suffolk Coastal Local Plan (2020)

Suffolk Green Access Strategy Public Rights of Way Improvement Plan 2020 to 2030

10. Cumulative Impacts

- 10.1 This chapter considers the potential for cumulative environmental impacts to be caused by the proposed scheme; cumulative impacts will encompass the combined impacts of reasonably foreseeable human-induced changes within a specific geographical area and over a fixed period of time, and the cumulative impacts can be both direct and indirect. In the context of the emerging environment, an assessment of the significance of the cumulative impacts is undertaken.
- 10.2 The assessment is needed to ensure that the proposed scheme and the reasonably foreseeable schemes agreed by East Suffolk Council in their scoping opinion are mutually compatible, consistent with guidance on sustainable development and associated good practice, and within the environmental capacity of the area.
- 10.3 A description of the two types of cumulative impacts (synergistic impacts/impact interaction and additive impact/in-combination effect) and the scope of the cumulative assessment are set out at paragraphs 6.18 to 6.22 in chapter 6 of this statement.

Planning policy context

- 10.4 All relevant national planning guidance and local planning policies are set out in chapter 3 of this statement. This provides the basis for the subsequent assessment of the potential effects of the proposed scheme against key planning objectives and policies. Specific legislation, standards, guidelines and best practice where they are applicable to the three technical chapters are set out in those chapters.

Assessment methodology

- 10.5 The scope of the assessment of cumulative impacts, including the other schemes to be considered, was proposed in the EIA Scoping Report and agreed by East Suffolk Council in their Scoping Opinion. They are included in this statement at Appendix 6.1 and Appendix 6.2, respectively. The schemes that are considered as part of the cumulative assessment are set out in the Scoping Report, Scoping Opinion and repeated at Table 6.2 of this assessment. A full description of the proposed scheme is set out in chapter 2 of this statement.
- 10.6 The methodology for the assessment of cumulative impacts is based on previous experience, the types of receptors being assessed, the nature of the proposed scheme and the nature of the other reasonably foreseeable development. It comprises:
- Consultation with East Suffolk Council through the submission of the Scoping Report (application reference DC/21/4329/EIA) and the publication of their Scoping Opinion (dated 28 January 2022), agreeing the other developments which are to be considered and the methodology used to assess their cumulative impacts.
 - Desk based assessment using professional expertise to make judgements on the likely significance of predicted changes to the baseline conditions.

- The assessment of impact interactions, based on the residual impacts (those which remain after mitigation) that are identified by chapters 7, 8 and 9 of this statement.
- 10.7 The application seeks outline planning permission for the development of the site, meaning that detailed plans for the proposed scheme will not be prepared until the reserved matters stage. In addition, draft scheme for the North Felixstowe Garden Neighbourhood has not yet reached the masterplan stage and there is limited technical information available on the environmental impacts that are predicted to arise from the development of the site. As such, there are areas where the opportunities to assess the significance of cumulative impacts in detail are limited and these can be attributed to uncertainty caused by the lack of a fully prepared scheme. Conversely, where planning permissions have been granted for the other sites, these permissions have been reviewed to help inform the professional judgements made in this chapter.

Synergistic impacts

- 10.8 Synergistic impacts (also called combined impacts or impact interaction) are caused by the interaction of a number of impacts of the proposed scheme on a particular receptor, which may collectively cause a more significant impact than if they are assessed individually.
- 10.9 The results of this assessment are based on the residual effects rated with a “minor to moderate” or greater significance that are set out in chapters 7, 8 and 9 of this statement. Residual effects rated as less than “minor to moderate” significance are considered to be *de minimus* for the purpose of assessing impact interactions.
- 10.10 For synergistic impacts, the findings of chapters 7, 8 and 9 identify that the following key receptors are to be considered:

Construction phase

- Landscape, site as a landscape receptor
- Townscape, land use as a landscape receptor
- Townscape, distinctive character as a landscape receptor
- Townscape, attractive spaces as a landscape receptor
- Visual amenity: Views 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14 and 15
- Breeding bird habitat (including skylarks)
- Badger habitat

Operational phase

- Townscape, distinctive character as a landscape receptor
- Townscape, attractive spaces as a landscape receptor
- Visual amenity: Views 1, 2, 3, 4, 5, 14 and 15
- International and national ecological designations

10.11 Table 10.1 summarises the synergistic impacts between the relevant environmental effects assessed in this statement at the construction stage.

Table 10.1: synergistic impacts, construction phase

Residual effect	Significance of impact on key receptors		
	Landscape and viewpoints	Transport	Biodiversity
Landscape: site	Moderate	Negligible	Negligible
Townscape: land use	Minor-moderate	Negligible	Negligible
Townscape: distinctive character	Moderate	Negligible	Negligible
Townscape: attractive character	Moderate	Negligible	Negligible
Visual amenity: Views 1 to 12, 14 and 15	Substantial to minor-moderate	Negligible	Negligible
Bird nesting habitat	Negligible	Negligible	Moderate
Badger foraging areas	Negligible	Negligible	Moderate
Overall synergistic impact	Substantial to minor-moderate	Negligible	Moderate

10.12 Table 10.1 shows that there are likely to be two synergistic impacts during the construction phase. Residual effects during construction were considered to be minor to negligible for all transport-related impacts.

- 10.13 Notwithstanding the sensitive treatment of the indicative scheme for the development of the site that may guide the form proposed at the reserved matters stage, the adverse impacts caused by the change of use from a field in agricultural use to residential development for up to 150 new homes at no more than two storeys in height may combine to create an overall adverse impact of moderate significance on the local landscape and biodiversity and an overall adverse impact of substantial to minor to moderate significance on visual amenity. Neither is not related to the construction of the new homes, instead reflecting that the change in the use of the site occurs at the beginning of the construction phase and that mitigation measures will be implemented during and not prior to the construction stage.
- 10.14 All other impacts at the construction stage will remain unchanged from the findings set out in chapters 7, 8 and 9.
- 10.15 Table 10.2 summarises the synergistic impacts between the relevant environmental effects assessed in this statement at the operational stage

Table 10.2: synergistic impacts, operational phase

Residual effect	Significance of impact on key receptors		
	Landscape and viewpoints	Transport	Biodiversity
Townscape: distinctive character	Moderate	Negligible	Negligible
Townscape: attractive character	Moderate	Negligible	Negligible
Visual amenity: Views 1 to 5, 14 and 15	Substantial-moderate to minor-moderate	Negligible	Negligible
International, national ecological designations	Negligible	Negligible	Refer to Shadow HRA
Overall synergistic impact	Substantial-moderate to minor-moderate	Negligible	Refer to Shadow HRA

- 10.16 Table 10.2 shows that there are likely to be two synergistic impacts during the operational phase. Residual effects during construction were considered to be minor to negligible for all transport-related impacts.

- 10.17 Synergistic impacts are expected in relation to visual impacts (landscape and viewpoints) and biodiversity. The main adverse synergistic on the local landscape is an inevitable consequence of developing a greenfield site and has been mitigated, as far as possible, through measures that dictate the form of development and landscaping scheme that will be submitted for approval as part of the detailed scheme to be created at the reserved matters stage. No further mitigation is reasonably achievable or deemed to be necessary.
- 10.18 Biodiversity impacts relate to the increased demand for recreational opportunities caused by residential development in relatively close proximity of the coast and the international and national wildlife designations therein. The impact of the site in isolation is considered by the Shadow Habitats Regulations Assessment prepared in support of the application for outline planning permission; East Suffolk Council has already addressed the additive impact of all residential development in the zone of influence through the adoption of the Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy (RAMS), addressing the potential impact of the site in isolation. It is described in more detail in paragraphs 10.27 to 10.32.
- 10.19 All other impacts at the operational stage will remain unchanged from the findings set out in chapters 7, 8 and 9.

Additive impacts

- 10.20 Additive impacts (also called in-combination effects) are caused by the impacts from individual sites combining to create a greater impact than if the sites are considered in isolation; the list of reasonably foreseeable development assessed in chapters 7, 8 and 9 is set out in East Suffolk Council's Scoping Opinion and Table 6.2 of this statement. The developments are considered cumulatively by topic.

Landscape and visual effects

- 10.21 The reasonably foreseeable development considered to have potential cumulative effects in combination with the site are the North Felixstowe Garden Neighbourhood (to the west) and Laureate Fields (to the east), with construction of the latter almost complete. The character of all three sites will permanently change from fields in agricultural use to a residential area comprising buildings, streets and open space. Buildings at three storeys tall have already been completed at Laureate Fields, whilst the allocation of the site for development by Policy SCLP12.4 of the Suffolk Coastal Local Plan restricts building heights to two storeys, confirming that the additive impact of built development has already been considered during the preparation of the local plan. Policy SCLP12.3 does not set a maximum building height for the garden neighbourhood.
- 10.22 Beyond the pair of adjoining sites and their immediate environs, there would be no additional landscape or visual impacts arising from the reasonably foreseeable development.

- 10.23 The site is well-located in relation to the existing topography and settlement pattern. The combination of the retention of boundary vegetation and an appropriate scheme to deliver new planting will limit the magnitude and extent of changes to the landscape. Changes to some views will be substantial as a result to the swap from agricultural use to residential use, including altering the character of Gulper Lane from a rural lane to the new outer edge of the town, although mitigation through planting and open space addresses the additive impact and presents the opportunity to establish a softer settlement edge in the long term.
- 10.24 There would be no direct loss or impact on the natural beauty and special qualities of the Suffolk Coast & Heaths AONB, and although the developed site will be discernible from the AONB, the change will be minor and the additive impact will be therefore have a very minor effect on the AONB. The wider residual effects on the Deben valley and the AONB are assessed as negligible in the context of the surrounding development, whereas the impact on townscape elements identifies the magnitude of change between low neutral and beneficial because the development would not be uncharacteristic within the surrounding context. The detailed landscaping scheme at the reserved matters stage provides the opportunity to locally increase vegetation cover and establish a softer settlement edge, the proposed building heights match the existing ones, the site is well connected into the existing movement framework and there is an opportunity to design a scheme with a distinct character that complements the surroundings and enhances its edge of town location.

Transport and access

- 10.25 Construction works, and construction works on the other sites included in the cumulative assessment, will be subject to control through the imposition of a condition requiring that a Construction Management Plan (CMP) or Construction Logistics Plan (CLP) be submitted for approval prior to the commencement of development. Where appropriate, the CLP can be integrated into a wider CMP. Securing control of the construction phase is standard practice for East Suffolk Council and they will liaise with the highways team at Suffolk County Council when considering logistics and construction access. Even if all four sites were to be under construction simultaneously, the residual effects of construction traffic are found to be slight adverse and no significant in-combination effects are identified.
- 10.26 The highway assessment in the Transport Assessment submitted as part of the application for outline planning permission and the detailed assessment in Chapter 8 of this statement do not identify the need for mitigation measures on the surrounding highway network; the effects of the proposed scheme are negligible. Including an allowance for background traffic growth, the combination of the four elements of the North Felixstowe Garden Neighbourhood, the two other committed developments and the application site can be accommodated by the existing road network without causing any significant effect. Moreover, chapter 8 predicts that with the creation of residential travel plans for each site and the promotion of active travel from central government, the use of private cars can be reduced and sustainable travel can be facilitated from the beginning of the operational phase.

Biodiversity and ecology

- 10.27 The potential for likely significant effects to be generated on the internationally designated sites on the Suffolk coast, when considered as a combination of the proposed scheme and the reasonably foreseeable development, is assessed in the separate Shadow Habitats Regulations Assessment.
- 10.28 This statement considers the proposed scheme in combination with other plans and projects that are within the zone of influence for the Suffolk coast designations that are defined by the *Suffolk Coast Recreational Disturbance Avoidance and Mitigation Strategy* (RAMS) – the identified zone of influence for the designations stretches beyond East Suffolk district and captures a large area that incorporates the adjoining local authorities (Ipswich, Babergh and Mid Suffolk). The purpose of the RAMS is to mitigate the predicted in-combination effects of recreation activity at the coast that is generated by residential development across eastern and south eastern Suffolk: in the absence of mitigation, the operational in-combination effects on the coastal designations in relation to recreational pressure are considered to be moderate negative and long-term, which is significant at the international level.
- 10.29 With the RAMS already adopted by the district council and operational, mitigation of the potential impact arising from the development of the Site has already been put in place as part of a much wider strategy. The outline planning permission will secure a payment in accordance with the RAMS, delivered through a planning obligation in a Section 106 Agreement, ensuring that the mitigation, in view of the conservation objectives of the designation, would fully mitigate the predicted in-combination effects.
- 10.30 A moderate impact at the construction stage is identified for nesting birds, although this can be mitigated by restricting clearance of arable crop and hedgerow to avoid the bird nesting season (March to August, inclusive). This mitigation is already established as best practice and can be applied to all reasonably foreseeable development, therefore avoiding any additive impact caused by more than one site being cleared during the nesting season. These measures can be secured through a condition attached to the outline planning permission, requiring approval prior to the commencement of development as part of a Construction Management Plan.
- 10.31 The breeding bird survey identified one skylark breeding territory over the arable crop, which would be lost through the redevelopment of the site. There is an arable crop in the fields to the west of the site, within the area allocated as the North Felixstowe Garden Neighbourhood, suggesting that a cumulative impact is likely. The creation of two skylark foraging plots on nearby arable land (outside any areas allocated for development) is proposed as mitigation, to be created and maintained in accordance with RSPB guidance for at least five years. This mitigation can be secured through a condition or planning obligation attached to the outline planning permission, with similar measures delivered as part of the scheme for the garden neighbourhood.

- 10.32 Clearance of hedgerow and grassland habitat is also identified as a moderate risk to badgers during the construction phase; any additive impact would be as a result of such being undertaken on more than one of the reasonably foreseeable sites simultaneously. The assessment in Chapter 8 identifies appropriate mitigation measures and these can be applied to all sites during the construction phase to ensure that there is no additive impact. Such measures can be secured through a condition attached to the outline planning permission, requiring approval prior to the commencement of development as part of a Construction Management Plan.

Summary and conclusions

- 10.33 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 chapters 7, 8 and 9 they relate to separate elements of the proposed scheme and do not combine to create a greater effect.
- 10.34 When the proposed development is operational (that is, when the new homes are occupied), 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.
- 10.35 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 where the potential for likely significant effects to be generated on the international and national ecological designations on the coast has been considered by a group of local planning authorities in partnership with Natural England, leading to the council adopting 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 this statement. With the implementation of the existing RAMS mitigation, the cumulative effects in relation to the ecological designations are considered to be negligible and not significant.
- 10.36 With regard to 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 construction management plan for each development, in line with best practice, therefore the additive impact will be no greater than the individual impacts of each site.