

LAND NORTH OF CONWAY CLOSE AND SWALLOW CLOSE, FELIXSTOWE

ENVIRONMENTAL STATEMENT VOLUME III: APPENDICES



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Chapter 4 – Description of the Proposed Development

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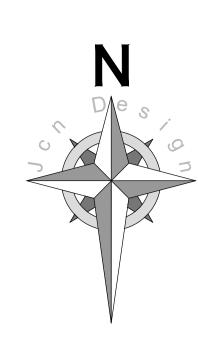
Appendix 4.3 Concept Layout, drawing number GN003-CPT-01

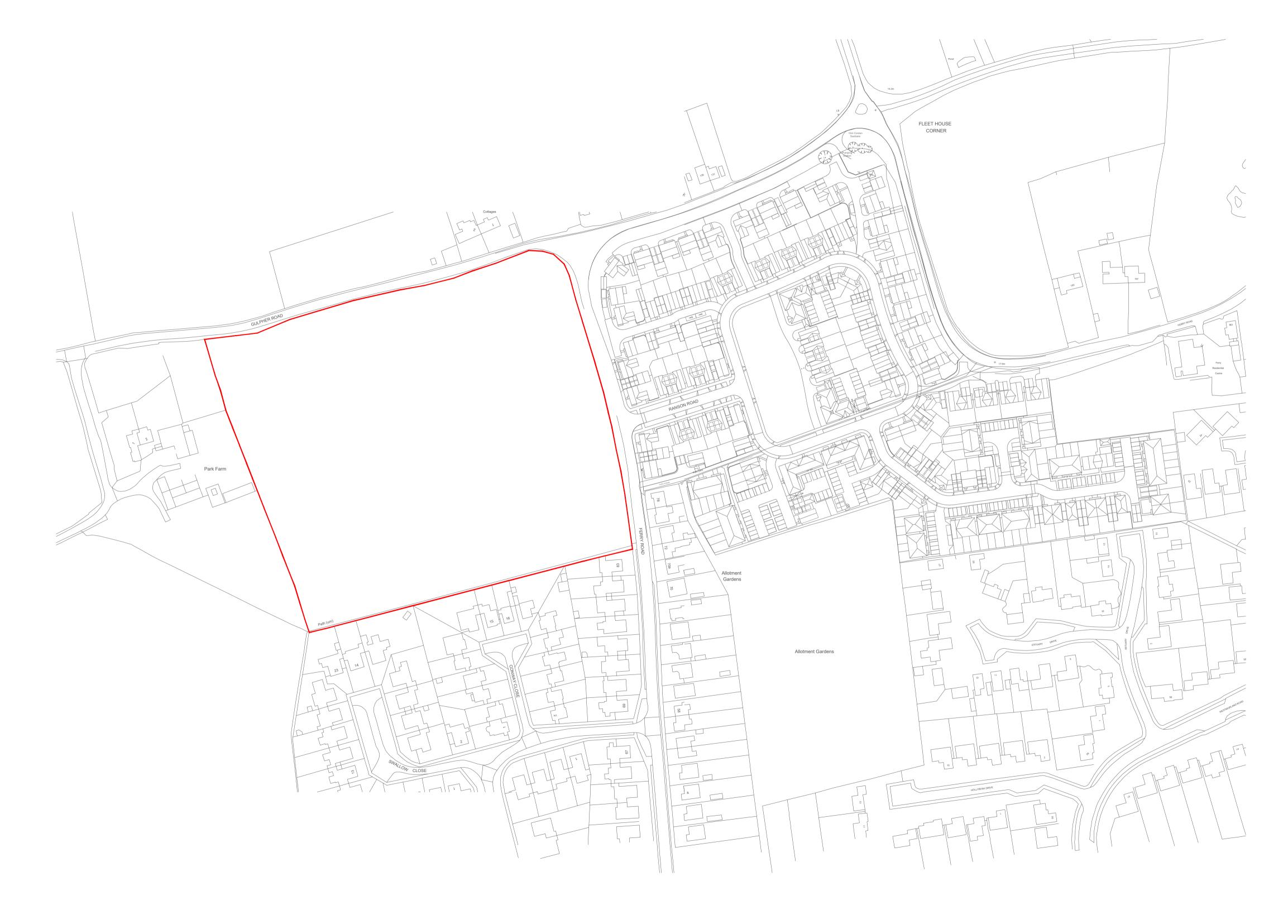


Appendix 4.1

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







Project:Land West of Ferry
Road, Felixstowe,
Suffolk

Description:-

Location Plan

GN003-PH2-LP-01 1-1250 @ A1 B

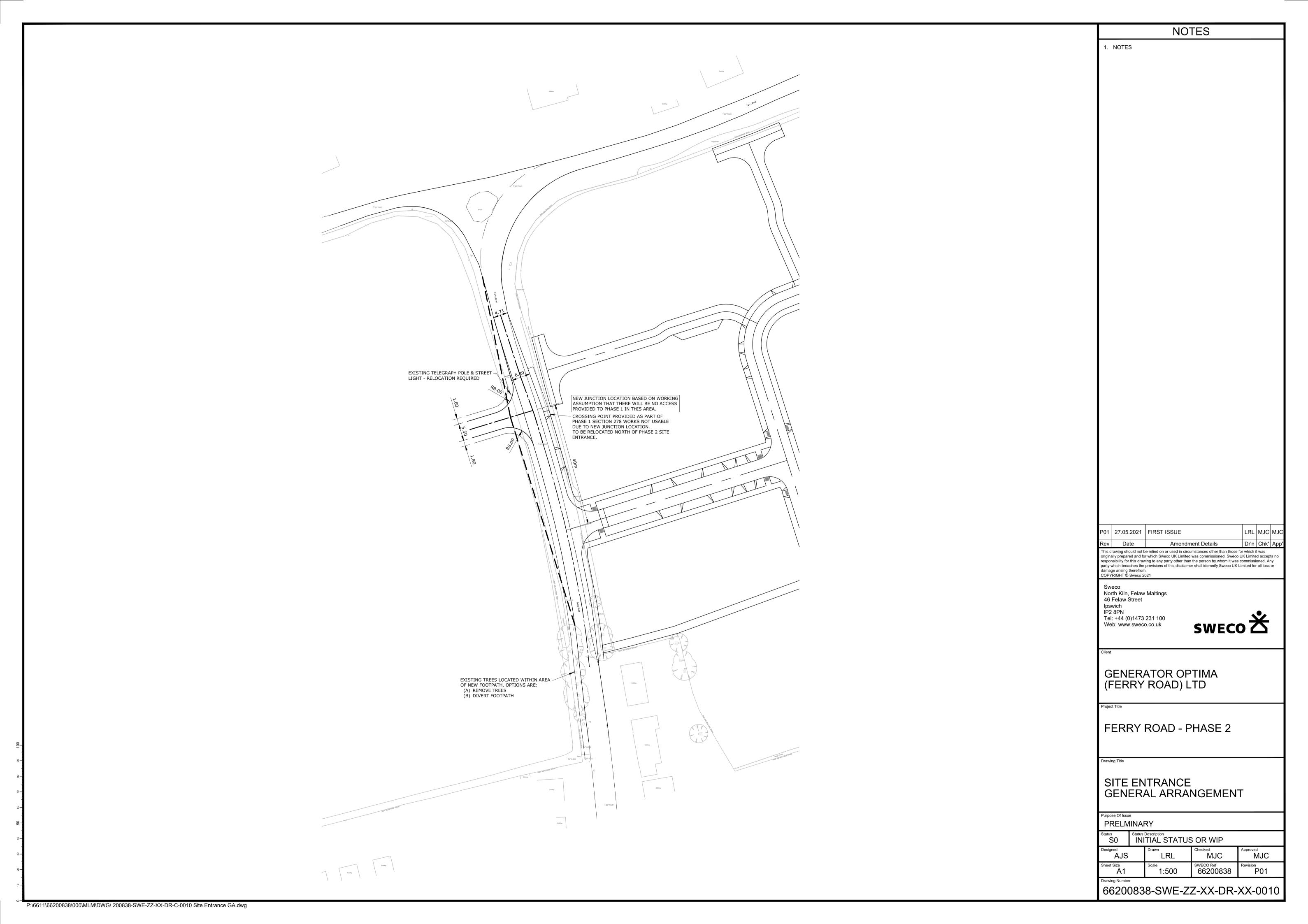
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Appendix 4.2

Site Entrance General Arrangement, drawing number 66200838-SWE-ZZ-XX-DR-ZZ-010 P01





Appendix 4.3

Concept Layout, drawing number GN003-CPT-01





Chapter 6 - General Approach to Environmental Impact Assessment

Appendix 6.1 Scoping Report, dated 10 September 2021

Appendix 6.2 Scoping Opinion, dated 28 January 2022



Appendix 6.1

Scoping Report, dated 10 September 2021



LAND NORTH OF CONWAY CLOSE AND SWALLOW CLOSE, FELIXSTOWE

ENVIRONMENTAL IMPACT ASSESSMENT SCOPING REPORT



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I. Introduction

- I.I JCN Design & Planning has been commissioned by Generator Optima (Ferry Road II) Ltd. to co-ordinate an Environmental Impact Assessment (EIA) and preparation of an Environmental Statement (ES) in relation to development proposals on the land to the north of Conway Close and Swallow Close, Felixstowe (referred to as "the Site"), where East Suffolk Council (ESC) is the local planning authority. A Location Plan for the Site and the area therefore proposed for environmental assessment is set out in Appendix 10.1.
- 1.2 An application for outline planning permission to create up to 150 new homes, associated infrastructure and open space has been submitted under ESC's reference DC/21/2710/OUT. 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. Full details are set out in sections 2 and 3 of this report.
- 1.3 The formal scoping procedure, as defined by the Environmental Impact Regulations 2017 ("the EIA Regulations") allows the applicant to submit a request for the local planning authority for a Scoping Opinion on the information that needs to be included in the ES. This document forms the information submitted in support of that request.
- 1.4 Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations") reads:
 - (1) A person who is minded to make an EIA application may ask the relevant planning authority to state in writing their opinion as to the scope and level of detail of the information to be provided in the environmental statement (a "scoping opinion").
 - (2) A request under paragraph (1) must include
 - (a) in relation to an application for planning permission
 - (i) a plan sufficient to identify the land;
 - (ii) a brief description of the nature and purpose of the development, including its location and technical capacity;
 - (iii) an explanation of the likely significant effects of the development on the environment; and
 - (iv) such other information or representations as the person making the request may wish to provide or make.
- 1.5 As such, this Scoping Report provides ESC with the information required under Regulation 15 of the EIA Regulations.



2. Description of the site and surroundings and the nature of the proposed development

Site description and surrounding area

- 2.1 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.
- 2.2 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.
- 2.3 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.
- 2.4 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.
- 2.5 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.



2.6 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.

The proposed development

- 2.7 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.
- 2.8 An illustrative 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 10.2. 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.
- 2.9 Across a site area of 3.8 hectares (9.4 acres), a development at the upper level of 150 dwellings equates to a density of 39.5 dwellings per hectare (16.0 dwellings per acre).



3. Planning policy context

- 3.1 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 (adopted March 2019)
 - Suffolk Coastal Local Plan (adopted September 2020)
- 3.2 The Site is within the boundary of the former Suffolk Coastal District Council and is therefore subject to the policies contained within the Suffolk Coastal Local Plan. The Waveney Local Plan is not applicable to the Felixstowe area.
- 3.3 The National Planning Policy Framework and National Planning Practice Guidance are material considerations in the determination of an application for planning permission. The site and the surrounding area are not subject to the designation of a Neighbourhood Plan Area, therefore there are no local-level policies that need to be addressed as part of the application for outline planning permission.
- 3.4 The allocation of the Site for residential development is part of the Suffolk Coastal Local 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*. Within the area covered by the Suffolk Coastal Local Plan, *Policy SCLP3.1: Strategy for Growth* confirms that the 150 new homes on the Site are included within the delivery of at least 542 new homes per annum, which equates to a minimum of 9756 dwellings 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.



- Felixstowe is designated as a Major Centre by Policy SCLP3.2: Settlement Hierarchy and is 3.5 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.
- 3.6 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).
- 3.7 Policy SCLP12.4 reviews the site and its setting, confirming that it can create a natural extension to the built-up area of Felixstowe without causing a detrimental impact to the Area of Outstanding Natural Beauty or harming important views of the Deben Estuary. The supporting text notes that the potential impact of development within the site on the natural beauty and special qualities of the national designation require appropriate mitigation measures to be delivered within the site so that the landscape is conserved and enhanced. The policy also considers technical issues, including the creation of a scheme at a scale that is sympathetic to the adjoining properties to the south the policy makes specific reference to the "low rise nature of the area" in the context of the transition from the existing streets to the countryside.



- 3.8 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.
- 3.9 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.

3.10 The full text of the policy reads:

Policy SCLP I 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;
- 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;



- A Landscape and Visual Impact Assessment will be required, and any mitigation provided, n) including a lighting strategy to conserve and enhance the Natural Beauty and Special Qualities of the Area of Outstanding Natural Beauty; and
- Confirmation of adequate capacity in the foul sewerage network or action to upgrade to o) create the required capacity.
- 3.11 Policy SCLP12.3: North Felixstowe Garden Neighbourhood covers 143 hectares of land to the north of Felixstowe and immediately to the west of the 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.



4. Cumulative development

4.1 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.
- 4.2 Table I sets out the schemes that are proposed to be included the cumulative assessment. The location of these sites is also set out in Appendix 10.3.

Table 1: schemes proposed 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
Walton High Street	385 homes	None	DC/16/2778/OUT DC/21/1322/ARM

- 4.3 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.
- 4.4 None of the schemes that are listed in Table I with an extant planning permission were found to be EIA development.



5. **Alternatives**

5. I 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

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 the EIA. ESC 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 ESC through this process.

Site layout

- 5.3 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.
- 5.4 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
 - 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.
- 5.5 Where alternative layouts have been considered that would likely result in significant changes in environmental effects, these will be assessed as part of the EIA. Where no significant change is likely, the alternatives will not be included in the assessment.



"Do nothing" scenario

- 5.6 The Site is allocated for residential development in the local plan, therefore it is considered to be "committed development" for the purposes of the EIA. As such, a "do nothing" scenario will not form part of the EIA.
- 5.7 It should be noted that the technical assessments in an EIA are based on the existing environmental baseline (that is, without development), but in relation to the assessment of transport effects this will take into account predicted future traffic, both with and without the proposed development of the site.



6. Approach to Environmental Impact Assessment

6.1 The ES will be 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 section. Methodologies of the assessments required for each of the proposed technical topic areas are described in the following section.

Significance of the effect

- 6.2 The purpose of the ES is to identify and evaluate the likely significant environmental impacts associated with the proposed development of the Site. These are then assessed on the basis of the nature of the impact (following mitigation) and the nature of the receiving environment. This determines the significance of their effect.
- 6.3 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 2:

Table 2: general scale for assessing significance

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

- 6.4 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: 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.



6.5 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 each topic area. The methods used to undertake the necessary studies, surveys and/or assessments will also be set out in the same section, together with an assessment of potential significant "in-combination" effects included where relevant to each topic area.

Mitigation of environmental impacts

6.6 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.



7. Topics to be "scoped in"

- **7.** I This section provides an overview of the technical topics included in Part 4 of Schedule 4 of the EIA Regulations that are proposed to be included in the scope of the ES – that is, "scoped in". These topics are:
 - (a) Landscape and visual effects
 - Transport and access (b)
 - Biodiversity and ecology (c)
- 7.2 Each of the following subsections sets out a summary of the currently known environmental baseline in relation to that topic area and an overview of the potential significant effects, as required by paragraph (2) (a) (iii) of the EIA Regulations. The proposed methodology for each of the technical assessments is also provided.
- 7.3 A key objective of the scoping process is to seek constructive comments from ESC, relevant statutory consultees and other interested groups, to ensure that there is a clear and transparent process and that the likely environmental effects can be identified, assessed and, where necessary, mitigated. The aim is to ensure that all the relevant issues are set out and agreed, proving the basis for the EIA process.

(a) Landscape and visual effects

Introduction

7.4 The proposed development of the Site has the potential for direct effects on the Site's landscape character, quality and the physical features within it. It also has the potential to indirectly affect the character of the site's wider surroundings. In addition, the proposed scheme has the potential to impact on the nature and quality of people's views in to and across the Site.

Technical expertise

7.5 The ES chapter will be 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.



Proposed assessment methodology

- 7.6 A Landscape and Visual Appraisal has already been prepared to accompany the application for outline planning permission, considering the effect of the proposed development on the landscape character and visual amenity of the local area. It will be expanded to form a chapter of the ES and will follow best practice guidance set out in:
 - Guidelines for Landscape and Visual Assessment, Third Edition (GLVIA3) –
 Landscape Institute and Institute of Environmental Management
 - Photography and Photomontage in Landscape and Visual Impact Assessment Landscape Institute and Countryside Agency
- 7.7 A landscape character assessment will look at the impact of the proposed scheme on the Site itself, its immediate surroundings and the wider landscape, with an emphasis on the effects on important landscape components and features (including the trees on the Ferry Road frontage) and on the overall character of the Landscape Character Area (LCA) in which the Site is located and adjacent LCAs and the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) with which there is intervisibility, as necessary.
- 7.8 An expanded assessment of visual impacts would also be undertaken, with important viewpoints identified and agreed with ESC. These would be assessed to determine the likely visual effects of development on the Site and surroundings, for a arrange of users of the Site and surroundings. The findings will be used to identify mitigation measures and inform the final design at the reserved matters stage.

Known baseline conditions

7.9 The known baseline conditions are set out in the Landscape and Visual Appraisal submitted as part of the application for outline planning permission.

Potential significant effects

- 7.10 The proposed development has the potential to adversely impact the landscape in the long term: the existing field in arable use will be replaced by residential development. The effects will be permanent, but localised and limited in extent.
- 7.11 The cumulative impact on the character of Felixstowe and the Deben Valley will be assessed in greater detail, although it is expected that because the site is well-contained by both topography and existing development, the visual effects will occur within a relatively limited area that is confined to the existing residential properties to the south and east, adjoining roads (Ferry Road and Gulpher Road) and public footpaths (Footpath 8). Policy SCLP12.4 restricts the height of development on the site and 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.



(b) Transport and access

Introduction

7.12 Development of the site has the potential to directly affect people through the provision of new roads, footpaths and cyclepaths. It also has the potential for indirect effects through changes in traffic characteristics at both the construction and occupation stages that could result in delays to drivers or difficulty for pedestrians crossing the highway.

Technical expertise

7.13 The ES chapter will be 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 lpswich office. They have already prepared the Transport Assessment that is submitted in support of the application for outline planning permission.

Proposed assessment methodology

- 7.14 A Transport Assessment has already been prepared to accompany the application for outline planning permission, considering potential impacts with regard to transport that result from the development of the Site. It will be expanded to form a chapter of the ES in compliance with:
 - Guidance on Transport Assessment Department for Transport
 - Manual for Streets Department for Transport
 - Planning Practice Guidance Travel Plans, Transport Assessments and Statements
 - Guidelines for the Environmental Assessment of Road Traffic Institute for Environmental Management & Assessment

It should be noted that there is no standard significance criteria for the consideration of potential effects from transport and traffic therefore a qualitative approach will be required, based on professional knowledge and expertise.

- 7.15 The expanded assessment will consider impacts during the construction and operation of the proposed development and as a result of wider changes to the transport network in the area surrounding the Site. Traffic routing assignment assumptions already anticipate that traffic from the Site will distributed to:
 - 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%)



- 7.16 The scope of the current assessment was agreed with the highways team at Suffolk County Council (SCC) and, in addition to the new access point to the site, it also considers the impact of the proposed scheme on the following junctions:
 - A1021 Grove Road/Beatrice Avenue/Colneis Road/Links Avenue/Medical Centre
 - A1021 Grove Road/Garrison Lane/A154 Candlet Road
- 7.17 The scope of the expanded assessment with be agreed with ESC and SCC. The transport chapter of the ES will draw on the findings of the new report to assess the likely significant effects of the proposed scheme in relation to:
 - The design of the access to the site
 - Predicted trip generation by mode
 - Impact of increased traffic flows on the local and strategic highway network
 - The effect on other transportation networks
 - Scope for enhancement or reinforcement of bus services and cycle and pedestrian routes
 - The significance of other committed developments in the area
 - Impact of construction traffic on the local road network.

Known baseline conditions

7.18 The known baseline conditions are set out in the Transport Assessment submitted as part of the application for outline planning permission.

Potential significant effects

- 7.19 The proposed development has the potential to lead to a range of traffic and transport effects, particularly on the nearby road network, which include:
 - Increased traffic flows during construction, including a temporary increase in HGV movements. A construction management plan will be agreed with ESC as part of the application for outline planning permission.
 - Changes to traffic flows during construction and when the proposed development has been completed.
 - The creation of new pedestrian and cycle routes to the surrounding area, including connections to the new community facilities in the garden neighbourhood.
 - Increased demand and use of public transport, particularly on local bus services that will serve the garden neighbourhood.
- 7.20 The assessment process will consider the requirements for mitigation to address adverse effects. These could include off-site highway improvements, traffic calming measures and the adoption of a travel plan to encourage residents to make more sustainable travel choices.



(c) Biodiversity and ecology

Introduction

7.21 The proposed development has the potential for direct effects on existing habitats and species within Site, as well as indirect effects on species using the surrounding areas and other nearby sites designated for their ecological importance.

Technical expertise

7.22 The ES chapter will be prepared by Sweco, Europe's leading design, engineering, environment and regulatory consultancy. The company employs 17,500 designers, engineers and consultancy specialists and the ecological element of the project is being managed from the company's Ipswich office. They have already prepared the Preliminary Ecological Appraisal Report that is submitted in support of the application for outline planning permission.

Proposed assessment methodology

- 7.23 A Preliminary Ecological Appraisal Report has already been prepared to accompany the application for outline planning permission, considering the potential ecological constraints to development, the effect of the proposed development on the biodiversity value of the site and nearby habitats, and to highlight opportunities for biodiversity and ecological enhancements that can be implemented as part of the detailed scheme at the reserved matters stage. It will be expanded to form a chapter of the ES and will follow best practice guidance set out in:
 - CIEEM (December 2017) Guidelines for Ecological Report Writing, 2nd ed. Chartered Institute of Ecology and Environmental Management, Winchester.
 - Ministry of Housing, Communities and Local Government (February 2019). National Planning Policy Framework.
 - ODPM (2005) Government Circular: Biodiversity and Geological Conservation statutory obligations and their impact within the planning system.
 - CIEEM (December 2017) Guidelines for Preliminary Ecological Appraisal, 2nd ed. Chartered Institute of Ecology and Environmental Management, Winchester.
 - BSI (2013) BS 42020:2013 Biodiversity Code of practice for planning and development. BSI Standards Limited 2013.
 - Stace, C. A. (2010) New Flora of the British Isles (third edition), Cambridge University Press.
 - MAGIC (online resource). Site Check Report. www.magic.gov.uk
 - INCC, (2010). 'Handbook for Phase I Habitat Survey: A technique for environmental audit' (reprint). Joint Nature Conservation Committee, Peterborough.
 - Collins, J. (ed.)(2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edn). The Bat Conservation Trust, London.



- Oldham R.S., Keeble J., Swan M.J.S. & Jeffcote M. (2000). Evaluating the suitability of habitat for the Great Crested Newt (Triturus cristatus). Herpetological Journal 10 (4), 143-155.
- CIEEM (September 2018) Guidelines for ecological impact assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine, 2nd ed. Chartered Institute of Ecology and Environmental Management, Winchester.
- 7.24 An expanded assessment will include a revised scope of surveys agreed with ESC. These findings will be used to identify mitigation measures, potential biodiversity enhancements and to inform the final design at the reserved matters stage.

Known baseline conditions

7.25 The known baseline conditions are set out in the Preliminary Ecological Appraisal Report submitted as part of the application for outline planning permission.

Potential significant effects

- 7.26 The impacts from the construction of the proposed development may include disturbance to, loss of and damage to small areas of habitat with biodiversity value. In addition, there is potential for protected species utilising these habitats to be killed, injured or disturbed and their habitats or breeding places destroyed, damaged or disturbed.
- 7.27 Following completion of the development of the Site, there may be the potential for a reduction in foraging area, interruption of commuting routes and disturbance to retained habitats and species. In addition, designated sites and their associated features could be impacted through indirect disturbance from increased recreation.
- 7.28 Mitigation and enhancement measures are likely to include bat sensitive lighting, erection of bat and bird boxes across the site, inclusion of connectivity features for mammals (eg. hedgehog holes), retention of existing hedgerows that form the field boundaries to the north and east of the Site, retention of field boundary trees on the eastern boundary of the Site, and provision of public open space to connect with the landscape-led scheme for the garden neighbourhood. The proposed development of the Site presents an opportunity to connect the existing habitats of interest with new green corridors across what is currently a very open and ecologically poor area so as to deliver a net gain for biodiversity.



8. Topics to be "scoped out"

- 8.1 This section provides an overview of the technical topics included in Schedule 4 of the EIA Regulations that are proposed to be excluded from the scope of the ES that is, "scoped out". These topics include:
 - (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
- 8.2 Each of the following subsections sets out a summary of the currently known environmental baseline in relation to the topic area and a justification setting out the reasons for it to be "scoped out".

(a) Agriculture, minerals and ground conditions

Known baseline conditions

8.3 The known baseline conditions are set out in the Tier I Contamination Risk Assessment submitted as part of the application for outline planning permission. The Site currently comprises agricultural land, in arable use.

lustification for scoping out

- 8.4 The Site is already allocated for residential development by the Suffolk Coastal Local Plan. The allocation has been subject to a Strategic Environmental Assessment (SEA) and Sustainability Assessment (SA), confirming that the loss of agricultural land has already been considered acceptable and that the site does not qualify as a mineral resource of economic importance. With regard to ground conditions, the proposed residential use is not likely to result in significant effects on humans or environmental receptors. No potential sources of contamination have been identified and there are no significant surface water features within 500 metres of the site that would be sensitive to mobile contaminants.
- 8.5 Confirmation is sought from ESC that this is an appropriate approach and that agricultural land, minerals and ground conditions does not need to be included within the scope of the EIA.



(b) Air quality

Known baseline conditions

8.6 The known baseline conditions are set out in the Detailed Air Quality Assessment submitted as part of the application for outline planning permission.

Justification for scoping out

- 8.7 At the construction stage, a medium to high risk of dust soiling impacts and low risk of increases in particulate matter concentration that could affect human health were identified. However, it is expected that good site management and the implementation of appropriate mitigation measures could significantly reduce the effect of dust and particulate matter. As a result, the residual effects of the construction phase on air quality are considered to be negligible and the air quality impacts are found to be "not significant".
- 8.8 The air quality impact of additional traffic on the road network in the surrounding area is deemed to be negligible at all modelled receptors, meaning that no additional mitigation measures are considered necessary. Furthermore, pollution concentrations at the proposed scheme when it is brought into use are predicted to be below the relevant health-based air quality objectives, meaning that residents of the site will not be exposed to unacceptable air quality and it is found to be suitable for residential use. As such, the effects on air quality from the development of the site is found to be "not significant" and the scheme does not conflict with national and local policies on air quality and no air quality constraints are imposed.
- 8.9 Confirmation is sought from ESC that this is an appropriate approach and that air quality does not need to be included within the scope of the EIA.

(c) Arboricultural impact

Known baseline conditions

8.10 The known baseline conditions are set out in the Arboricultural Impact Assessment submitted as part of the application for outline planning permission. Nine trees, two groups and one hedgerow were identified by the tree survey, all of which stand on the edges of the Site.



Justification for scoping out

- 8.11 Nine individual trees and two groups of trees were identified by the tree survey, confined to the periphery of the site. Eight trees are classified at Category B under BS5837:2012, found to be in generally good condition and with landscape value, therefore suitable for retention within a residential development. One tree and one group were deemed to be Category C and in a poorer condition and without a role in the landscape, meaning that it is not necessary for them to be retained at the reserved matters stage. A group of trees was found to be "U" category because they are mostly dead and cannot provide a landscape contribution, requiring them to be removed regardless of the progress with securing outline planning permission for residential use.
- 8.12 The report proposed remedial work for the trees that will be retained, although it is not considered to be urgent, and replacement hedgerow planting to a fixed species mix is proposed to replace the elements of hedgerow that are to be removed to secure access to the site. A Tree Protection Plan, an Arboricultural Method Statement and a timetable for the implementation of the tree protection works are set out in appendices to the report. It is anticipated that a condition will be attached to the outline planning permission which requires that tree protection measures be implemented prior to the commencement of development.
- 8.13 Confirmation is sought from ESC that this is an appropriate approach and that arboricultural impact does not need to be included within the scope of the EIA.

(d) Climate change

Known baseline conditions

8.14 The Site can be characterised as unremarkable agricultural land. It comprises a single, relatively small field with field boundaries formed on scrappy hedgerows and occasional trees. There are currently no sources of greenhouse gas emissions from the Site.

Justification for scoping out

- 8.15 The proposed development is anticipated to generate greenhouse gas emissions during the construction phase from:
 - Construction works
 - Removal and treatment of waste
 - Manufacture and transport of construction materials to the site.



- 8.16 Once the proposed development is completed and occupied, it is anticipated that greenhouse gas emissions will be generated by:
 - The operation of the buildings
 - Removal and treatment of waste and water from the homes
 - Vehicle movements generated by the new homes.
- 8.17 The Site is already allocated for residential development by the Suffolk Coastal Local Plan through Policy SCLP12.4. The allocation has been subject to a Strategic Environmental Assessment (SEA) and Sustainability Assessment (SA), confirming that there are opportunities for minimisation of greenhouse gas emissions and adaptions to address climate change through the form of development and the specification of the new homes. Policy SCLP9.2 requires that all new development of more than 10 dwellings should achieve higher energy efficiency standards, resulting in a 20% reduction in CO₂ emissions, and meet water efficiency targets to keep water consumption below 110 litres per person per day. These are matters that must be addressed as part of the detailed design of the scheme at the reserved matters stage and strategy to deliver the required level of sustainable construction can be secured via a condition attached to the outline planning permission or be included within the list of reserved matters.
- 8.18 Until the reserved matters stage, detailed data on the expected greenhouse gas emissions from the proposed development will not be known but, in the context of local and nation greenhouse gas emissions and the UK Carbon Budget, the emissions from the proposed development are likely to be small and therefore not significant.
- 8.19 Confirmation is sought from ESC that this is an appropriate approach and that climate change need not be included within the scope of the EIA.

(e) Flood risk and drainage

Known baseline conditions

8.20 The known baseline conditions are set out in the Flood Risk Assessment and Drainage Statement submitted as part of the application for outline planning permission. The whole Site is in Flood Zone 1.

Justification for scoping out

8.21 A Flood Risk Assessment and Drainage Statement is submitted in support of the application. It confirms that the whole site is in Flood Zone I and therefore satisfies the sequential test for the location of a "more vulnerable" land use. The drainage strategy confirms 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.



8.22 Confirmation is sought from ESC that this is an appropriate approach and that flood risk does not need to be included within the scope of the EIA.

(f) Heritage

Known baseline conditions

8.23 The known baseline conditions are set out in the Heritage Statement submitted as part of the application for outline planning permission. The Site does not contain any designated or non-designated heritage assets, although the Grade II listed buildings at Park Farm Cottages stand just beyond the north western corner.

Justification for scoping out

- 8.24 The Site is already allocated for residential development by the Suffolk Coastal Local Plan. The allocation has been subject to a Strategic Environmental Assessment (SEA) and Sustainability Assessment (SA), confirming that development of the Site and the adjoining garden neighbourhood in close proximity to the designated heritage assets at Park Farm Cottages would be acceptable.
- 8.25 The Heritage Statement prepared in support of this application considers the potential impact of residential development on the setting of Park Farm Cottages, which are Grade II Listed buildings. It finds that the loss of an open field that relates to the former farmstead does not unacceptably diminish the understanding of the heritage asset and that the field patterns are preserved by restricting development to the land within the current field boundaries. The level of change to the setting of the cottages is considered "negligible", the significance of the setting to the cottages is "neutral" and the overall impact is "neutral".
- 8.26 Confirmation is sought from ESC that this is an appropriate approach and that heritage issues do not need to be included within the scope of the EIA.

(g) Human health

Known baseline conditions

8.27 The Site can be characterised as unremarkable agricultural land. As such, it does not present a significant risk to human health. Furthermore, there are no existing land uses in the surrounding area which are considered to be a significant risk to the health of future residents.

Justification for scoping out

- 8.28 There are no proposed uses within the scheme that could result in significant effects in human health. A Health Impact Assessment has been submitted as part of the application for outline planning permission, confirming that the provision of new public open space, access to sports facilities and the creation of new walking and cycling routes all offer new opportunities for healthy living, and that these measures will have a positive effect on human health.
- 8.29 Confirmation is sought from ESC that this is an appropriate approach and that agricultural land, minerals and ground conditions does not need to be included within the scope of the EIA.

(h) Socio-economics

Known baseline conditions

8.30 The Site is currently in agricultural use, which will provide a small amount of local employment within an agricultural business that covers a much larger area.

Justification for scoping out

- 8.31 The proposed scheme will include beneficial effects through new employment. New jobs will be created during the construction phase and the education provision funded by a planning obligation will also generate new jobs in the longer term. However, these are not considered to be significant. The social and economic benefits of the proposed scheme are considered in the Planning Statement submitted in support of the application for outline planning permission and it is anticipated that further benefits will be secured by planning obligations, to be agreed with ESC.
- 8.32 Confirmation is sought from ESC that this is an appropriate approach and that socio-economic factors do not need to be included within the scope of the EIA.

(i) Utilities

Known baseline conditions

8.33 The Site abuts the existing built-up area of Felixstowe and Ferry Road (on the eastern boundary) provides access to utility services that were strengthened as part of the development of Laureate Fields, opposite. It is therefore considered that the Site is well-located to existing utility and foul water infrastructure, with sufficient capacity and connections available in close proximity.



Justification for scoping out

- 8.34 The Site is already allocated for residential development by the Suffolk Coastal Local Plan. Foul water drainage was considered at the district-wide level and provision is secured by Policy SCLP12.4, whilst no other infrastructure provider objected to the allocation of the site due to a lack of utility capacity. Information on utility services is provided by a Utility Services Report that is submitted as part of the application for outline planning permission, confirming that no issues have been identified at this stage.
- 8.35 Confirmation is sought from ESC that this is an appropriate approach and that utilities do not need to be included within the scope of the EIA.



9. Summary

- 9.1 Generator Optima (Ferry Road II) Ltd. is applying to East Suffolk Council for outline planning permission to create up to 150 new homes, associated infrastructure and open space on the land to the north of Conway Close and Swallow Close, Felixstowe. The proposed scheme is in accordance with the allocation of the site for residential development through Policy SCLP12.4 in the adopted (September 2020) Suffolk Coastal Local Plan.
- 9.2 This is EIA Scoping Report is a formal request under Regulation 15 of the EIA Regulations for a Scoping Opinion from ESC in relation to the application for outline planning permission (reference DC/21/2710/OUT).
- 9.3 This Scoping Report provides the following information pursuant to Regulation 15 of the EIA Regulations:
 - (i) a plan sufficient to identify the land;
 - (ii) a brief description of the nature and purpose of the development, including its location and technical capacity;
 - (iii) an explanation of the likely significant effects of the development on the environment; and
 - (iv) such other information or representations as the person making the request may wish to provide or make.
- 9.4 The technical topics referenced in Schedule 4 of the EIA Regulations that are proposed to be "scoped in" to the EIA are:
 - (a) Landscape and visual effects
 - (b) Transport and access
 - (c) Biodiversity and ecology
- 9.5 The technical topics referenced in Schedule 4 of the EIA Regulations that are proposed to be "scoped out" from the EIA 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
- 9.6 It is proposed that the cumulative assessment will be made in relation to the schemes listed in Section 4 of this report.

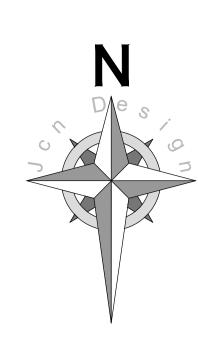


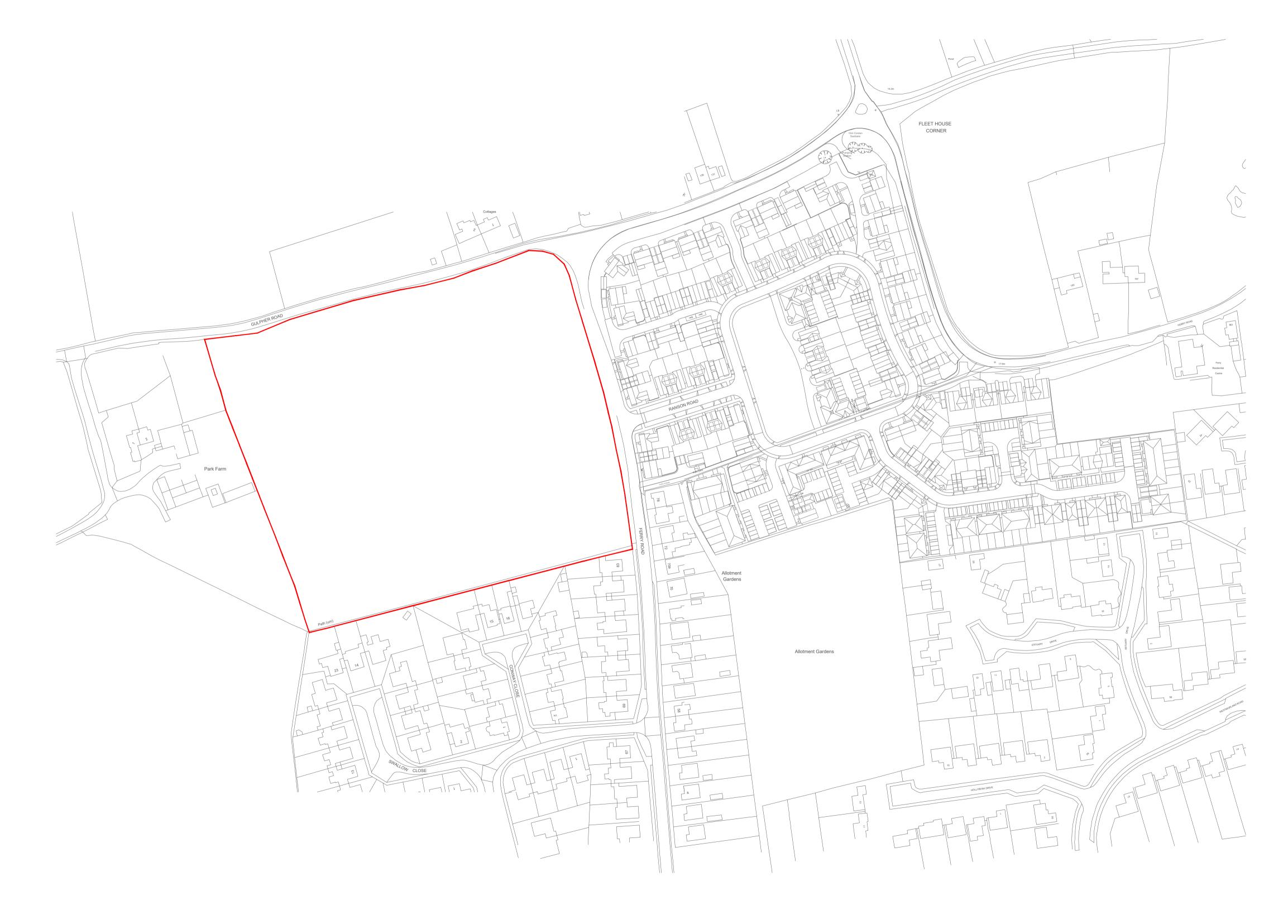
10. Appendices

10.1 Appendix A

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







Project:Land West of Ferry
Road, Felixstowe,
Suffolk

Description:-

Location Plan

GN003-PH2-LP-01 1-1250 @ A1 B

100 metre

www.jcndesign.co.uk



10.2 Appendix B

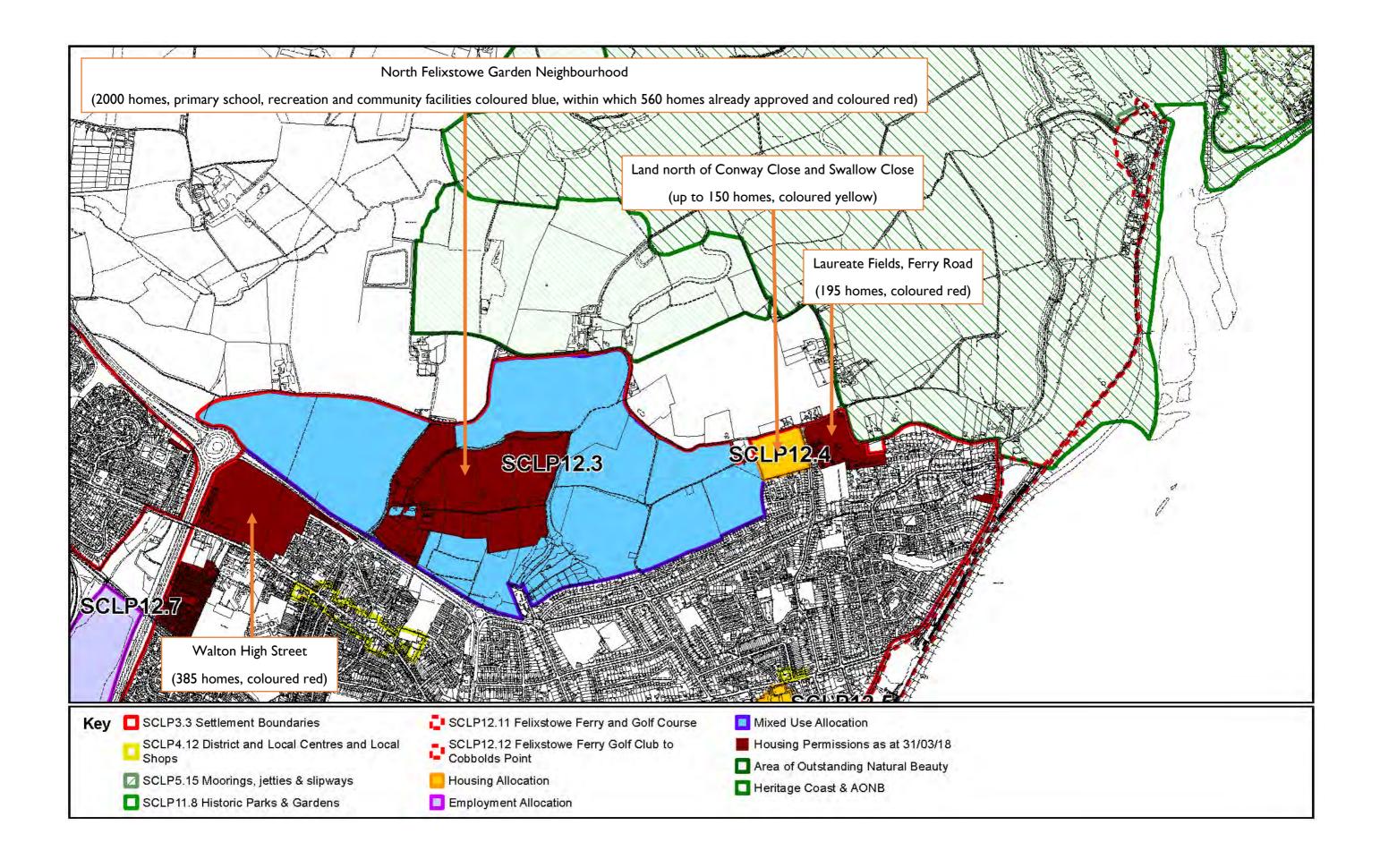
Concept Layout (drawing number GN003-CPT-01)





10.3 Appendix C

Location of sites included in the cumulative assessment





Appendix 6.2

Scoping Opinion, dated 28 January 2022



Michael Smith
JCN Design and Planning
2 Exchange Court
London Road
Feering
Colchester
CO5 9FB

Our ref: DC/21/4329/EIA
Date: 28 January 2022
Please ask for: Phil Perkin
Direct dial: 07585 123438

Email: Philip.perkin@eastsuffolk.gov.uk

Dear Michael

Environmental Impact Assessment Scoping Opinion Request under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the proposed development of up to 150 houses at land to the north of Conway Close and Swallow Close, Felixstowe.

I write in response to your request received 14 September 2021 for a Scoping Opinion under regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as to the scope and level of detail of information to be provided in the Environmental Statement of the application for outline planning permission to create up to 150 new homes, associated infrastructure and open space under reference DC/21/2710/OUT.

The application site is allocated by Policy SCLP12.4 in the Suffolk Coastal Local Plan (adopted September 2020) for the creation of approximately 150 new homes.

Immediately to the west, the adjoining land is also allocated for development by Policy SCLP12.3: North Felixstowe Garden Neighbourhood as a mixed use scheme to create leisure, green infrastructure, community facilities and employment land alongside residential development of up to 2000 houses (including 560 with outline planning permission).

A Screening Opinion was issued on 9 July 2021 which concluded that in view of the clear association of the site with the North Felixstowe Garden Neighbourhood and other nearby sites forms part of the wider cumulative effects and therefore should not be considered in isolation for EIA purposes.

It is noted in the EIA Scoping Report that the following EIA topics are proposed to be scoped into the EIA for the outline application:

- Landscape and visual effects
- Transport and access
- Biodiversity and ecology

LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT

and that the topics that are proposed to be scoped out of the EIA are as follows:

- Agriculture, minerals and ground conditions
- Air quality
- Arboricultural impact
- Climate change
- Flood risk and drainage
- Heritage
- Human health
- Socio-economics
- Utilities

In assessing the submitted EIA Scoping Report I have consulted with various interested parties. This Scoping opinion is based on the information contained within the Scoping Report.

Where a scoping opinion or direction has been issued, an Environmental Statement must be based on the most recent scoping opinion or direction issued, so far as the proposed development remains materially the same as the proposed development which was subject to the opinion or direction.

The Environmental Statement must include the information that may reasonably be required to enable the local planning authority or Secretary of State to come to a reasoned conclusion on the significant effects of the proposed development on the environment. Therefore, where it becomes evident during the assessment process, for example, when undertaking a baseline survey, that a particular environmental factor is absent or unlikely to be significantly affected by a proposed development, there should be no need for further assessment of that factor even though it was identified in the scoping process. In such cases, the reasons for not undertaking further, more detailed assessment of that particular factor should be clearly set out in the Environmental Statement.

The Council sought the views of the following Statutory Consultees: -

- East Suffolk Council Environmental Protection Department
- East Suffolk Council Ecologist
- East Suffolk Council Landscape and Arboricultural Manager
- Suffolk County Council as Local Highway Authority
- Suffolk County Council as Local Floods Authority
- Suffolk County Council Archaeological Department
- Suffolk County Council Coasts and Heaths Project
- Natural England
- Environment Agency
- Historic England

The comments received from consultees have been uploaded to the Council's Website and can be viewed online via typing in the reference number (DC/21/4329/EIA) in the application search engine at: http://publicaccess.eastsuffolk.gov.uk/online-applications/, then selecting the documents tab, and clicking on 'view associated documents'. Comments from consultees are informative but should not be treated as definitive in forming this scoping opinion.

This scoping opinion considers the issues relevant to ESC in the same order as they as provided in the Scoping Report.

Landscape and visual effects

It is agreed that landscape should be scoped into the EIA.

The Suffolk Coast and Heaths AONB team have been consulted. They note that in terms of baseline, The EIA Scoping Report proposes expanding the Landscape and Visual Impact Assessment (LVIA) submitted to support outline application DC/21/2710/OUT. Wireframe Views should be used to assess the visual impact of the development from the AONB and Deben Estuary. These wireframes should also account for the developments at Ferry Road and the Persimmon Homes development north of Candlet Road. Submissions in respect of the promotion of the North Felixstowe Garden Neighbourhood were produced by the Council (as landowner/promoter) which included some detailed wireframe landscape assessment incorporation this site. Reference should be made to those.

Any additional work on landscape for the Environment Statement should ensure that the impact of the development on the natural beauty of the AONB have been fully assessed. The natural beauty indicators against which Protected Landscapes are designated are Landscape Quality, Scenic Quality, Relative Tranquillity, Relative Wildness, Natural heritage features, Cultural Heritage features. If these have not been considered through the LVIA process it is important that they are assessed as part of the ES Landscape work. To assist this please see a link to the Natural Beauty and Special Qualities Assessment for the Suffolk Coast & Heaths AONB.

Section 6.2 of the LVIA sets out the key issues to be agreed at Reserved Matters stage including detailed layout, design and landscape issues. These include measures such as the retention of existing boundary vegetation, setting back development from Gulpher Road and Ferry Road, restricting building height to two storeys; careful selection of materials that are typical of the local vernacular, and the sensitive use of light to ensure that night time effects such as light pollution and sky glow are kept to a minimum. The delivery of such measures will be essential to minimise and mitigate impacts on the AONB and Deben Valley and these should be incorporated into the landscape chapter of the ES.

With regards design and materials, there are additional issues that could be considered e.g. the colour of the buildings facing towards the AONB. Please see a link to the <u>Selection and Use of Colour Guide for development for the Suffolk Coast & Heaths AONB</u> This may provide further

additional information for the baseline for landscape issues.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. The use of Landscape Character Assessment (LCA) are encouraged, based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication Guidelines for Landscape and Visual Impact Assessment, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment

Transport and access

Previously consented developments at Candlet Road (DC/15/1128/OUT and DC/20/1002/ARM) and Land North of Walton High Street (DC/16/2778/OUT with a reserved matters application currently being considered, DC/21/1322/ARM) plus the Ferry Road development (DC/16/3776/ARM) have not previously taken account of each other in their Transport Assessments. At present no cumulative consideration has been given to the traffic effects of those sites collectively, particularly their effect on Candlet Road and the contribution of this site into that mix will require a cumulative approach to be taken for the first time.

It must also be recognised that this site is likely to provide a key vehicular access into the wider North Felixstowe Garden Neighbourhood and it will also incorporate a key pedestrian and cycling corridor. Whilst the full extent of homes generated by the North Felixstowe allocation might not be precisely scoped into this exercise, the future proofed nature of the access and routes must be. Care will need to be taken in assessment with any junctions currently proposed through extant development or requiring further improvement ensuring that any further intervention as a result of this development reflects the wider allocation of the area.

Suffolk County Council as Highway Authority make the following comments:

The application should be supported by a Transport Assessment and Travel Plan to meet the requirements in the NPPF p 113.

It is noted in the EIA scoping report 7.14 that the TA is prepared and this will be assessed in full at time of application. The TA should include all committed developments in the local area including those already being constructed. Along with the specific junctions included in 7.16 of the EIA Scoping Report.

The Suffolk Transport Model may be able to assist in this process, given the challenges in obtaining

traffic data in these times, there is an access fee to use the Suffolk Model. This can be requested by contacting TrafficSurvey@suffolkhighways.org

This proposal will impact during the construction phase.

A construction management plan should be submitted at application stage or be subject to a planning condition covering (but not limited to) the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques (if applicable)
- d) storage of plant and materials
- e) provision and use of wheel washing facilities
- f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works
- g) site working and delivery times
- h) a communications plan to inform local residents of the program of works
- i) provision of boundary hoarding and lighting
- j) details of proposed means of dust suppression
- k) details of measures to prevent mud from vehicles leaving the site during construction
- I) haul routes for construction traffic on the highway network and
- m) monitoring and review mechanisms.
- n) Details of deliveries times to the site during construction phase.

This response is based on the limited information available at the time of the scoping opinion.

Control of Delivery routes:

Full details of measures to ensure HGVs accessing the site use appropriate routes should also be included in the TA or elsewhere in a planning submission.

Biodiversity and ecology

A response was received from Natural England dated 25 October 2021 and advice has also been received from our own Ecologist.

In terms of the consideration of terrestrial ecological impacts within the EIA, the Council's Ecologist agrees that they need to be scoped into the assessment. He has also read the Preliminary Ecological Appraisal (PEA) (SWECO, April 2021) and notes the conclusions of the consultant. Inline with the findings of the PEA, the EIA should consider potential impacts on statutory and non-statutory designated sites (including from increased recreational disturbance and impacts on wintering birds which are part of designated site populations but which may use the application site); impacts on protected species (including reptiles, bats, badger and breeding birds) and impacts on UK Priority habitats and species (under Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006)) (including impacts on hedgerows, mature trees, hedgehog,

harvest mouse, brown hare and invertebrates). The EIA ecology chapter should also identify what biodiversity net gain and ecological enhancement measures are proposed as part of the development.

The Ecologist notes from the PEA that wintering bird surveys have commenced, the findings of these will be needed to inform the EIA and the Habitats Regulations Assessment (HRA).

With regard to the HRA, given the close proximity of the application site to European designated sites (particularly the Deben Estuary SPA and Ramsar site) the applicant should provide information to inform a Habitats Regulations Assessment (HRA) as part of the planning application. In particular this should provide information on how increased recreational disturbance pressure is to be mitigated as part of the development, in line with the requirements of the Suffolk Coast RAMS (Annex I here: https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-Coast-RAMS-HRA-Record.pdf) including the provision of on-site green infrastructure and dog walking routes. It must be recognised that the wider North Felixstowe Garden Neighbourhood will be making full Suitable Alternative Natural Greenspace (SANG) provision and on site mitigation will need to address integration and quality expectations with that.

Natural England's response is available on the web site. In summary they advise that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within the assessment in accordance with appropriate guidance on such matters.

Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended).

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites).

Natural England consider that this development could have potential effects on the following designated sites:

- Alde-Ore Estuary SPA
- Alde-Ore Estuary Ramsar
- Alde-Ore and Butley Estuaries SAC
- Deben Estuary SPA
- Deben Estuary Ramsar
- Sandlings SPA
- Stour and Orwell Estuaries SPA
- Stour and Orwell Estuaries Ramsar

- Orfordness-Shingle Street SAC

Natural England also consider that the development could damage or destroy the interest features for which the underpinning SSSIs for the above European sites have been notified.

Given the proximity to the Deben Estuary SSSI SPA and Ramsar, the EIA should consider whether the proposed development site could represent functionally linked land (FLL) for their bird interest features.

Regionally and Locally Important Sites

The EIA will need to consider any impacts upon local wildlife and geological sites which are of county importance for wildlife or geodiversity.

Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats).

Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

Agriculture, minerals and ground conditions

Suffolk County Council agrees that minerals can be scoped out of the EIA. It is further agreed that agriculture and ground conditions can be scoped out of the EIA.

Air Quality

The baseline conditions for air quality are set out in the Detailed Air Quality Assessment submitted as part of the application for outline planning permission.

The response from the Environmental Protection Officer considers that dust impacts during the construction phase can be satisfactorily addressed through the Construction Management Plan that would be required by condition on any consent granted.

In terms of Air Quality, the Local Planning Authority must be satisfied, and the applicant demonstrate/confirm that the assessment captures traffic and other sources from this and all other committed developments in the area to ensure it is robust. It is considered that this can be achieved by an amendment to the Air Quality Assessment accompanying the planning application.

Arboricultural impact

As an Arboricultural Impact Assessment was submitted with the application it is agreed this can be scoped out.

Climate change

As noted in the Scoping Report Policy SCLP9.2 requires that all new development of more than 10 dwellings should achieve higher energy efficiency standards, resulting in a 20% reduction in CO2 emissions, and meet water efficiency targets to keep water consumption below 110 litres per person per day.

These are matters that must be addressed at the reserved matters stage and can be secured via a condition attached to the outline planning permission or be included within the list of reserved matters, should outline consent be granted. It is agreed that this can be scoped out of the EIA.

Flood risk and drainage

The response from Suffolk County Council, as Lead Local Flood Authority (LLFA) agrees that flood risk and drainage can be scoped out. It should however be noted that drainage strategy referred to as being submitted with the Outline application (DC/21/2710/OUT) has not been agreed as per their comments dated 21 June 2021.

Heritage

There are a number of designated heritage assets within the vicinity of the proposed development, in particular Park Farm Cottages which is Grade II Listed. Historic England have been consulted and have confirmed that these do not fall within their statutory remit. It is therefore agreed that heritage can be scoped out of the EIA.

A Heritage Statement has been submitted with the application and heritage impact will be considered as part of the application process.

With regard to Archaeology, Suffolk County Council Archaeological Service confirm that archaeology does not need to be scoped into the EIA. However, they do comment that the heritage section of the EIA Scoping Report should acknowledge the proposed development site's potential

for below ground heritage and archaeological works would be undertaken at an appropriate stage.

Human health

As a health impact assessment has been undertaken as part of the planning application it is agreed that this is scoped out of the EIA.

Socio-economics

It is noted that the social and economic benefits of the proposed scheme are considered in the Planning Statement submitted in support of the application for outline planning permission. It is agreed that this can be scoped out of the EIA.

Utilities

It is noted that information on utility services is provided by a Utility Services Report that is submitted as part of the application for outline planning permission, confirming that no issues have been identified at this stage. It is agreed that this can be scoped out of the EIA.

Other matters:

Cumulative development

Table 1 of the Scoping Report sets out the schemes that are proposed to be included the cumulative assessment. It is agreed that these schemes should be included in the EIA.

It is considered that the ES should be produced with the inclusion of the topics highlighted within this scoping opinion. It must also include a standalone Non-Technical Summary.

You will note from the screening opinion that where an ES is submitted after the planning application, the applicant is responsible for publicising the ES.

The applicant is responsible for the preparation of the Environmental Statement. In order to ensure the completeness and quality of the Environmental Statement, the applicant must ensure that it is prepared by competent experts and that it is accompanied by a statement from the developer outlining the relevant expertise, or qualifications of such experts, sufficient to demonstrate that this is the case.

This scoping opinion does not preclude any subsequent request for additional information should it be found necessary after the submission of the ES.

Yours Sincerely,

Blehrin.

Philip Perkin | Principal Planning Officer East Suffolk Council



Chapter 7 – Landscape and Visual Impact

Appendix	7. l	Sources	of inf	ormation

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



Appendix 7.1

Sources of information

APPENDIX 1 SOURCES OF INFORMATION

Mapping and Other Data

- Ordnance Survey maps (1:25 000 Explorer Series)
- · Historic Ordnance Survey maps
- Aerial images
- · Multi-Agency Geographic Information for the Countryside (MAGIC) (https://magic.defra.gov.uk/)
- · Google Earth Pro
- National Heritage List for England Map Search (https://historicengland.org.uk/listing/the-list/map-search)
- Suffolk County Council Definitive Public Rights of Way Maps(https://www.suffolk.gov.uk/roads-and-transport/ public-rights-of-way-in-suffolk/view-definitive-maps-of-public-rights-of-way/)

Adopted Planning Policy

- European Landscape Convention, Council of Europe, Florence, October 2000
- The National Planning Policy Framework (NPPF) and associated Planning Practice Guidance Department of Communities and Local Government, 2021
- Suffolk Coastal Local Plan, East Suffolk Council, September 2020
- Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 and AONB Management Plan Addendum 2020, Suffolk Coast and Heaths Partnership

Landscape Character and Value

- NCA Profile 82: Suffolk Coast and Heaths, Natural England, January 2014 (http://publications.naturalengland.org. uk/publication/5626055104659456
- Suffolk Landscape Character Assessment (https://suffolklandscape.org.uk/)
- Suffolk Coastal Landscape Character Assessment, Alison Farmer Associates, 2018
- Settlement Sensitivity Assessment Volume 2: Suffolk Coastal, Alison Farmer Associates, 2018
- Touching the Tide, Alison Farmer Associates, 2012
- Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators, LDA Design, V1.8, November 2016
- Landscape Character Guidelines for the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB), Suffolk Coast and Heaths Partnership

Other Published Documents / Supporting Information

- Guidelines for Landscape and Visual Impact Assessment, Landscape Institute and Institute of Environmental Management and Assessment, 3rd Edition, 2013
- Visual Representation of Development Proposals Technical Guidance Note 06/19, Landscape Institute, September 2019
- An Approach to Landscape Character Assessment, Natural England, October 2014
 (https://assets.publishing.
 service.gov.uk/government/uploads/system/uploads/attachment_data/file/691184/landscape-character-assessment.pdf)
- Landscape Character Assessment: Guidance for England and Scotland, The Countryside Agency and Scottish Natural Heritage, 2002

Landscape and Visual Impact Assessment Appendices

- Green Infrastructure Guidance, Natural England 2009
- BS5837:2012: Trees in Relation to Design, Demolition and Construction Recommendation, BSi, April 2012



Appendix 7.2

Methodology

APPENDIX 2 METHODOLOGY

1.1 Introduction

Approach

- 1.1.1 This assessment has been carried out as part of an Environmental Statement to inform a 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.
- Landscape and Visual Impact Assessment (LVIA) is a tool used to identify the effects of development on "landscape as an environmental resource in its own right and on people's views and visual amenity" (GLVIA para. 1.10). These two elements although inter-related, are assessed separately.
- Para. 2.23 of the guidance confirms that professional judgement is an important part of the LVIA process and while there is scope for objectively quantifying changes to the landscape and visual environment, much of the assessment will rely on qualitative professional judgement. It is important that these judgements are based upon a clear and transparent method so that the reasoning can be followed and examined by others.
- 1.1.4 The approach should be 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.

Process

- 1.1.5 The overall process of LVIA is based on the following steps:
 - **Scoping:** An initial judgement on the scope of the assessment and the key issues including identification of the study area for the assessment.
 - **Project Description:** A description of the siting, layout and other characteristics of the proposed development including the landscape proposals.
 - **Baseline:** The existing nature of both the landscape and visual environment in the study area and its value.
 - **Identification and description of effects:** The impacts resulting from the development and the resulting changes on both landscape and visual receptors.
 - An assessment of the significance of the effects: Based on the nature of the receptor and magnitude of the effects identified.
- Measures to avoid/prevent, reduce or compensate for potential landscape and visual effects are described as mitigation. Mitigation can fall into two categories:
 - **Primary measures:** Developed through an iterative design process, which are integrated or 'embedded' into the project's design. Such measures are generally informed by the baseline assessment and may include the retention of existing important landscape elements (trees and hedgerows for example); the use of appropriate built form, detailed design, materials and finishes; consideration of levels / landform; and new planting. Those specific to the proposed development are identified and described in the project description and are included in the appraisal of effects.
 - **Secondary measures:** Designed to address any residual effects after primary measures have been incorporated. These additional measures, and the methods to secure their implementation are identified separately at the end of the assessment.
- 1.1.7 As the characteristics of the proposed development, including vegetation, will vary over the life of the project the landscape and visual effects are considered at the following stages:
 - **Post Completion (Year 1):** To represent the worst-case scenario on the completion of the development, where planting has been implemented but has limited impact; and

- **Completion Year 15:** To represent the best-case scenario, where planting is considered to be fully established and effective. These are the permanent residual effects.
- 1.1.8 Any effects that may arise during construction are considered to be temporary and short term.

Impacts and Effects

- 1.1.9 For the purposes of the appraisal, the term 'impact' is used to describe the action or cause and 'effects' are the resultant changes on the landscape and visual context.
- 1.1.10 Effects can be beneficial, adverse or neutral in nature:
 - Positive / Beneficial effects are those which enhance and/or reinforce the characteristics of the landscape or view;
 - Negative / Adverse effects are those which remove and/or undermine the characteristics of the landscape or view;
 - Neutral effects are changes which are consistent with the characteristics of the landscape or view.

1.2 Landscape Assessment

- The European Landscape Convention (ELC) defines landscape as "an area as perceived by people, whose character is the result of the action and interaction of natural and/or human factors," (Council of Europe, 2000). 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."
- 1.2.2 The purpose of the landscape assessment is to determine the effects of the proposed development on the landscape as a resource in its own right. The defined aspects of the landscape resource that have the potential to be affected by the proposals or landscape receptors comprise:
 - The physical elements that make up the rural and built environment topography, hydrology, land cover, land use, vegetation and settlement for example;
 - Aesthetic characteristics such as tranquility or openness; and/or
 - The character of a defined area or landscape type and its sense of place.
- 1.2.3 The appraisal requires a methodical assessment of the sensitivity of the landscape receptors to the proposed development and the magnitude of change which would be experienced by each receptor.

Baseline

- 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.
- 1.2.5 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.

Sensitivity

1.2.6 The sensitivity of landscape receptors is assessed by combining the value attached to the landscape and its susceptibility to the type of change which is proposed.

Value

- The starting point for assessing the value of landscape receptors is the presence of landscape designations (statutory and non-statutory) and their designation criteria. Such designations may include National Parks, Areas of Outstanding Natural Beauty (AONB), Listed Buildings, Registered Parks and Gardens of Special Historic Interest, Local Landscape Designations (such as Special Landscape Areas), Conservation Areas and Tree Preservation Orders.
- 1.2.8 Other areas of landscape, or individual elements, features or aesthetic aspects of the landscape which contribute to its character may not be formally designated but nether the less be valued. In this instance published Landscape Character Assessments and associated planning policies can be used to inform an overall judgement based on:
 - The condition of landscape elements and their contribution to landscape character;
 - The condition and overall strength of the landscape character area as a whole;
 - Any important, valuable or special qualities identified; and
 - The objectives of landscape strategies and guidance.
- 1.2.9 The criteria informing the judgement of the value of landscape receptors are set out in **Table A1** with the value assessed as either High, Medium or Low.

Susceptibility to Change

- 1.2.10 GLVIA3 defines susceptibility as the "ability of the landscape receptor to accommodate the proposed development without undue consequences for the baseline situation and/or the achievement of landscape planning policies and strategies." Judgement of susceptibility is particular to the specific characteristics of the proposed development and the ability of a particular landscape or feature to accommodate the type of change proposed.
- 1.2.11 The overall judgement is subsequently based on:
 - The capacity of the landscape to accommodate the type / nature of the development proposed;
 - The extent to which the development is in accordance with landscape strategies and guidance; and
 - The need and potential for mitigation.
- 1.2.12 The criteria informing the judgement of the susceptibility of landscape receptors to the proposed development are set out in Table A2 as either High, Medium or Low.

Sensitivity

1.2.13 The overall sensitivity of landscape receptors is defined by correlating value and susceptibility to change as set out in **Table A3** as either High, Medium or Low. Judgements are made about each landscape receptor with the table acting as a guide. Intermediate categories may be used where the value or susceptibility doesn't fall within one of the main categories, or a finer degree of differentiation is required.

Magnitude of Change

- 1.2.14 The magnitude of landscape change is defined by assessing the size or scale of change, its geographical extent and its duration and reversibility.
- 1.2.15 The size and/or scale of change in the landscape takes into consideration the following:
 - The extent/proportion of landscape elements (built / natural) lost;
 - The extent/proportion of new landscape elements (built / natural) added;
 - The degree to which aesthetic/perceptual aspects may be altered; and

- Whether this is likely to change the key characteristics of the landscape.
- 1.2.16 The geographical area over which these changes may be experienced can be at the site level, in the immediate area of the site, or over a wider area.
- 1.2.17 Effects may be permanent or reversible in the short-, medium- or long-term.
- 1.2.18 The magnitude of change is assessed on a sliding scale from Very High to Negligible refer to the criteria in Table
 B. Intermediate categories may be used where the magnitude of change doesn't fall within one of the main categories, or a finer degree of differentiation is required. Effects may be adverse, beneficial or neutral in nature.

1.3 Visual Assessment

- 1.3.1 The purpose of the visual assessment is to assess the effects of change and development on the views available to people and their visual amenity.
- 1.3.2 Visual receptors are the people whose views may be affected by the development proposals. They generally include users of public rights of way or other recreational facilities; travellers who may pass through the area because they are visiting, or living or working there; residents; and people at their place of work.
- 1.3.3 The appraisal requires a methodical assessment of the sensitivity of visual receptors to the proposed development and the magnitude of change which would be experienced.
- 1.3.4 The effects can be either beneficial (positive), adverse (negative) or neutral in nature.

Baseline

1.3.5 The purpose of the baseline is to establish the area in which the site and the proposed development may be visible; the different groups of people who may experience views; the locations where they may be affected; and the nature of the existing views at these points.

Visual Envelope

1.3.6 The area in which the site and the development may be visible, the 'visual envelope,' has been determined by a manual assessment of topographical and mapping data in conjunction with field work. The type of viewers and places within the visual envelope which may be affected by the proposed development are identified.

Viewpoints and Views

- 1.3.7 A number of viewpoints are selected to demonstrate the extent of visibility of the site and future development and the visual amenity currently experienced. The viewpoints are generally representative i.e. are typical of those experienced from residential areas, roads or rights of way, but may be from a specific location, for example a promoted viewpoint or attraction.
- 1.3.8 The viewpoints take into account a range of factors including:
 - Accessibility to the public;
 - The type, potential number and sensitivity of viewers who may be affected;
 - A range of different directions, distance (near-, middle- and long-distance) and elevation;
 - The nature of the viewing experience; and
 - The type of view.
- 1.3.9 Baseline photographs were taken at each location in accordance with best practice.

Sensitivity

1.3.10 The sensitivity of visual receptors is assessed by combining the value attached to the view and the susceptibility to the type of change which is proposed.

Value

- 1.3.11 Different levels of value are attached to the views experienced by particular groups of people at particular viewpoints. Assessment of value takes account of a number of factors, including:
 - Visual amenity;
 - Recognition of the view through some form of planning designation or by its association with particular heritage assets; and
 - The popularity of the viewpoint, in part denoted by its appearance in guidebooks, literature or art, or on tourist maps, by information from stakeholders and by the evidence of use including facilities provided for its enjoyment.
- 1.3.12 The criteria informing the judgement of the value of visual receptors are set out in **Table C1** with the value assessed as either High, Medium or Low.

Susceptibility to Change

- 1.3.13 The susceptibility of different visual receptors to changes in views and visual amenity is a function of:
 - The occupation or activity of the people at a given location; and
 - The extent to which the viewer's attention or interest may be focused on the views and the visual amenity they experience.
- 1.3.14 The criteria informing the judgement of the susceptibility of visual receptors are set out in **Table C2** as either High, Medium or Low.
- 1.3.15 The overall sensitivity of visual receptors is defined by correlating value and susceptibility to change as set out in **Table C3** as either High, Medium or Low. Judgements are made about each visual receptor with the table acting as a guide. Intermediate categories may be used where the value or susceptibility doesn't fall within one of the main categories, or a finer degree of differentiation is required.

Magnitude of Change

- 1.3.16 The magnitude of visual change is defined by assessing the size or scale of change, its geographical extent and its duration and reversibility.
- 1.3.17 The size and/or scale of visual change takes into consideration the following:
 - The scale of the change considering the loss and/or addition of features in the view, changes in its composition, including the proportion of the view occupied by the proposed development and distance;
 - The degree of contrast or integration of any new features or changes in the landscape with the existing or remaining landscape elements and their characteristics, for example in terms of form, scale and mass, line, height, colour and texture;
 - The nature of the view of the proposed development, for example whether views will be full, partial or glimpsed or sequential views while passing through the landscape.
- 1.3.18 The geographical extent of a visual effect will vary with different viewpoints depending on:
 - The angle of view in relation to the main activity of the receptor;
 - The distance of the viewpoint from the proposed development; and
 - With reference to the Visual Envelope, the extent of the area over which the changes would be visible i.e. over the whole length of a footpath or just a small section.
- consideration is also given to the seasonal differences arising from the degree of screening and/or filtering of views as a result of vegetation (existing and proposed) in both summer and winter. The assessment provides for the "average" and "worst-case" situations, the latter being the winter season with the least leaf cover and therefore minimal screening.

1.3.20 Effects may be permanent or reversible in the short-, medium- or long-term. The magnitude of change is assessed on a sliding scale from Very High to Negligible - refer to the criteria in **Table D**. Intermediate categories may be used where the magnitude of change doesn't fall within one of the main categories, or a finer degree of differentiation is required. Effects may be adverse, beneficial or neutral in nature.

1.4 Significance of Effects

- 1.4.1 The relative significance of landscape and visual effects is determined by the relationship between the sensitivity of the receptor and the magnitude of the change. **Table E** summarises the nature of the relationship but it is not absolute and the overall conclusion is based on professional judgement.
- 1.4.2 Effects that fall in the red or orange section of the table (**Major** or **Substantial** categories) i.e. those by virtue of the more sensitive receptors and the greater magnitude of change are generally considered to be the most significant in the planning process.
- 1.4.3 Those effects falling in the yellow (**Moderate**, **Minor** and **Negligible** categories) are generally acceptable levels of change.
- 1.4.4 Where a development would result in a large proportion of residual Major, Substantial and/or Moderate adverse effects, efforts to reduce impacts through mitigation should be further explored.

TABLES

Table A1: Landscape Receptors - Value

Value	High	Medium	Low
	Landscape elements that are: In an excellent to good condition A fundamental component of landscape character A distinctive or rare landscape feature These are likely, but not necessarily subject to statutory protection e.g. TPO's or Listed Buildings, given significant protection by planning policy and/or landscape guidance.	Landscape elements that are: In a good to average condition Make a contribution to landscape character These may be, but not necessarily protected by planning policy and/or landscape guidance.	Landscape elements that are: In a poor to average condition Make a limited contribution to landscape character (or their contribution is significantly reduced by virtue of their condition) Uncharacteristic and/or detract from the character of the area Planning policies and/or landscape guidance may be, but not necessarily, focused on their removal / replacement or enhancement.
Description	Landscapes or areas that:	Landscapes or areas that:	Landscapes or areas that:

Table A2: Landscape Receptors - Susceptibility to Change

Magnitude / Extent of Change	Description
Very High	The proposals will result in total, irrevocable and wide reaching physical change in the landscape receptor. This is likely to include: • Major / total change to existing landscape elements and their condition and/or the introduction of major or dominant new elements; • Major/ total change to the existing landscape character and context of the area, its key characteristics, condition and/or aesthetic attributes
High	The proposals will result in a large degree of physical change in the landscape receptor, which may be experienced from a large area and be either permanent or reversible only in the long-term. This is likely to include: • Substantial / prominent change to existing landscape elements and their condition and/or the introduction of prominent new elements; • Substantial / prominent change to the existing landscape character and context of the area, its key characteristics, condition and/or aesthetic attributes
Medium	The proposals will result in a medium degree of physical change in the landscape receptor, which may be experienced from a distance from the site in the medium- to long-term. This is likely to include: • Moderate / noticeable change to existing landscape elements and their condition and/or the introduction of moderate new or characteristic elements • Moderate / noticeable change to the existing landscape character and context of the area, its key characteristics, condition and/or aesthetic attributes
Low	The proposals will result in only a minor level or localised physical change in the landscape receptor. This is likely to include: • Minor / discernible change to existing landscape elements and their condition and/or the introduction of minor new or characteristic elements • Minor / discernible change to the existing landscape character and context of the area, its key characteristics, condition and/or aesthetic attributes
Negligible	The proposals will result in no / barely discernible or short-term physical change in the landscape receptor. There will be: • Very little change to existing elements and their condition and negligible effects from the introduction of new or characteristic elements • The overall landscape character and context of the area, its key characteristics, condition and/or aesthetic attributes will be unaffected

Table A3: Overall Landscape Sensitivity

			Susceptibility to Change	
		High	Medium	Low
Value	High	High	High	Medium
Landscape Va	Medium	High	Medium	Low
La	Low	Medium	Low	Low

Table B: Magnitude of Landscape Change

Nature of Change	Description
Beneficial	The proposals by virtue of their nature, location and/or design respect or have a good contextual fit with the landform, scale and pattern of the surrounding landscape. The development will have a positive effect on landscape character and its aesthetic aspects by removing uncharacteristic landscape elements; retaining characteristic elements and/or enabling their restoration or replacement; and introducing new elements which make a positive contribution to the landscape and its sense of place in accordance with landscape policy objectives and guidelines. The character and/or condition of the landscape will be enhanced.
Adverse	The proposals by virtue of their nature, location and/or design will be at variance with the landform, scale and pattern of the surrounding landscape. The development will have a negative effect on landscape character and its aesthetic aspects by removing all (or parts of) characteristic landscape elements and/or erode their condition / perception in the landscape; and introduce new elements which are uncharacteristic, make a limited contribution to the landscape and its sense of place. The proposals may conflict or make a limited contribution to policy objectives and guidelines. The character / condition of the landscape will reduce.
Neutral	The proposals by virtue of their nature, location and/or design are not uncharacteristic when set within the landform, scale and pattern of the surrounding landscape. The development is not contrary to but may make a limited contribution to landscape policy objectives and guidelines. The effect on landscape character is neither positive or negative.

Table C1: Visual Receptors – Value

Value	High	Medium	Low
Description	High to exceptional visual amenity and scenic quality, highly valued by visitors and the local community such that people would travel some distance or go out of their way to experience them. Views may include: Nationally recognised / important views such as those protected by policy e.g. National Park / AONB or a nationally important trail or route Designed views Views from recognised tourist destinations, marked on maps / guidebooks Recognised views referenced in art or literature	Average to good visual amenity where the quality of existing views is such that there are few / or a limited number of incongruous elements. Views are likely to be valued by visitors and the local community on a day-to-day basis. Views may include: • Locally recognised or important views including those protected by local policy such as visually important open space or special landscape areas • Views from local destinations and well used footpath routes	Average to poor visual amenity where incongruous elements are present or dominant. Local people are likely to be indifferent to the view. Views may include: • Views from footpaths which are not well used • Views where detracting features are clearly apparent / dominant

Table C2: Visual Receptors - Susceptibility to Change

Value	High	Medium	Low
Description	Observers whose attention or interest is generally focused on the landscape. To include: Users of public rights of way, recreational trails and waterways Visitors to heritage assets or attractions where views are an important part of the experience Users of land with public access including Open Access and National Trust Land Residential properties, primarily with views from living areas (predominantly ground floor)	Observers where views of the landscape are part of, but not the sole purpose of their activity. To include: • People engaged in sport or recreation where the appreciation of the view is part of the activity • Users of local roads where attention is likely to be focused on the landscape rather than the road ahead for example scenic routes • Residential properties with views from rooms generally unoccupied during the day (predominantly first floor rooms) or oblique views	Observers whose attention or interest is generally focused entirely on their activity rather than the landscape. To include: People engaged in sport or recreation where the appreciation of the view is not important to the activity Users of main road / rail routes where the view is incidental to the journey Places of work or study where setting is not important to the quality of working life

Table C3: Overall Visual Sensitivity

		Susceptibility to Change		
		High	Medium	Low
Value	High	High	High	Medium
Landscape Va	Medium	High	Medium	Low
La	Low	Medium	Low	Low

Table D: Magnitude of Visual Change

Magnitude / Extent of Change	Description
Very High	The proposals will cause a complete change in the baseline view, to the extent that it will become the dominant feature. The composition and balance of the view and the visual amenity it offers will be totally altered.
High	The proposals will cause a considerable change in the baseline view, to the extent that it will become a prominent and/or large overall component of the view. The composition and balance of the view and the visual amenity it offers will be substantially altered.
Medium	The proposals, which may be one of a number of prominent elements, will cause a clearly noticeable change in the baseline view. The composition and balance of the view and the visual amenity it offers will be altered to a moderate degree.
Low	The proposals, which may be one of many visible elements, will cause a slight but perceptible change to the baseline view. The composition and balance of the view and the visual amenity it offers will be partially altered.
Negligible	The proposals will cause a barely perceptible change in the baseline view. It may be perceived as a background component or be subservient to or complement existing elements. The overall composition and balance of the view and the visual amenity if offers will not be altered.
No Change	The proposals will result in no change to the existing baseline view.

The effects can be either beneficial (positive), adverse (negative) or neutral in nature:

Nature of Change	Description
Beneficial	The proposals will have a positive effect on the view by either removing existing visual detractors and/ or introducing elements which are already characteristic. By virtue of good design the development respects the scale, composition, and balance of existing visual elements and/or makes a positive contribution to the view. Visual amenity would subsequently be enhanced.
Adverse	The proposals will have a negative effect on the view by either removing existing positive visual elements and/or introducing elements that are not necessarily already characteristic, or are incongruous. The design of the development is out of keeping with the scale, composition and balance of existing visual elements resulting in a deterioration in the existing view. Visual amenity would subsequently be reduced.
Neutral	The proposals will be a discernible change, but will complement the existing view. The effect on visual amenity is neither positive or negative.

Table E: Scale of Significance of Landscape and Visual Effects

		Sensitivity						
		High	Medium	Low				
	Very High	Major	Major	Substantial				
Magnitude of Change	High	Major	Substantial	Moderate				
	Medium	Substantial	Moderate	Minor				
	Low	Moderate	Minor	Negligible				
	Negligible	Minor / Negligible	Negligible	Negligible				

1.5 Cumulative effects

- 1.5.1 In a broad generic sense, cumulative impacts 'result from the incremental changes caused by other past, present or reasonably foreseeable actions together with the project.'
- 1.5.2 However, an assessment of cumulative effects should focus on whether there are any potential cumulative impacts which are reasonably foreseeable and which are likely to influence the decision making of the proposed development, rather than an assessment of every potential cumulative effect, which in practice means focusing on other nearby development proposals and the effects that might arise from the combined influence of those developments on landscape and visual receptors.
- 1.5.3 As recommended by the SNH cumulative guidance, this assessment focusses on the 'additional cumulative change which would be brought about by the proposed development' (paragraph 70).
- 1.5.4 As noted above, operational developments are included in the baseline, Consented development which are expected to be constructed, form part of the future baseline and will be included as such. However, where there is some uncertainty regarding the future construction of consented developments, they may be considered as the first scenario of the cumulative assessment.
- 1.5.5 Proposals in planning considered where there is good reason to assume that the timing of decisions may be similar and significant cumulative effects are likely. The assessment of effects is considered within the cumulative assessment.
- 1.5.6 Proposals in scoping are noted but not considered within the cumulative assessment, as there is no certainty that these proposals will progress to planning submissions and the nature of the proposed schemes may be subject to change.

- The assessment is based on the same landscape and visual baseline and receptor groups as the main LVIA, and the methodology is also the same in terms of forming and expressing judgements. Cumulative effects on landscape receptors arise from combined direct and/or indirect effects on the same receptor such as two developments within the same character area; or one development within, and one visible from, a designated area.
- 1.5.8 Cumulative effects on visual receptors arise either from two (or more) developments both being visible from the same place; or from sequential views as people travel.
- 1.5.9 In order to simplify what may otherwise be a complex assessment, the following approaches are also used: 2 GLVIA3 page 120, paragraph 7.1 quoting Hyder, 1999 'Guidelines for the assessment of indirect and cumulative impacts as well as impact interactions'
- 1.5.10 The cumulative assessment considers scenarios within which developments may be 'grouped' for instance two nearby cumulative proposals may be considered in one scenario if it is considered that the cumulative effects arising if one or both are developed are likely to be similar.
- 1.5.11 Receptors judged to receive Negligible or Slight-Negligible magnitude effects are not considered for cumulative effects on the basis that any significant effects arising would primarily be caused by the cumulative developments and would be unlikely to be contributed to by the proposed development.
- 1.5.12 Only those receptors judged likely to experience effects from the cumulative development(s) being considered within a given scenario are described within that scenario.
- 1.5.13 Qualitative assessment of design and aesthetic considerations arising as a result of cumulative development, and/or considerations set out within local guidance provided in relation to cumulative development, is also provided where relevant.

1.6 Visualisation Methodology¹

1.6.1 The requirement was to produce Type 3 non-verified visuals in line with conventions as laid out by the Landscape Institute Technical Guidance document TGN 06/19 'Visual Representation of Development Proposals' dated 17th September 2019.

Photography

The photos used as a base for the images were supplied by SES, apart from view 13. This needed to be re-taken to show the existing development progress to the east of the site. This was recorded using a Canon 700D with a Canon EF 50mm f/1.2L USM lens to match the resolution and aspect of the supplied photos. Please see below for further details of photography.

Modelling and Placement

- Typical 3D house models at 2 storeys height were imported from a library into 3d software. The illustrative masterplan was used as a template for placing the properties, and the topographical survey was used to place the site at the correct altitude (Height above sea-level).
- An online elevation finder (https://mapdevelopers.com/elevation_calculator.php) was used to determine the heights at each camera location. A satellite image was imported beneath the 3d model and the information used to place the 'virtual' camera for each view. This provided an accuracy resulting in no more than about 1m deviance from the actual location. Simple massing blocks were created to represent a nearby farm building and radio mast (again using the satellite image and elevation finder as a placement guide). These allowed the cameras to be aligned correctly in the horizontal plane, providing a direct means of lining the camera to the

 $^{^{\}mathrm{1}}$ Methodology prepared by Paul Smith, Director of Production, CGEye, 20th September 2022

corresponding structures in the photos. The virtual cameras were then set a 50mm Aperture width to match the settings of the real camera.

Rendering and post-production

- once the scenes were set up, a rendered image of the development was produced from each camera in the scene. The images were rendered with transparent 'alpha' channels to allow the rendered imaged to be selected, copied and pasted alone into the relevant photos for each view.
- 1.6.6 Thereafter all that remained was to cut out any foreground material from the photo that would obscure the buildings in the real world and paste it onto a layer on top of the rendered cgi layer.
- 1.6.7 For each shot versions with the massing form, wireframe only and a combination of the two were created.

Visualisation type: Type 3 wireline

Projection: planar

Enlargement factor: 100%

Date & time of photography

VP07 - 16/05/22 15:09pm

VP09 - 16/05/22 15:21pm

VP13 - 13/09/22 10:49am

VP17 - 16/05/22 14:37pm

VP19 - 16/05/22 14:30pm

VP20 - 16/05/22 13:45pm

Make/model of camera and lens

VP 07/09/17/19/20 – Canon EOS6D with Canon EF 50mm f/1.4 USM lens

VP13 - Canon 700D with Canon EF 50mm f/1.2L USM lens

Horizontal FOV: 39.6 deg

Direction of view

VP07 -78.05 deg

VP09 -175.56 deg

VP13 –247.44 deg

VP17 -108.35 deg

VP19 - 120.85 deg

VP20 -227.01 deg

Camera co-ordinates

VP07 - 51.9770058364974, 1.3586930773648662

VP09 - 51.98236641083842, 1.3666615508752367

VP13 - 51.97879470352621, 1.369956793404092

VP17 - 51.98082893925866, 1.3489829590131641

VP19 - 51.98154697342887, 1.3529040280428613

VP20 - 51.98670168085605, 1.388032526819493

Landscape and Visual Impact Assessment Appendices

Distance to nearest site boundary (Approximate)

VP07 – 448M

VP09 – 451M

VP13 – 135M

VP17 – 1.13Km

VP19 – 895M

VP20 - 1.67Km

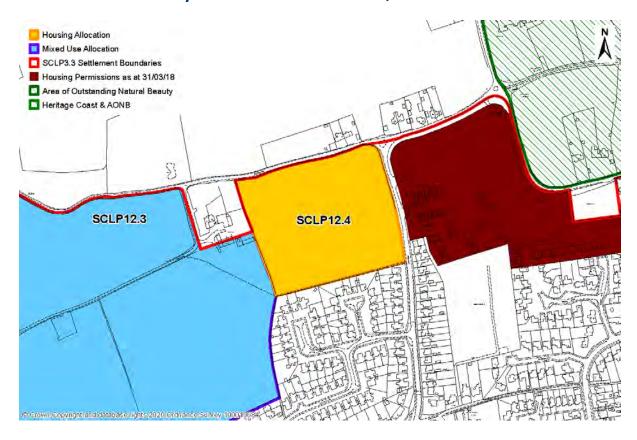


Appendix 7.3

Area-specific policies for Felixstowe

Area specific policies for Felixstowe

Land North of Conway Close and Swallow Close, Felixstowe



- 12.63 This allocation is carried forward from the Felixstowe Peninsula Area Action Plan Development Plan Document (2017). This site is allocated for development of approximately 150 dwellings.
- 12.64 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 to the north of Conway Close and Swallow Close 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.
- 12.65 As the current properties define the edge of the built up area, it will be important to ensure that future development on this site is sympathetic to the size and scale of the existing properties. Old Felixstowe is predominately 1 or 2 storey buildings and as this site is bordered by countryside it is appropriate to retain the low rise nature of the area.
- 12.66 The Suffolk Coastal Leisure Strategy (2014) and the evidence base supporting that document identifies that all new development which results in an increase in the number of dwellings should contribute towards the provision of open space. Open space provision can take many different forms and facilities can differ from site to site but may include parks and gardens, amenity green space, allotments, play areas,

footpaths or dog walking areas. Developers will be required to consider local needs and requirements as part of their proposals alongside the nationally published standards of 2.4ha per 1000 population, and will be expected to make provision for people of all ages to be active.

- 12.67 Along with a sympathetic design to reflect the edge of the built up area, Historic England advise that the layout and design will need to be sympathetic to Park Farm Cottages which is a Grade II Listed Building to the west of the site.
- 12.68 The site lies in an area that is topographically favourable for early occupation, with Bronze Age ring ditches to the north and cropmark evidence of field systems. Archaeological finds on the site to the east suggest that extensive remains may be found on this site. Suffolk County Council have highlighted that an Archaeological Assessment is to be undertaken at an appropriate design stage prior to the granting of outline, technical details or full planning permission.
- 12.69 Links to the existing Public Rights of Way network from new developments are key to promoting sustainable forms of travel, as well as providing circular routes for recreational purposes. Upgrading Footpath 8 should be given consideration to ensure greater connectivity through the proposed site.
- 12.70 In 2014, an outline planning application was permitted (DC/13/3069/OUT) which provides for up to 200 units on an adjacent site. In order to understand the cumulative impacts of both sites coming forward with access onto Ferry Road, Suffolk County Council as highways authority will require a Transport Assessment to be undertaken and submitted as part of a future planning application. Part of this Transport Assessment will also need to consider the impact the development would have on Gulpher Road which has been designated as 'Quiet Lane' by Suffolk County Council.
- 12.71 The site is adjacent to the proposed North Felixstowe Garden Neighbourhood and this site should be designed in a way which enables it to be integrated through appropriate access for vehicles, pedestrians and cyclists with the Garden Neighbourhood.
- 12.72 Kingsfleet Primary School is forecast to be over capacity during the first five years of the plan period. A new primary school will be delivered as part of the North Felixstowe Garden Neighbourhood with the potential to provide capacity for 630 spaces. A contribution towards additional school spaces will be required as detailed in the Infrastructure Delivery Framework. Felixstowe Academy currently provides provision for secondary education in the town, but over the plan period will require improvements to ensure sufficient capacity is maintained. A contribution will be requested via the Community Infrastructure Levy towards improvements at Felixstowe Academy.
- 12.73 Early years provision in Felixstowe is forecast to be over capacity and therefore a contribution towards the provision of a new setting will be required.
- 12.74 The Ipswich and East Suffolk Clinical Commissioning Group have advised that additional primary care floorspace will be required to meet the needs arising from new development, as detailed in the Infrastructure Delivery Framework. A contribution through the Community Infrastructure Levy towards additional primary care floorspace will be requested. Given the close proximity of this site to the proposed

- North Felixstowe Garden Neighbourhood, strategic planning in consultation with the NHS and Ipswich & East Suffolk Clinical Commissioning Group will also be required.
- 12.75 Development proposals at Felixstowe should have regard to the findings of the Suffolk Coastal & Ipswich Cross Boundary Water Cycle Study which indicates capacity limitations at Felixstowe Water Recycling Centre. Evidence will be required to demonstrate how capacity will be made available in time to serve the proposed development. The Water Cycle Study also identifies this site as being within Flood Zone 1. As the site area is over 1ha, any proposals for development must be accompanied by a site-specific Flood Risk Assessment.
- 12.76 Suffolk County Council have indicated that there is no planned expansion of the Felixstowe household waste recycling centre; however, the development proposed in this area would result in an increase in throughput at this site and improvements are therefore required. A contribution will be required through the Community Infrastructure Levy towards the improvement of the centre as identified in the Infrastructure Delivery Framework.
- 12.77 Suffolk County Council have provided information relating to library improvements across the plan area. This site falls within the catchment of Felixstowe library which has been identified as a library where improvements are necessary to enhance provision, as set out in the Infrastructure Delivery Framework. A contribution will be requested through the Community Infrastructure Levy towards the improvement of library provision as identified in the Infrastructure Delivery Framework.
- 12.78 Greater Anglia have highlighted the need for development proposals to contribute to the accessibility of rail stations and the quality of its ancillary facilities and to enhance the visitor experience. In this respect, a contribution through the Community Infrastructure Levy relating to Felixstowe rail station may be required.
- 12.79 The Council's Environmental Protection Team have advised that an Air Quality Assessment would be required alongside any future planning application to assess the cumulative impacts of the developments in this part of Felixstowe.

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

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

- a) Affordable housing provision to be in line with Policy SCLP5.10;
- b) A site-specific Flood Risk Assessment;
- c) A range of housing types (including bungalows) and tenures in keeping with surrounding area and in line with Policy SCLP5.8;
- d) Highway design which provides for appropriate vehicular access to the Garden Neighbourhood;
- e) Maximum building height of 2 storeys;
- f) Development will need to be high quality and sympathetic to the surrounding character of the area and Listed Building at Park Farm Cottages to the west of the site;
- g) On site open space and play facilities to meet needs identified in the Suffolk Coastal Leisure Strategy and to provide opportunities for all ages to be active;
- h) An Air Quality Assessment will be required, and any necessary mitigation provided;
- i) An Archaeological Assessment is required;
- j) Evidence is required to demonstrate there is adequate Water Recycling Centre capacity or that capacity can be made available;
- k) Green infrastructure to be complementary to the green infrastructure provided at Felixstowe Garden Neighbourhood;
- I) 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.



Appendix 7.4

Scoping opinion



08th June 2022

To whom it may concern,

<u>Land to the north of Conway Close and Swallow Close, Felixstowe – Environmental Impact</u> Assessment

We write regarding the scope of the Landscape and Visual Impact Assessment (LVIA) for the above project.

Further to receipt of the East Suffolk Council Scoping Opinion dated 28th January 2022, SES have undertaken a site visit and captured summer photography to expand the LVIA submitted to support outline application DC/21/2710/OUT.

The scope of the expanded LVIA includes 20 no. viewpoints of which 6 no. are proposed as wireframe views to support the assessment of visual effects on the AONB and Deben Estuary, taking into account the developments at Ferry Road (Laureate Fields, under construction) and the North Felixstowe Garden Neighbourhood (under construction).

As indicated by preliminary modelling of the Site, and subsequently confirmed by the recent site visit, views of the Site from the Deben Estuary and from across the estuary at Ramsholt / Bawdsey will be screened by topography, vegetation and built form that includes the Laureate fields development (under construction). Such views are therefore ruled out at this stage.

Please find attached the supporting illustrative material comprising:

- Annotated baseline photography for viewpoints 1 to 20;
- Figure C1 Visual Analysis and Viewpoints;
- Figure C2 Topography and Visual Envelope; and
- Drawing GN003-CPT-01 Concept Layout

Higher resolution information can be downloaded using the following link – <u>Land at Conway Close Swallow Close</u>, Felixstowe Consultation

The wireframe views at viewpoints 7, 9, 13, 17, 18/19, and 20 will be produced in the expanded LVIA as "Type 3" visualisations as defined by, and in accordance with, the "Visual Representation of Development Proposals, Technical Guidance Note 06/19" published by the Landscape Institute (2019).

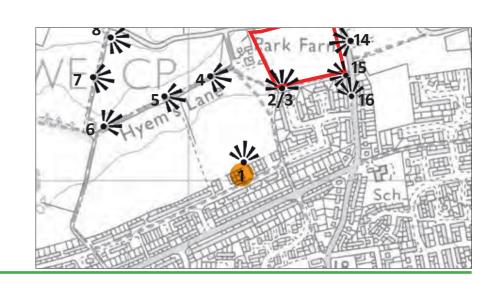
The visualisations of the site will show the visible extents of the Concept Layout using summer photography. 3D modelling of the cumulative developments will not be undertaken.

For clarity, viewpoints 9, 19 and 20 are within the AONB.

We trust that the expanded scope of the LVIA as set out above meets your approval. We would be grateful if you could confirm receipt of this information and politely request that any comments are provided at the earliest convenience and no later than the 15th June 2022.

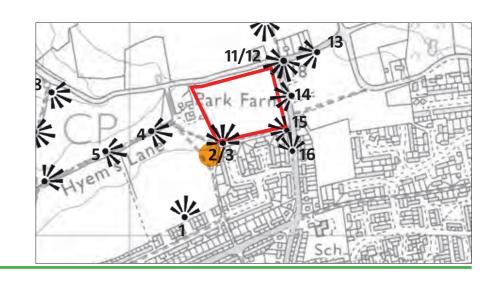


View 01 (Winter) - View looking north from informal footpath off Upperfield Drive between houses to adjacent field



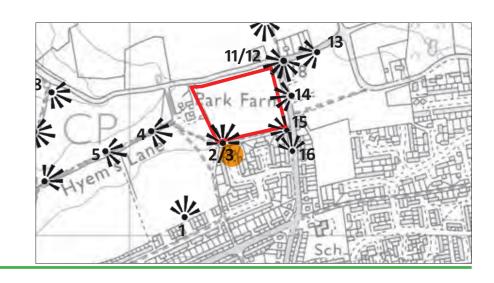


View 02 (Winter) - View looking north from Footpath 12 between Park Farm and properties adjacent to Upperfield Drive



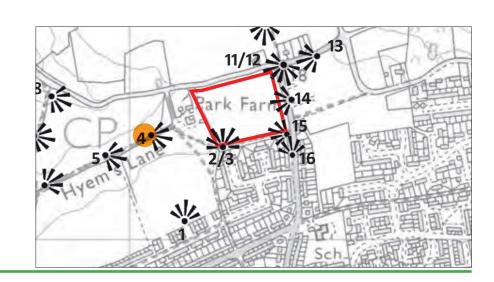


View 03 (Winter) - View looking north east across the Site from Footpath 12 towards the junction at Ferry Road/Gulpher Road





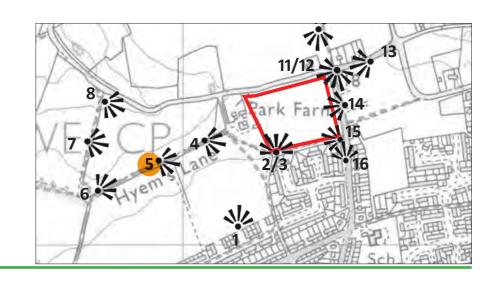
View 04 (Winter) - View looking south east towards the Site from Bridleway 16 where it joins Hyem's Lane



Park Farm Hyem's Lane



View 05 (Winter) - View looking east towards the Site from Hyem's Lane (Bridleway 16)

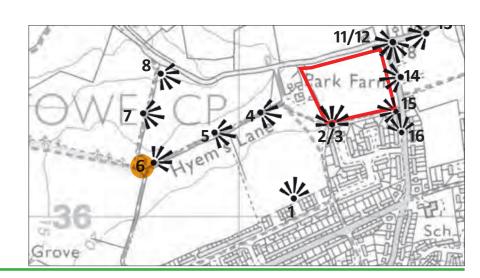




View 06 (Winter) - View looking east from further along Hyem's Lane on the junction of PROW 15, 16, 17 and 18

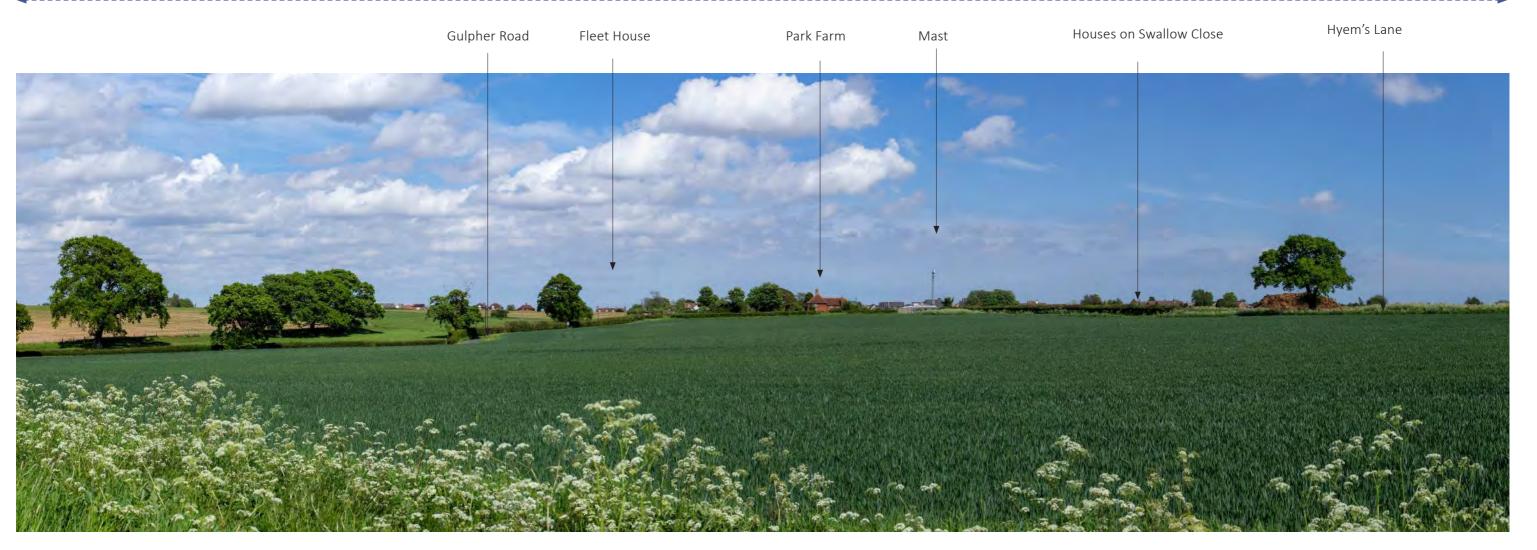


View 06 (Summer) - View looking east from further along Hyem's Lane on the junction of PROW 15, 16, 17 and 18

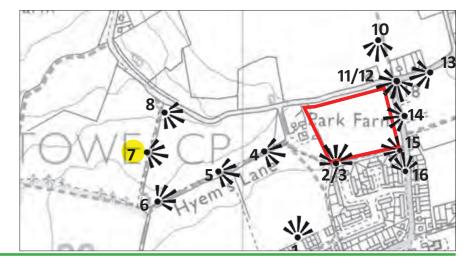


Approximate extent of Laureate Fields

Approximate extent of Site



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



Approximate extent of Site

Approximate extent of North Felixstowe Garden Neighbourhood



View 08 (Winter) - View looking south east towards the Site from Footpath 17

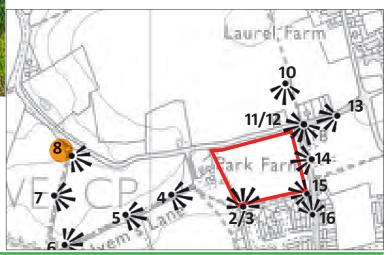




Park Farm



View 08 (Summer) - View looking south east towards the Site from Footpath 17

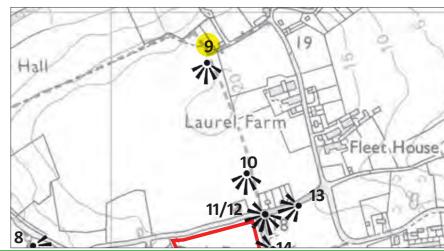




View 09 (Winter) - View looking south towards the Site from the PRoW 5 adjacent to Hill Cottage



View 09 (Summer) - View looking south towards the Site from the PRoW 5 adjacent to Hill Cottage





View 10 (Winter) - View looking south from the PRoW 5 from Laurel Farm

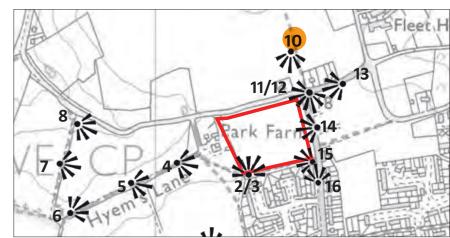
Approximate extent of Laureate Fields

Approximate extent of North Felixstowe Garden Neighbourhood

Approximate extent of Site



View 10 (Winter) - View looking south from the PRoW 5 from Laurel Farm

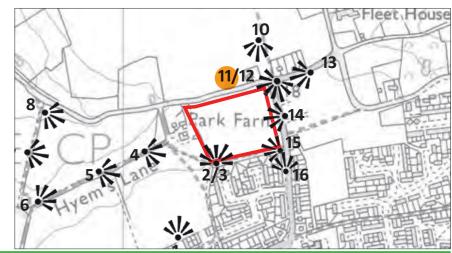




View 11 (Winter) - View south down Ferry Road showing the Site on the right beyond existing vegetation



View 11 (Summer) - View south-west taking in the Laureate Fields development (under construction) and Ferry Road



Approximate extent of Site

Existing good hedge to northern/northeastern boundaries

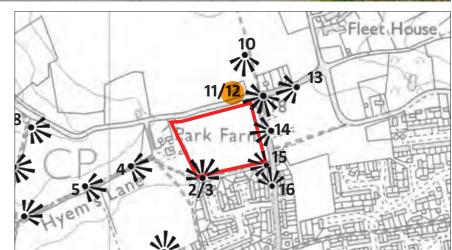


View 12 (Winter) southwest from the junction with Ferry Road/Gulpher Road

Approximate extent of North Felixstowe Garden Neighbourhood Approximate extent of Laureate Fields Approximate extent of Site

Existing good hedge to northern/northeastern boundaries **FERRY ROAD** GULPHER ROAD

View 12 (Summer) southwest from the junction with Ferry Road/Gulpher Road







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

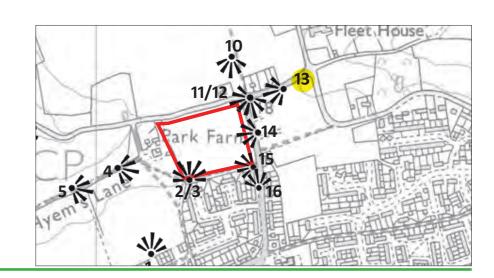
Approximate extent of North Felixstowe Garden Neighbourhood

Approximate extent of Site

Approximate extent of Laureate Fields



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



Approximate extent of Site

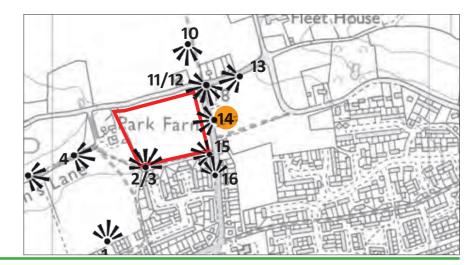
Approximate extent of Laureate Fields

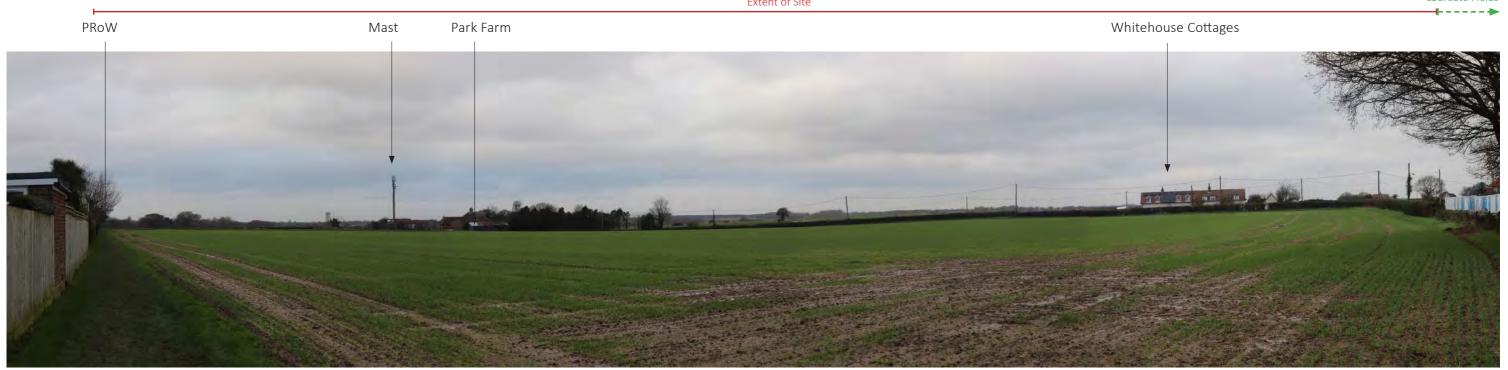
Swallow Close PROW Dock cranes Mast at Park Farm

FERRY ROAD

RANSOM ROAD

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

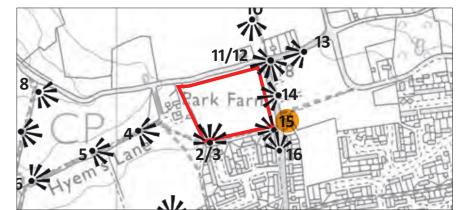




View 15 (Winter) - View looking west across the Site from Footpath 12 to Park Farm and beyond



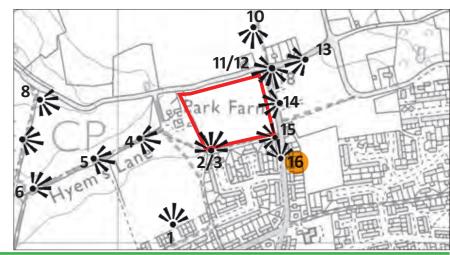
View 15 (Summer) - View looking west across the Site from Footpath 12 to Park Farm and beyond



Extent of Site Approximate extent of Laureate Fields

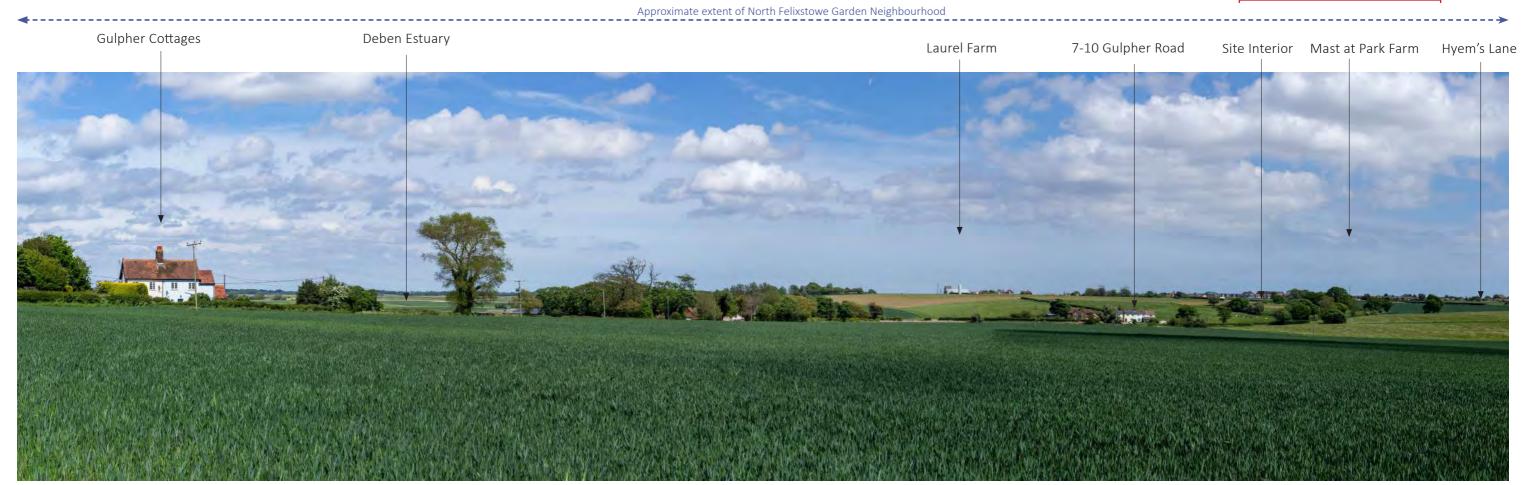


View 16 (Summer) - View north from Ferry Road

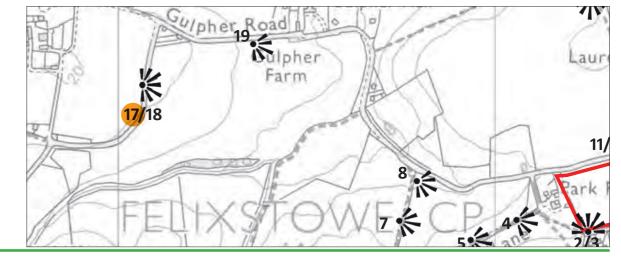


Approximate extent of Laureate Fields

Approximate extent of Site



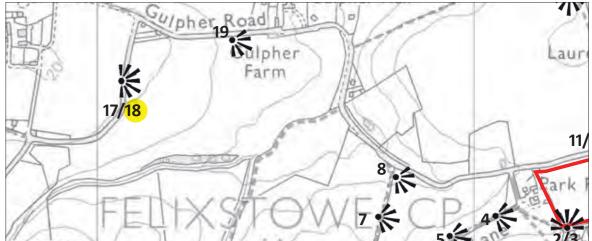
View 17 (Summer) - View east from Gulpher Road near The Grove

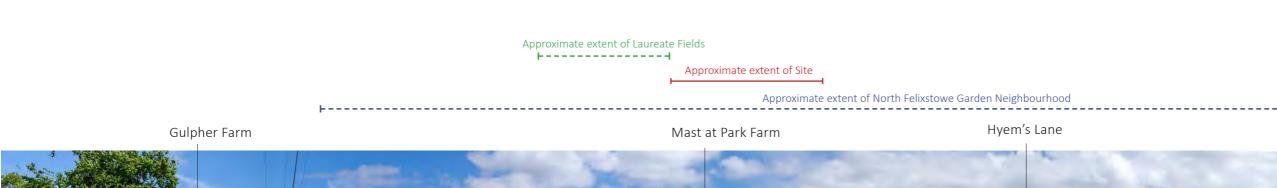


Approximate extent of Site



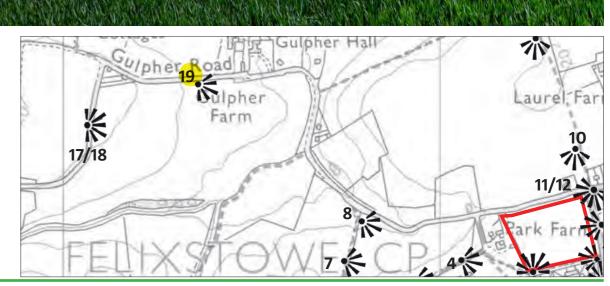
View 18 (Summer) - View south from Gulpher Road near The Grove







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

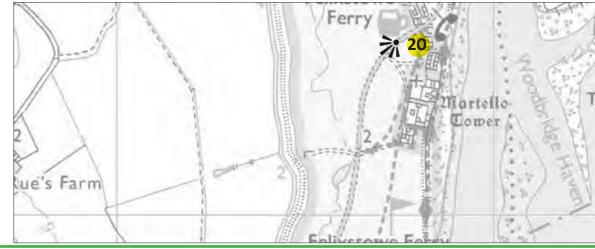


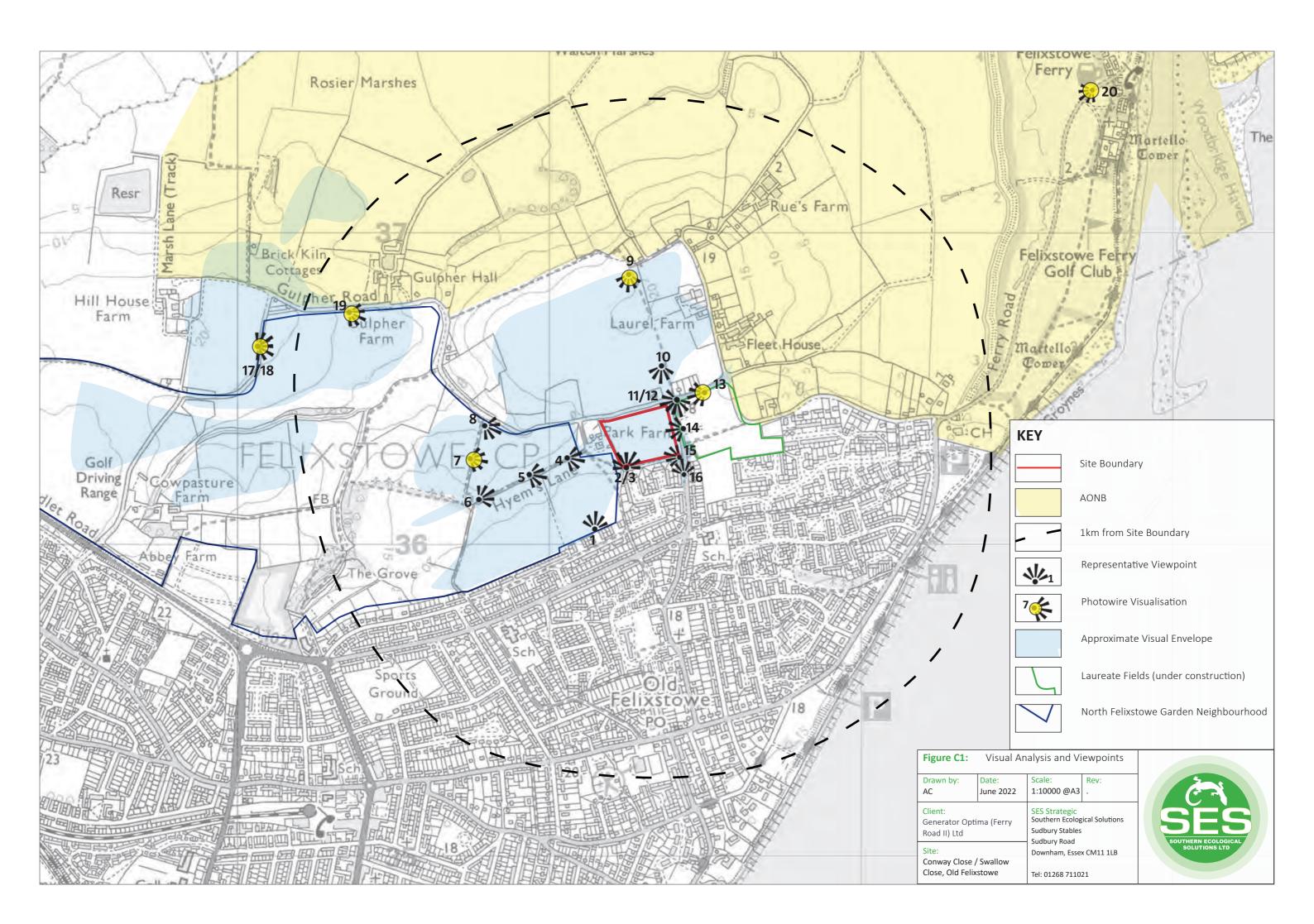
Approximate extent of Site

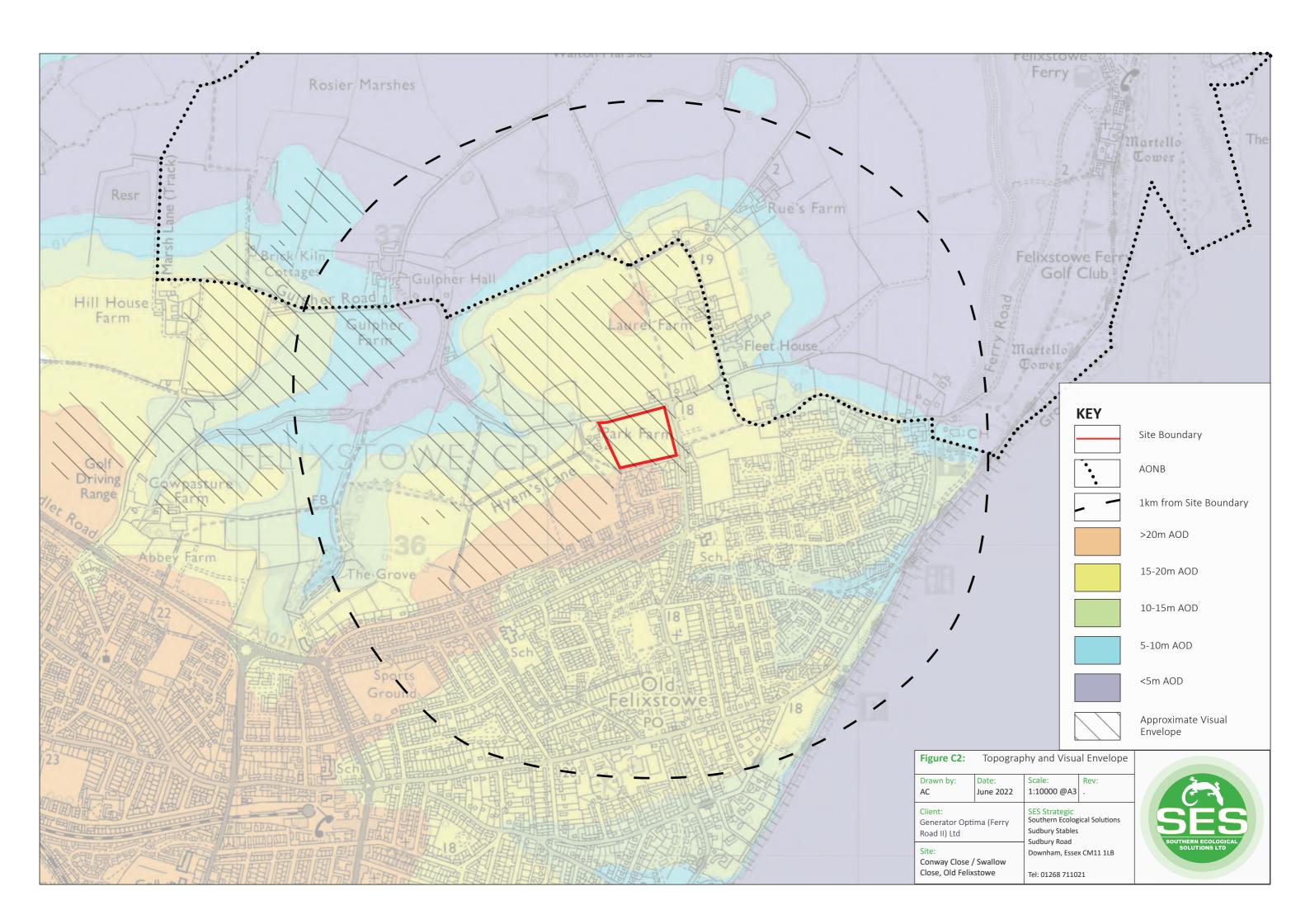
Approximate extent of Laureate Fields



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











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E-mail from Strategic landscape Advisor, East Suffolk Council

APPENDIX 5 Email Strategic Landscape Advisor East Suffolk Council

From: Eleanor Larke <Eleanor.Larke@eastsuffolk.gov.uk>

Sent: 01 September 2022 11:37

To: Rachel Bodiam < Rachel@ses-eco.co.uk >

Cc: Philip Perkin <Philip.Perkin@eastsuffolk.gov.uk>; michael@jcndesign.co.uk

Subject: RE: Land at Conway Close and Swallow Close, Felixstowe

(DC/21/4329/EIA)

Hi Rachel,

Thank you for your email, I am in agreement that the viewpoints we discussed at our meeting on the 28th are sufficient and I consider them representative of the range of views that should be covered.

I acknowledge that the most likely intervisibility with the AONB is to the north east corner of the site and this is therefore where undeveloped open space will be shown.

We understand that in terms of cumulative impacts considering the wider development of the garden neighbourhood that the potential impacts will be weighted by the larger scale development that could take place within the North Felixstowe garden Neighbourhood site allocation area, with sites such as Candlet Road under development. We also understand that certain assumptions have had to be made with regard to viewpoints and future development, for example in relation to viewpoint 17 we discussed that it is assumed that open space would be included to the northern area of the garden neighbourhood. The assumptions discussed are reasonable and we would just ask that where they are made, the document is clear in explaining this.

Hopefully this enables you to move forward, but please feel free to come back to me if there is anything else you need to discuss.

Kind regards, Eleanor

> Eleanor Larke CMLI | Strategic Landscape Advisor East Suffolk Council 01502 523077 | 07387 064224

> Working days Tues, Wed, Thur

www.eastsuffolk.gov.uk www.eastsuffolkmeansbusiness.co.uk

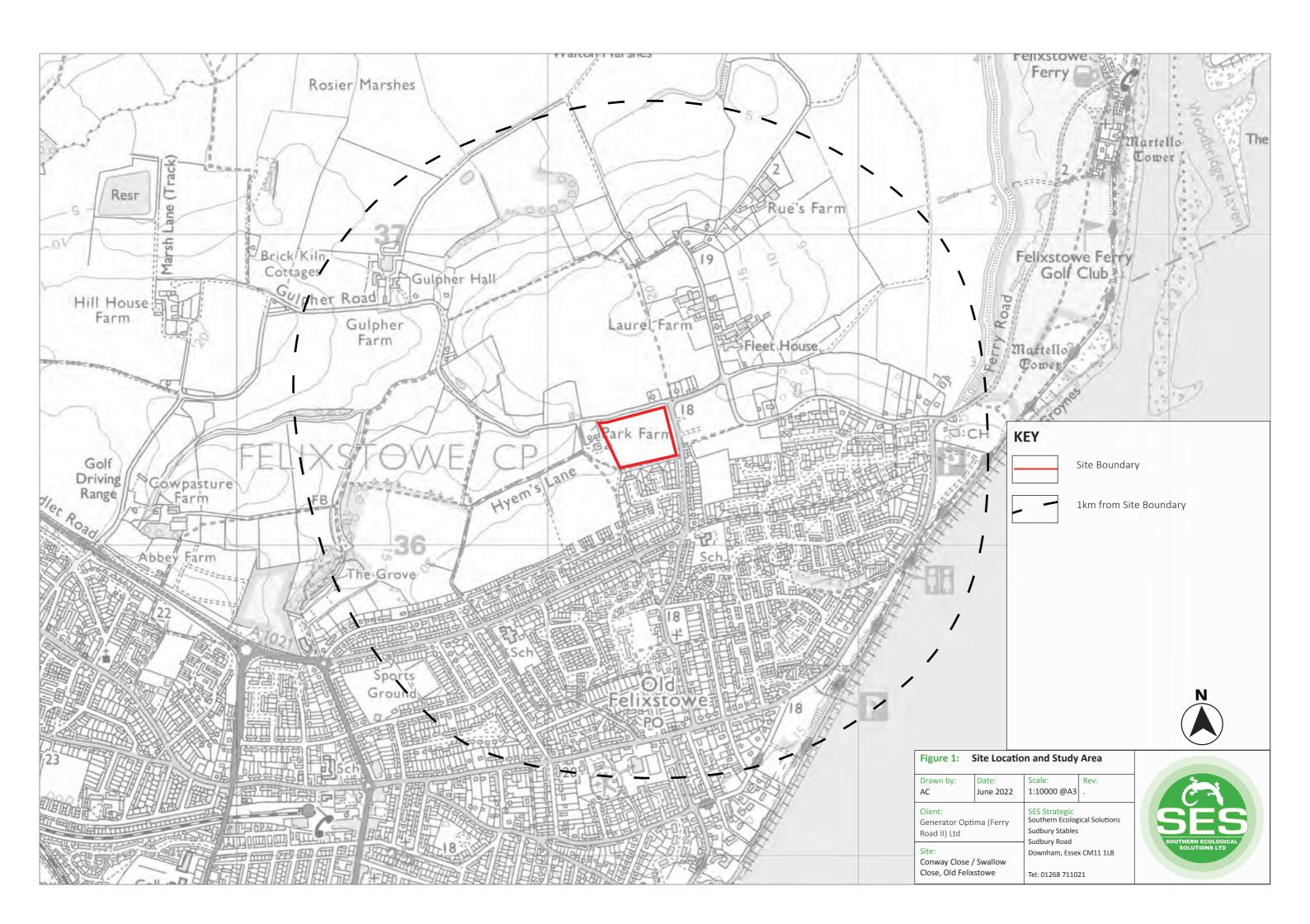
Our ambition is to deliver the best possible quality of life for everyone who lives in, works in and visits East Suffolk.

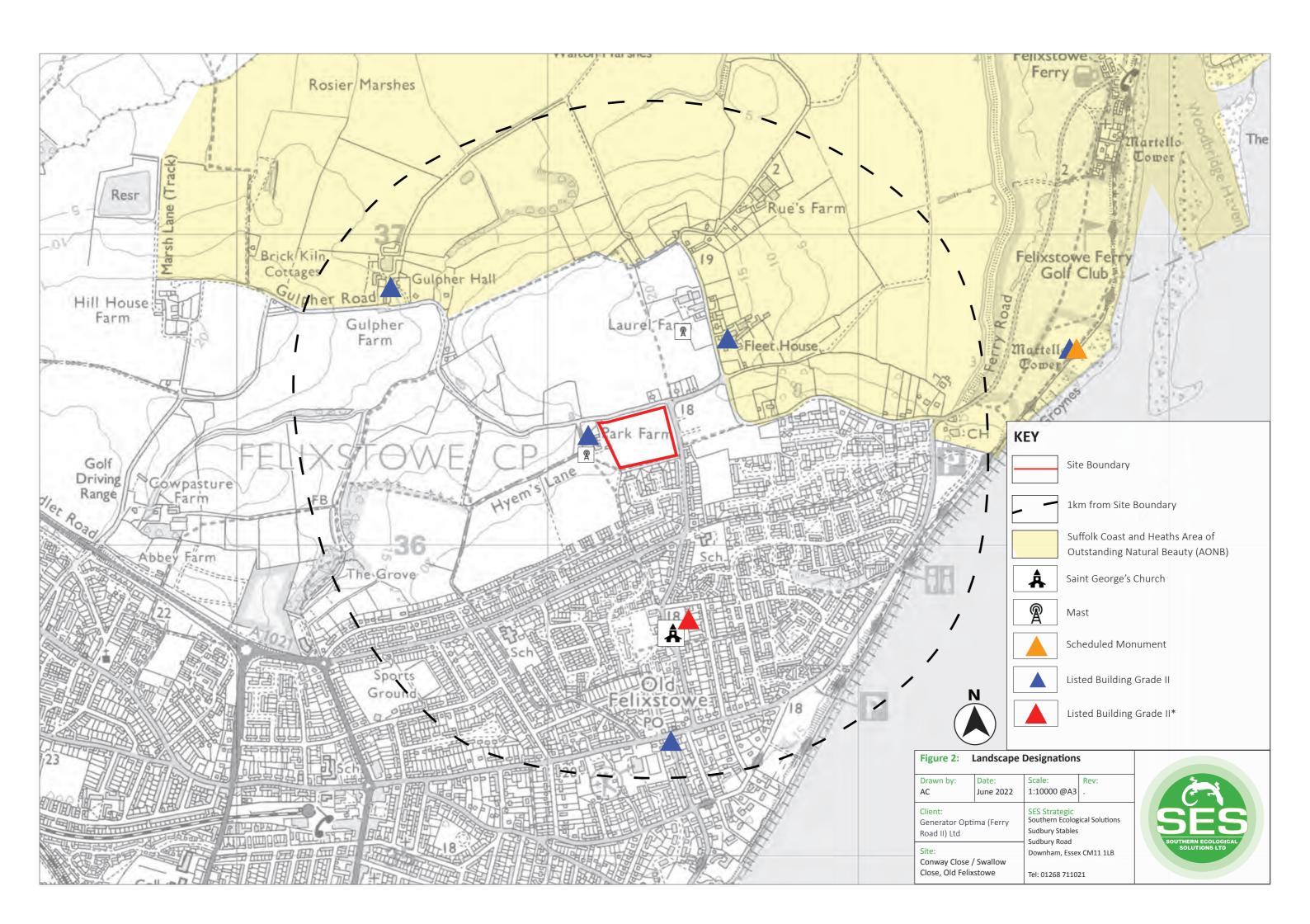
We are East Suffolk



Appendix 7.6

Figures







KEY



Site Boundary



Primary views into Site



Secondary views into Site



Footpath



Bridleway



Informal path

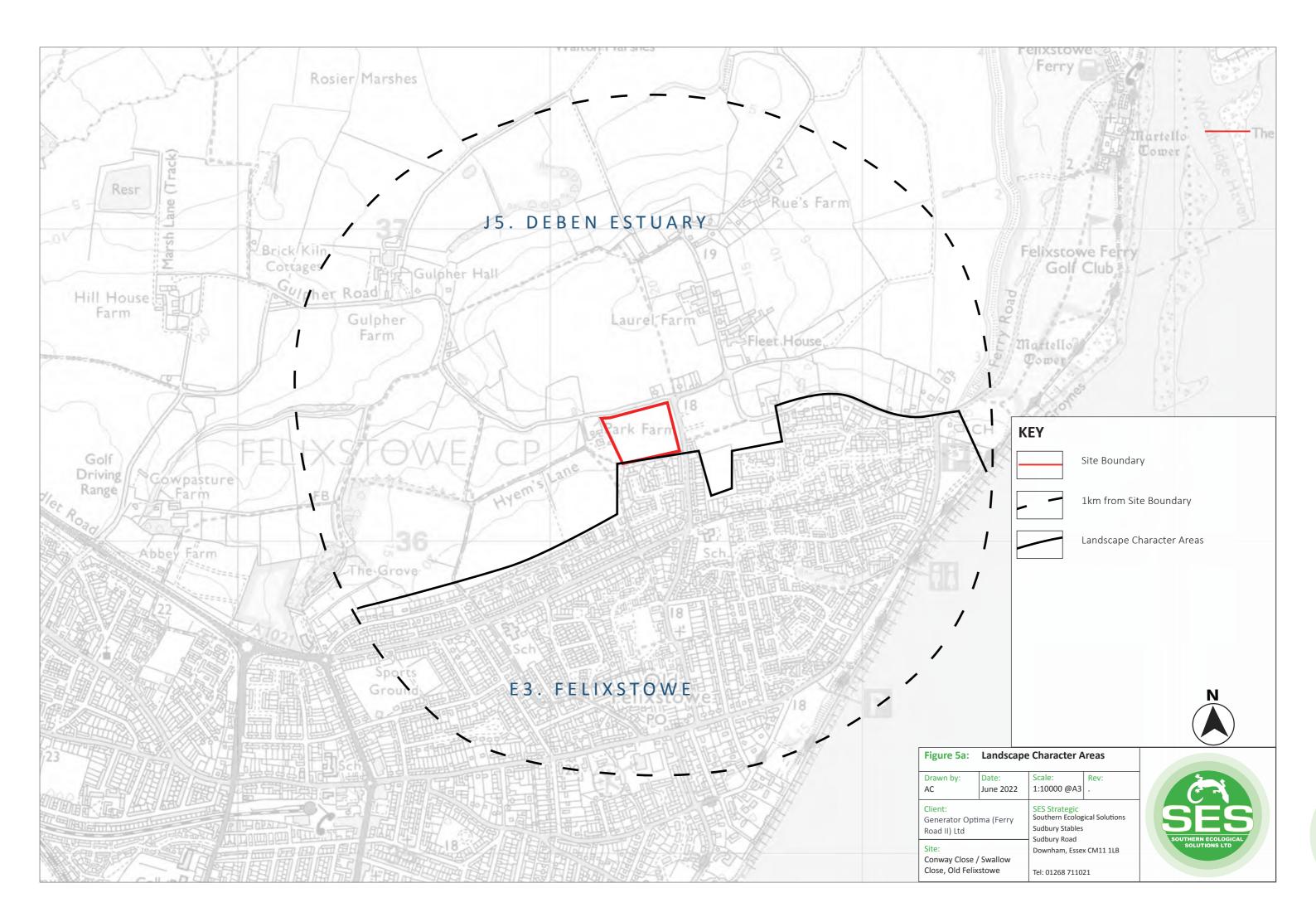


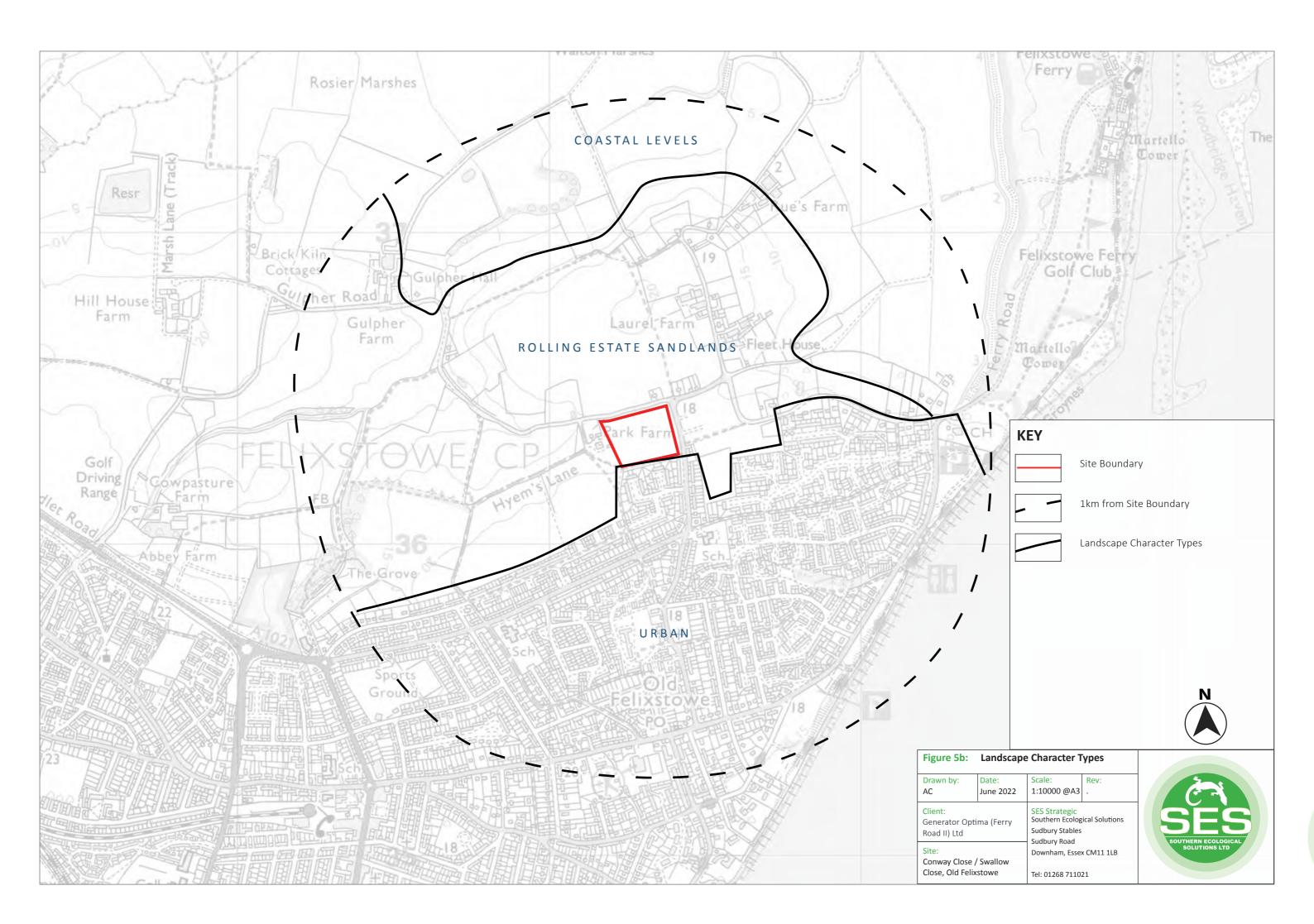


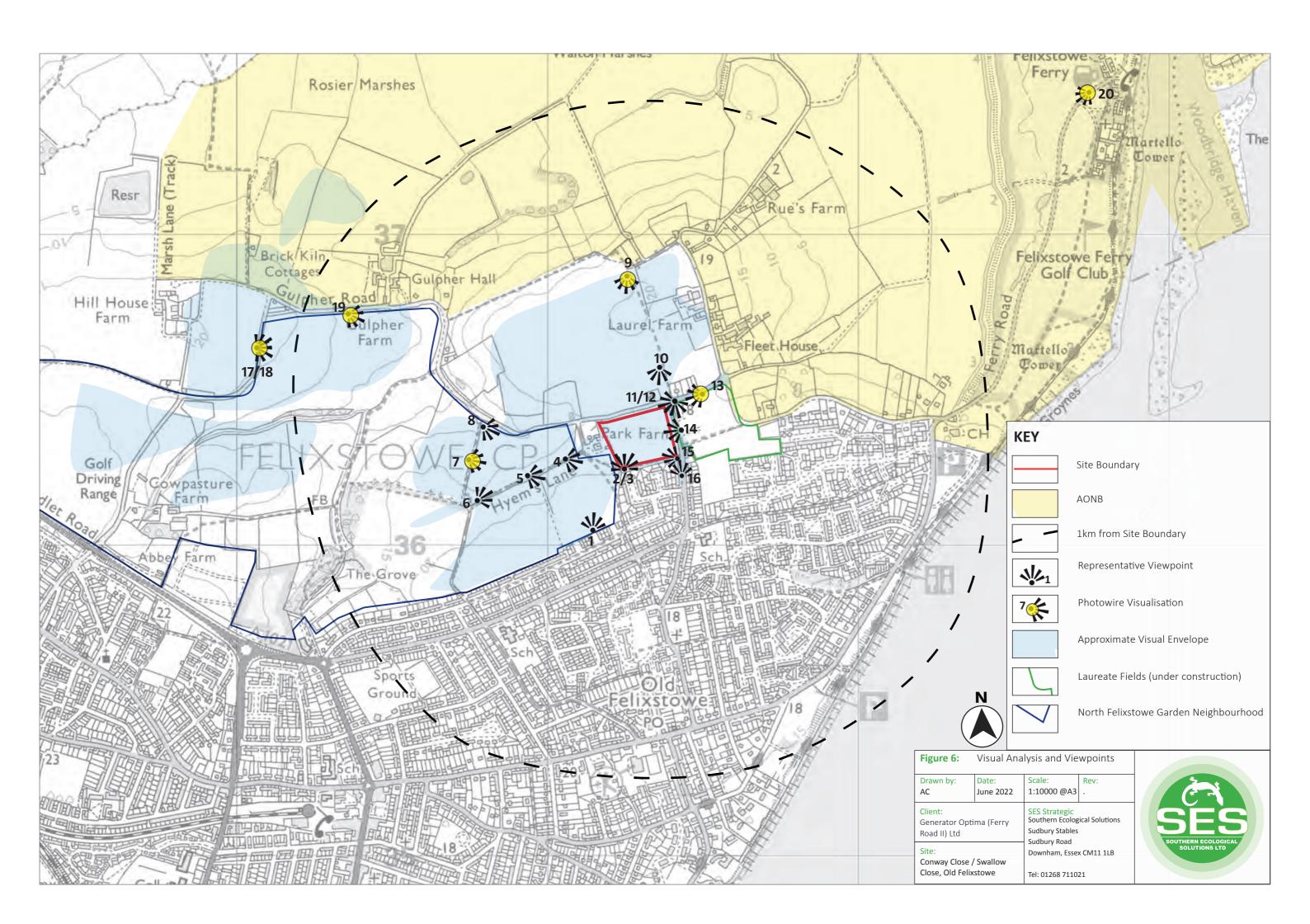
Figure 3:	Site Analysis		
Drawn by: LF	Date: Feb 2021	Scale: NTS @ A3	Rev:
Client: Generator Optima (Ferry Road II) Ltd		SES Strategic Southern Ecological Solutions Sudbury Stables Sudbury Road	
Site: Conway Close / Swallow Close, Old Felixstowe		Downham, Essex CM11 1LB Tel: 01268 711021	

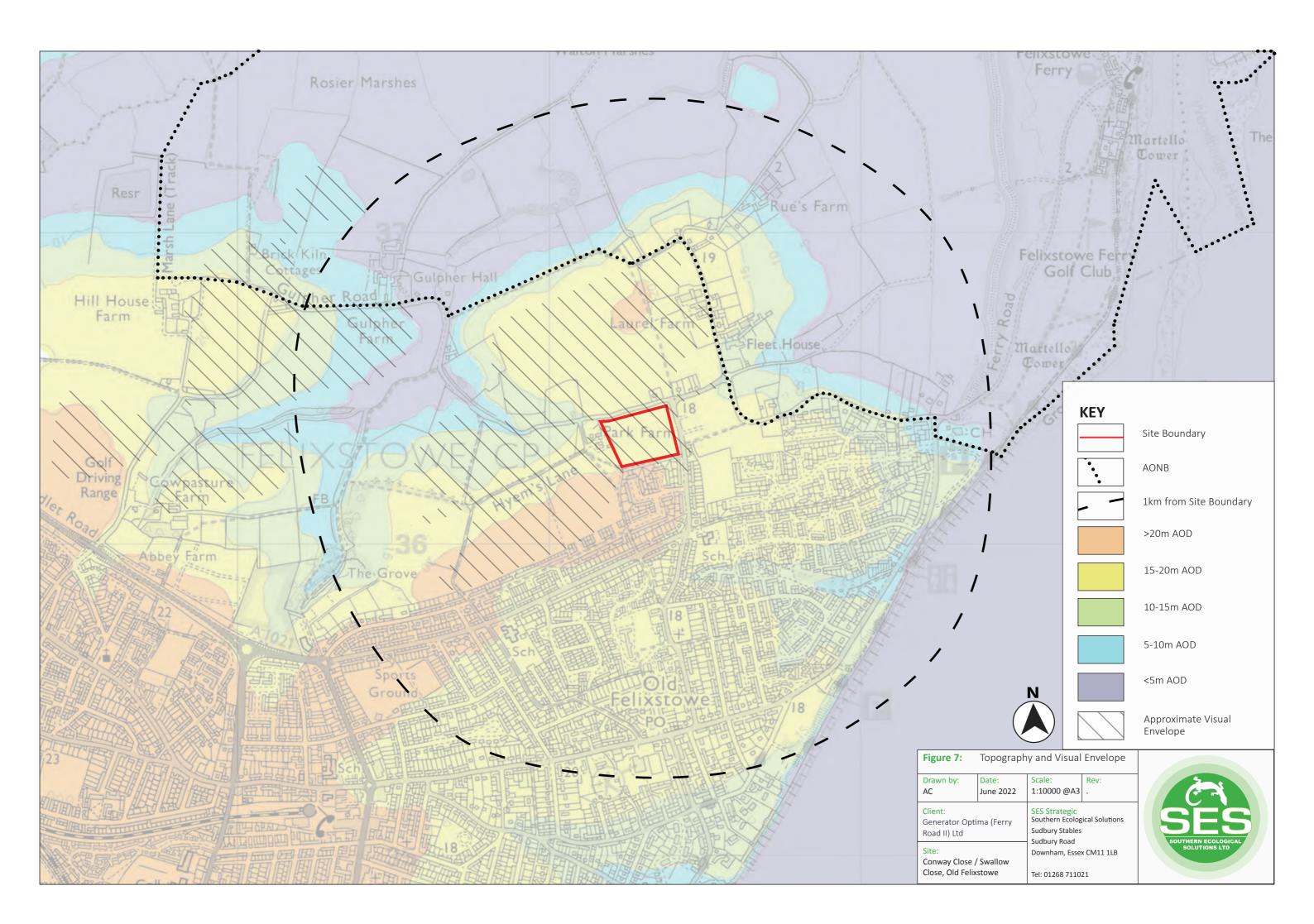












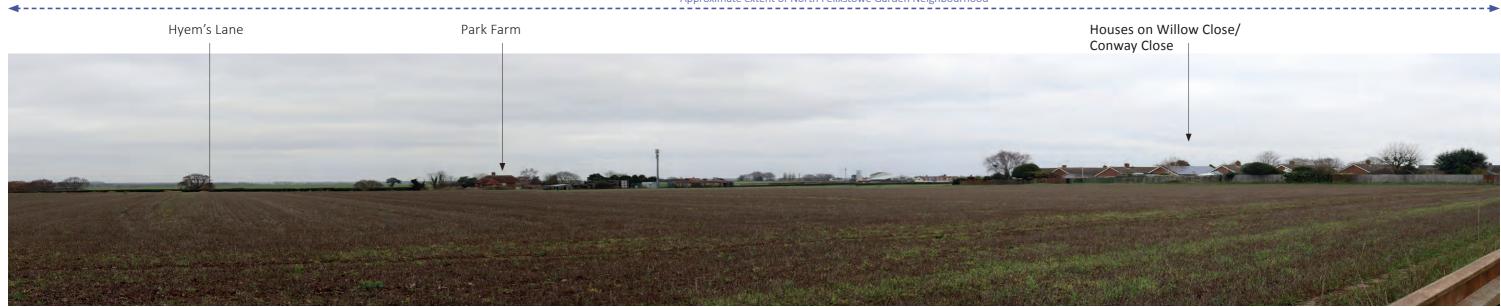


Figure 8.01 (Winter) - View looking north from informal footpath off Upperfield Drive between houses to adjacent field

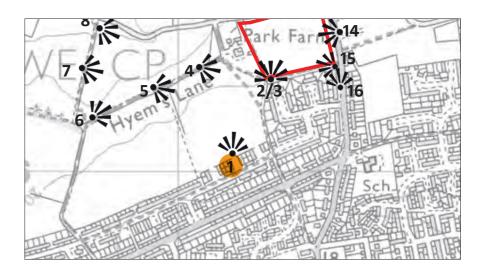




Figure 8.02 (Winter) - View looking north from Footpath 12 between Park Farm and properties adjacent to Upperfield Drive

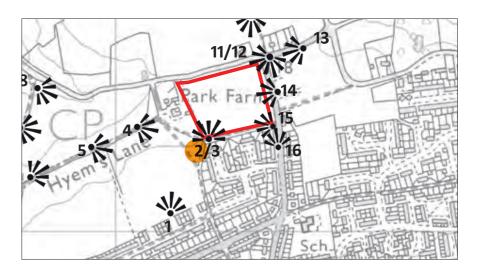
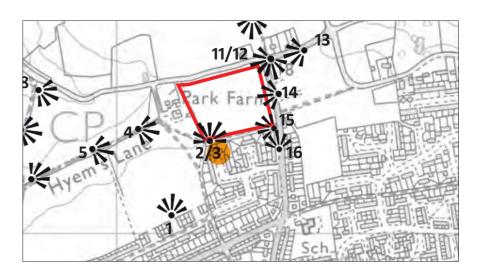




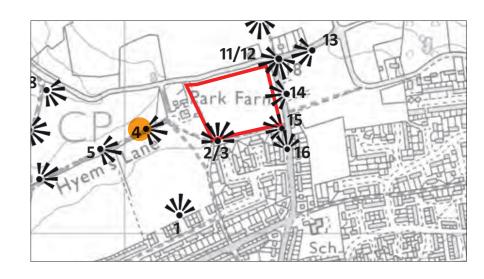
Figure 8.03 (Winter) - View looking north east across the Site from Footpath 12 towards the junction at Ferry Road/Gulpher Road



Approximate extent of North Felixstowe Garden Neighbourhood

Park Farm Mast Properties off Upperfield Drive

Figure 8.04 (Winter) - View looking south east towards the Site from Bridleway 16 where it joins Hyem's Lane



Approximate extent of Laureate Fields

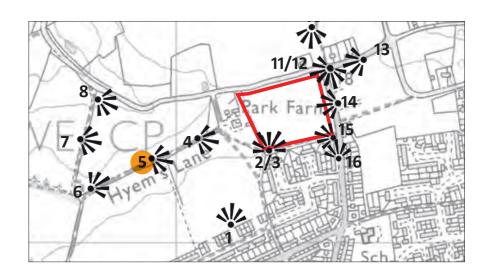
Approximate extent of Site

Approximate extent of North Felixstowe Garden Neighbourhood

Park Farm Hyem's Lane



Figure 8.05 (Winter) - View looking east towards the Site from Hyem's Lane (Bridleway 16)



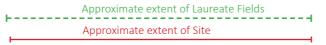




Figure 8.06 (Winter) - View looking east from further along Hyem's Lane on the junction of PROW 15, 16, 17 and 18

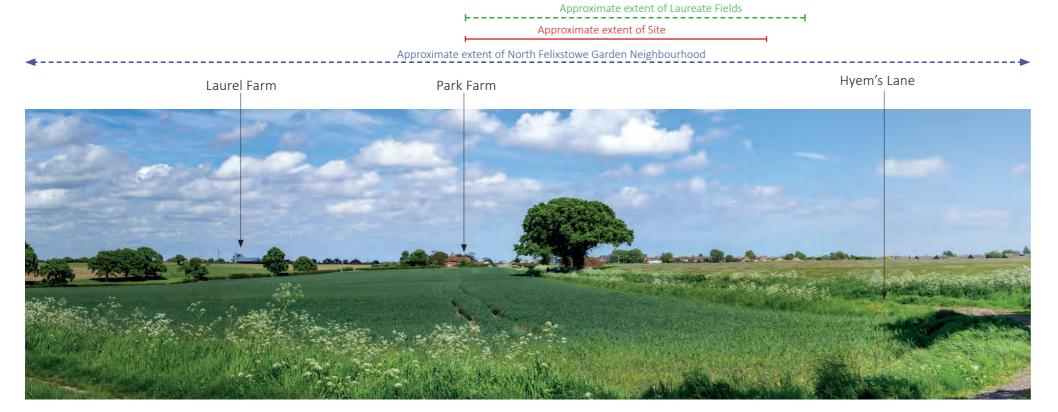
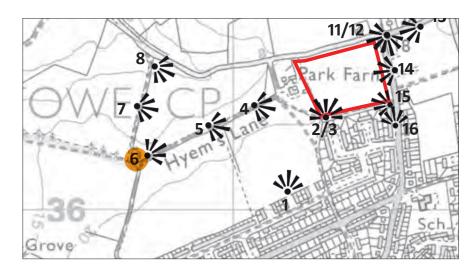
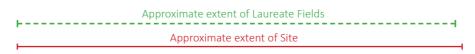


Figure 8.06 (Summer) - View looking east from further along Hyem's Lane on the junction of PROW 15, 16, 17 and 18





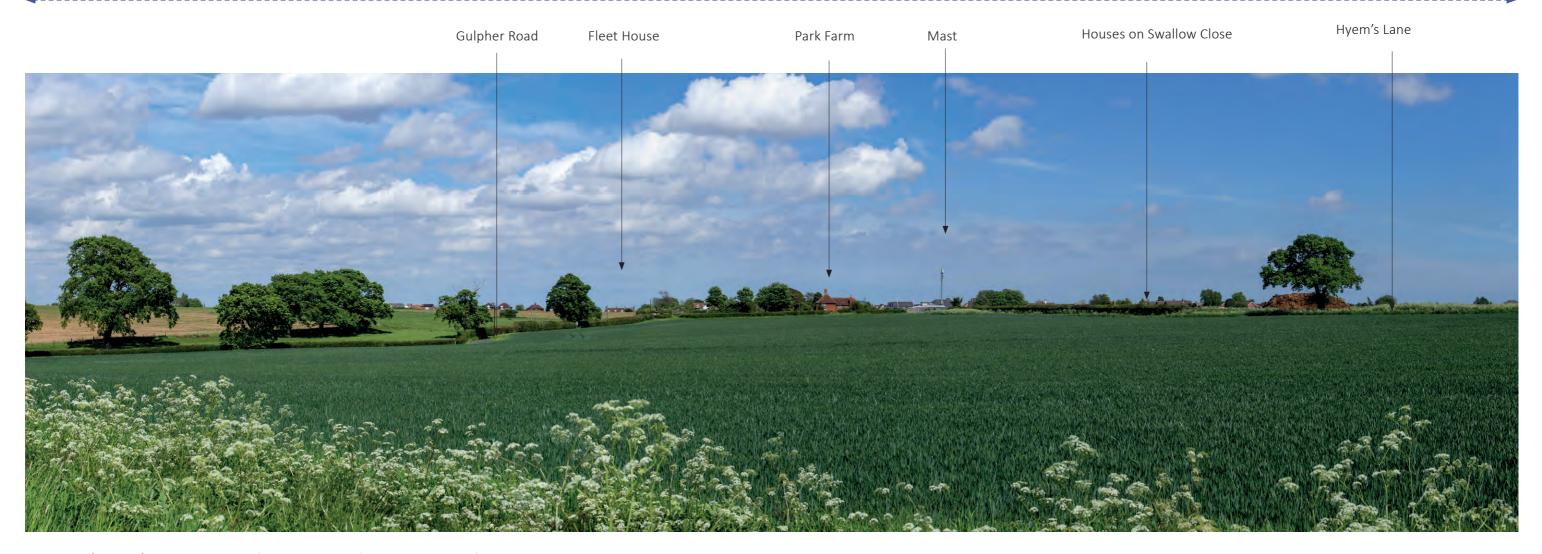


Figure 8.07 (Summer) - View looking east from PROW 17 half way between Hyem's Lane and Gulpher Road

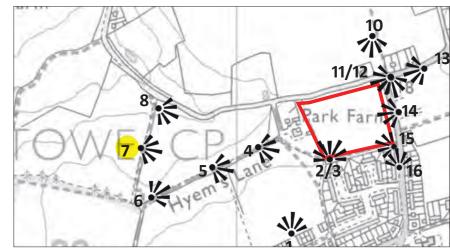




Figure 8.07 (Photomontage)

Approximate extent of Laureate Fields

Approximate extent of North Felixstowe Garden Neighbourhood

Gulpher Road Park Farm Houses on Upperfield Drive just visible

Figure 8.08 (Winter) - View looking south east towards the Site from Footpath 17

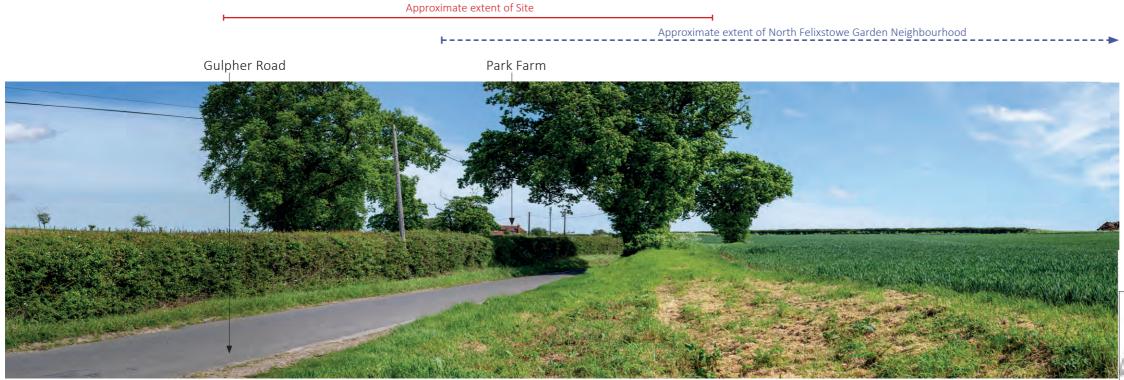


Figure 8.08 (Summer) - View looking south east towards the Site from Footpath 17

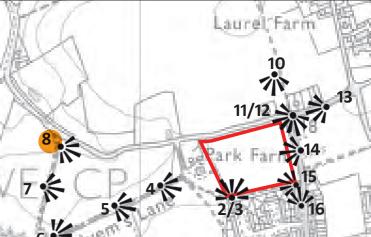


Figure 8.09 (Winter) - View looking south towards the Site from the PRoW 5 adjacent to Hill Cottage



Figure 8.09 (Summer) - View looking south towards the Site from the PRoW 5 adjacent to Hill Cottage

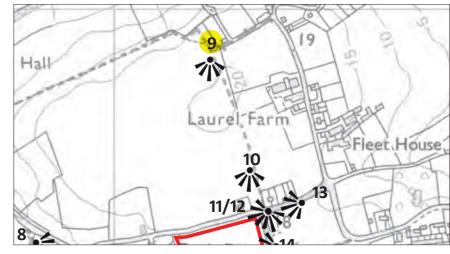




Figure 8.09 (Photomontage)



Figure 8.10 (Winter) - View looking south from the PRoW 5 from Laurel Farm Approximate extent of North Felixstowe Garden Neighbourhood Approximate extent of Laureate Fields Approximate extent of Site



Figure 8.10 (Winter) - View looking south from the PRoW 5 from Laurel Farm

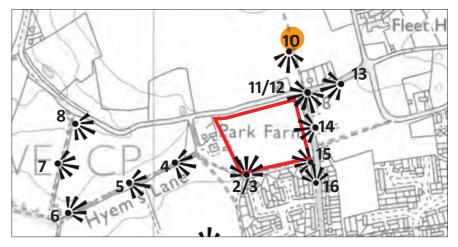
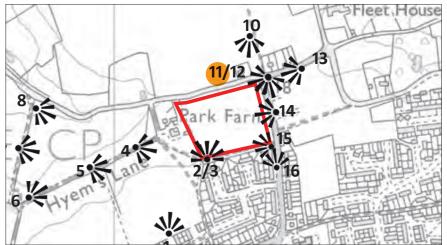




Figure 8.11 (Winter) - View south down Ferry Road showing the Site on the right beyond existing vegetation



Figure 8.11 (Summer) - View south-west taking in the Laureate Fields development (under construction) and Ferry Road



Existing good hedge to northern/northeastern boundaries

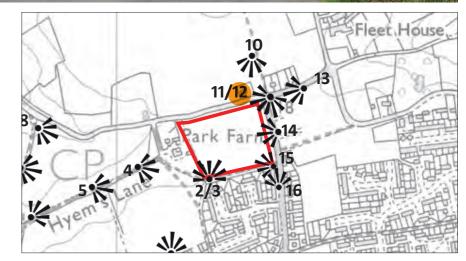


Figure 8.12 (Winter) southwest from the junction with Ferry Road/Gulpher Road

Approximate extent of North Felixstowe Garden Neighbourhood Approximate extent of Laureate Fields Approximate extent of Site

Existing good hedge to northern/northeastern boundaries **FERRY ROAD** GULPHER ROAD

Figure 8.12 (Summer) southwest from the junction with Ferry Road/Gulpher Road



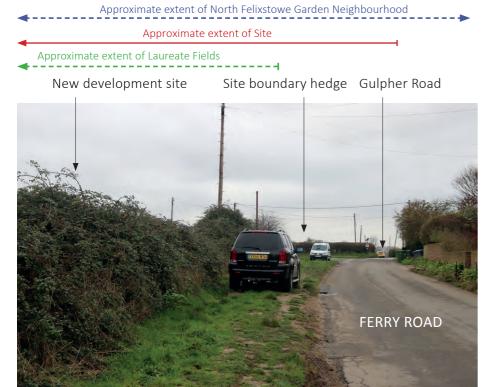


Figure 8.13 (Winter) - View looking west along Ferry Road (at the junction with Marsh End) towards the junction where it turns to Gulpher Road



Figure 8.13 (Summer) - View looking west along Ferry Road (at the junction with Marsh End) towards the junction where it turns to Gulpher Road

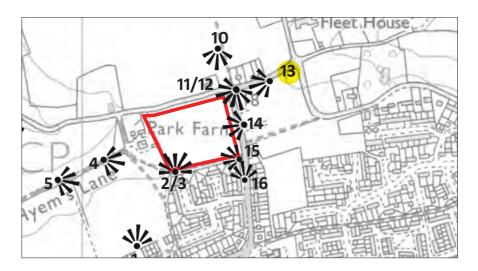




Figure 8.13 (Photomontage)

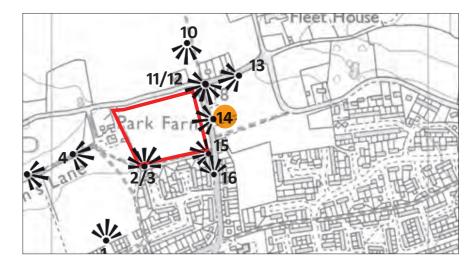
Approximate extent of Laureate Fields

Swallow Close PROV Dock cranes Mast at Park Farm

FERRY ROAD

RANSOM ROAD

Figure 8.14 (Summer) - View west into the Site from Ransom Road, entrance to Laureate Fields



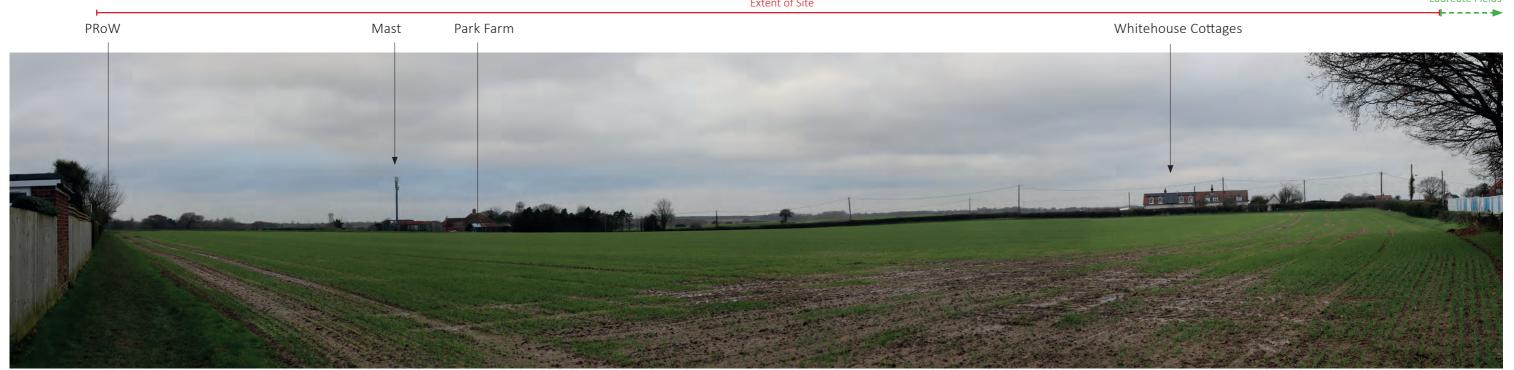
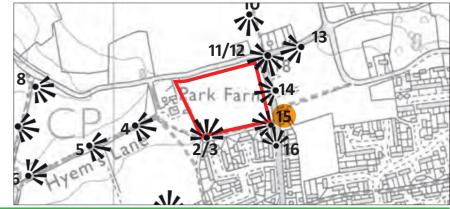


Figure 8.15 (Winter) - View looking west across the Site from Footpath 12 to Park Farm and beyond



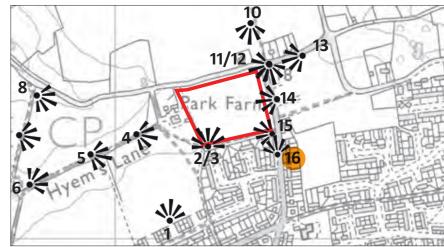
Figure 8.15 (Summer) - View looking west across the Site from Footpath 12 to Park Farm and beyond



Extent of Site Approximate extent of Laureate Fields



Figure 8.16 (Summer) - View north from Ferry Road



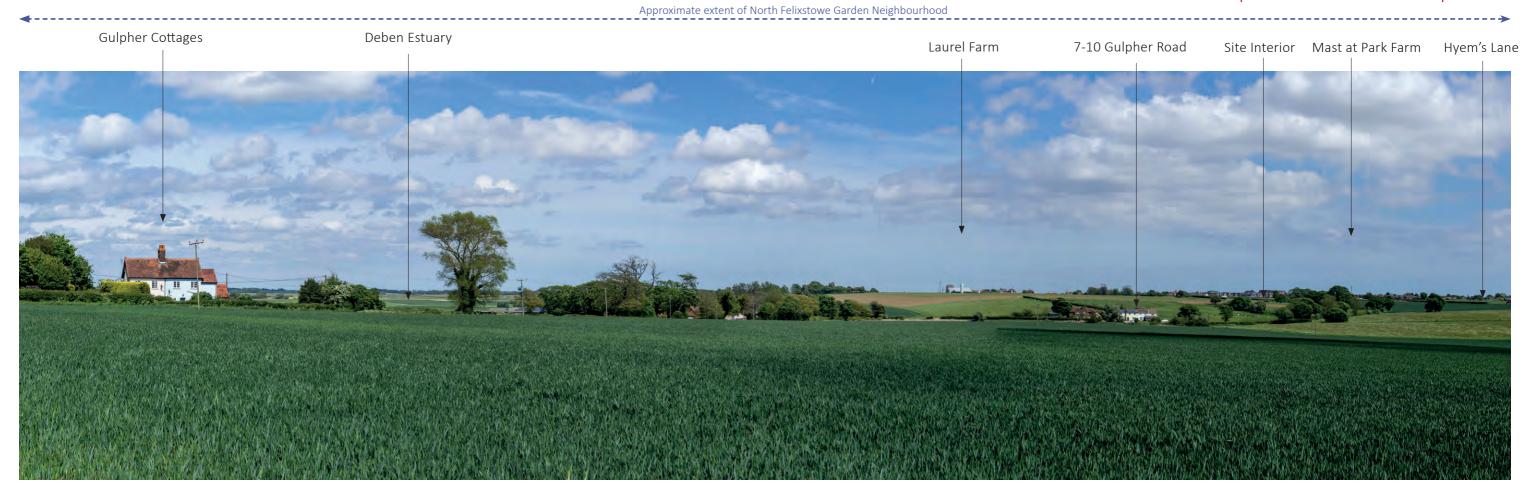


Figure 8.17 (Summer) - View east from Gulpher Road near The Grove

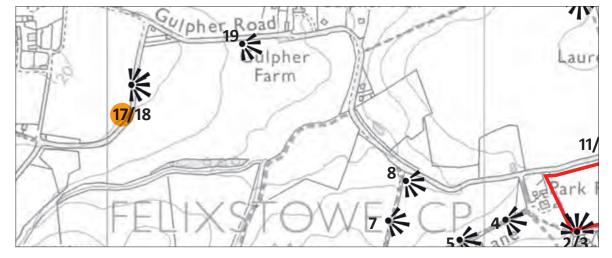
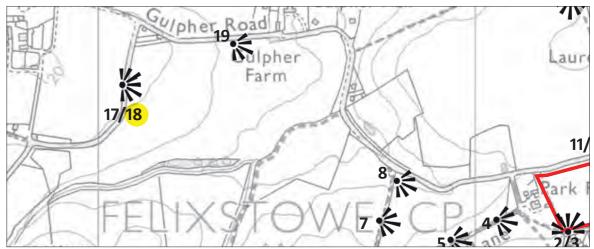




Figure 8.17 (Photomontage)



Figure 8.18 (Summer) - View south from Gulpher Road near The Grove



Approximate extent of Laureate Fields

Approximate extent of Site

Approximate extent of North Felixstowe Garden Neighbourhood

Gulpher Farm Hyem's Lane The Grove

Figure 8.19 (Summer) - View south-east from Gulpher Road near Gulpher Farm

GULPHER ROAD





Figure 8.19 (Photomontage)

Approximate extent of North Felixstowe Garden Neighbourhood

Approximate extent of Site

Approximate extent of Laureate Fields

Felixsowe Ferry Golf Course

Laurcate Fields development

Laurch Farm

Rus's Farm

FERRY ROAD

Figure 8.20 (Summer) - View southwest from Ferry Road at Felixstowe Ferry Golf Course

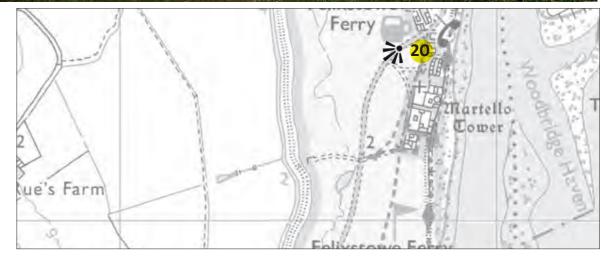




Figure 8.20 (Photomontage)



Chapter 8 - Biodiversity and Ecology

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



Legislative protections



Appendix A - Legislative Protections

Reptiles

The four common British reptiles, common lizard (*Zootoca vivipara*), slow-worm (*Anguis fragilis*), grass snake (*Natrix helvetica*) and adder (*Vipera berus*) are protected under the Wildlife and Countryside Act 1981 (as amended). They are protected against intentionally or recklessly killing and injuring (but not taking), and against sale.

Birds

The nests and eggs of all wild birds are protected under the Wildlife and Countryside Act 1981, making it an offence to take, damage or destroy a nest of any wild bird while it is being built and to take or destroy the egg of any wild bird. The nesting season for birds is generally considered to be March to August inclusive.

Birds which are listed under Schedule 1 of the Wildlife and Countryside Act are afforded additional protection. As such, it is an offence to intentionally or recklessly disturb bird species listed on Schedule 1 and their young at, on or near an 'active' nest.

A number of bird species are also listed under Section 41 (England) (49 species) of the NERC Act. Under the Act, Local Authorities have a duty to have regard to conserving biodiversity as part of policy or decision making. Conserving biodiversity can include restoring or enhancing a population or habitat.

Bats

All bat species belonging to the Vespertilionidae and Rhinolophidae families are European protected species, and are afforded protection in the UK under the Conservation of Habitats and Species Regulations 2017 (as amended). In addition, these species are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). Taken together, these pieces of legislation make it an offence to:

- intentionally, deliberately or recklessly capture, take, kill or injure bats;
- possess, control or transport bats;
- damage or destroy a resting place or breeding place for bats;
- deliberately disturb bats, in particular any disturbance which is likely to:
 - impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or
 - o impair their ability to hibernate (or migrate in the case of migratory species); or
 - o affect significantly the local distribution or abundance of any bat species.
- intentionally or recklessly obstruct access to any structure or place used for shelter or protection by a bat; or
- intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for that purpose.

Badger

The Protection of Badgers Act 1992 exists for welfare reasons, to protect badgers (*Meles meles*) from cruelty. Under the act it a criminal offense to wilfully kill, injure, take, possess or



cruelly ill-treat a badger, or to attempt to do so or to intentionally or recklessly interfere with a sett.

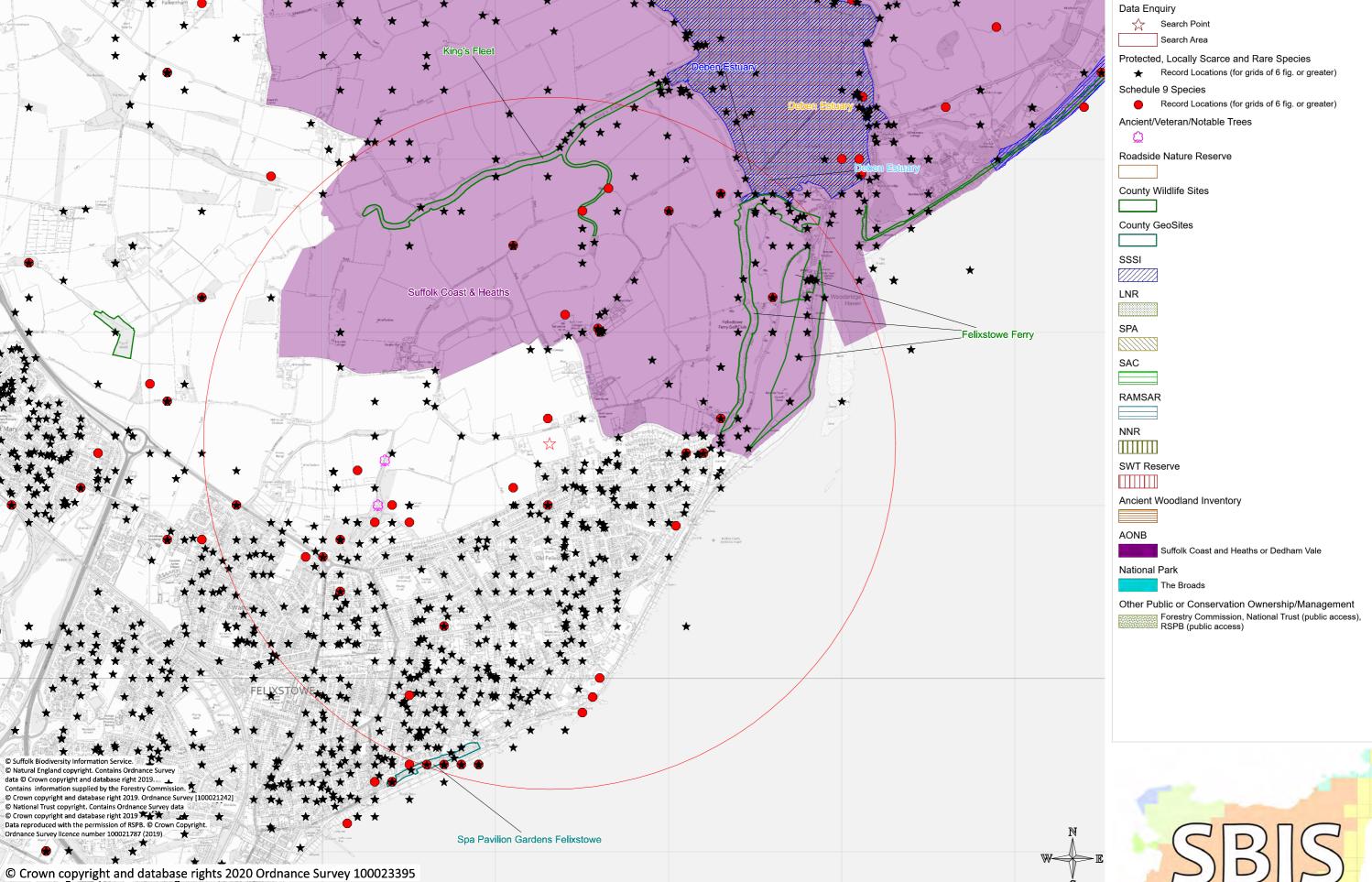
Other Priority Mammals

European hedgehog (*Erinaceus europaeus*) and brown hare (*Lepus europaeus*) are listed in the NERC Act (2006) under Section 41 (England) but afforded no other legal protection.

Under the Act, public bodies have a duty to have regard to conserving biodiversity as part of policy or decision making. Conserving biodiversity can include restoring or enhancing a population or habitat.



County Wildlife Site location plan



MLM Group (Ferry Road, Felixstowe TM3131036356) 2km Data Enquiry



Suffolk Biodiversity Information Service

Date: 27/11/2020 | Drawn by: Andy Mercer

Scale report: 1:20,000



Desk study biological records



Table 9-1: Desk study results.

O	Ociondific Name	Rel	Relevant Legislation / Conservation Status				
Common Name	Scientific Name	WCA 1981	CHSR ¹⁸ 2017	NERC '06	Other		
	Inverteb	rates	·				
Stag Beetle	Lucanus cervus	Sch. 5 ¹⁹		S. 41	Annex II ²⁰		
Black Oil-beetle	Meloe proscarabaeus			S. 41			
Wall	Lasiommata megera			S. 41			
Small Heath	Coenonympha pamphilus			S. 41			
Grayling	Hipparchia semele			S. 41			
Norfolk Hawker	Anaciaeschna isoceles	Sch. 5		S. 41			
Sea Aster Bee	Colletes halophilus			S. 41			
Moss Carder-bee	Bombus muscorum			S. 41			
Large Garden (Ruderal) Bumblebee	Bombus ruderatus			S. 41			
Oak Hook-tip	Watsonalla binaria			S. 41			
Mullein Wave	Scopula marginepunctata			S. 41			
Blood-vein	Timandra comae			S. 41			
Shaded Broad-bar	Scotopteryx chenopodiata			S. 41			
Latticed Heath	Chiasmia clathrata			S. 41			

Conservation of Habitats and Species Regulations 2017 (as amended).
 Protected from sale only.
 Annex II of the Habitats Directive.



Common Name	Colombific Name	Rel	Relevant Legislation / Conservation Status			
	Scientific Name	WCA 1981	CHSR ¹⁸ 2017	NERC '06	Other	
Dusky Thorn	Ennomos fuscantaria			S. 41		
Small Emerald	Hemistola chrysoprasaria			S. 41		
Buff Ermine	Spilosoma lutea			S. 41		
White Ermine	Spilosoma lubricipeda			S. 41		
Cinnabar	Tyria jacobaeae			S. 41		
Grey Dagger	Acronicta psi			S. 41		
Knot Grass	Acronicta rumicis			S. 41		
Mouse Moth	Amphipyra tragopoginis			S. 41		
Green-brindled Crescent	Allophyes oxyacanthae			S. 41		
Mottled Rustic	Caradrina morpheus			S. 41		
Rustic	Hoplodrina blanda			S. 41		
Rosy Rustic	Hydraecia micacea			S. 41		
Ear Moth	Amphipoea oculea			S. 41		
Large Wainscot	Rhizedra lutosa			S. 41		
Rosy Minor	Litoligia literosa			S. 41		
Centre-barred Sallow	Atethmia centrago			S. 41		
Powdered Quaker	Orthosia gracilis			S. 41		
Hedge Rustic	Tholera cespitis			S. 41		
Dot Moth	Melanchra persicariae			S. 41		



Common Name	Oniontifia Nama	Rel	Relevant Legislation / Conservation Status			
	Scientific Name	WCA 1981	CHSR ¹⁸ 2017	NERC '06	Other	
Shoulder-striped Wainscot	Leucania comma			S. 41		
Small Square-spot	Diarsia rubi			S. 41		
	Amph	ibians				
Smooth Newt	Lissotriton vulgaris	Sch. 5 ²¹				
Common Toad	Bufo bufo	Sch. 5 ²¹		S. 41		
Common Frog	Rana temporaria	Sch. 5 ²¹				
	Rep	tiles				
Common Lizard	Zootoca vivipara	Sch. 5		S. 41		
Slow-worm	Anguis fragilis	Sch. 5		S. 41		
	Bir	rds				
Spoonbill	Platalea leucorodia	Sch. 1				
Bewick's Swan	Cygnus columbianus	Sch. 1				
Whooper Swan	Cygnus cygnus	Sch. 1				
Wood Sandpiper	Tringa glareola	Sch. 1				
Little Tern	Sternula albifrons	Sch. 1				
Avocet	Recurvirostra avosetta	Sch. 1				
Mediterranean Gull	Ichthyaetus melanocephalus	Sch. 1				
Eurasian Bittern	Botaurus stellaris	Sch. 1		S. 41		
Black-throated Loon	Gavia arctica	Sch. 1				



Common Name	Soiontifio Nomo	Rel	Relevant Legislation / Conservation Status			
	Scientific Name	WCA 1981	CHSR ¹⁸ 2017	NERC '06	Other	
Common Loon	Gavia immer	Sch. 1				
Kingfisher	Alcedo atthis	Sch. 1				
European Honey Buzzard	Pernis apivorus	Sch. 1				
Western Marsh Harrier	Circus aeruginosus	Sch. 1				
Western Osprey	Pandion haliaetus	Sch. 1				
Montagu's Harrier	Circus pygargus	Sch. 1				
Dartford Warbler	Curruca undata	Sch. 1				
Garganey	Spatula querquedula	Sch. 1				
Garganey	Spatula querquedula	Sch. 1				
Pintail	Anas acuta	Sch. 1				
Greylag Goose	Anser anser	Sch. 1				
Dark-bellied Brent Goose	Branta bernicla			S. 41		
Greenshank	Tringa nebularia	Sch. 1				
Goldeneye	Bucephala clangula	Sch. 1				
Green Sandpiper	Tringa ochropus	Sch. 1				
Common Reed Bunting	Emberiza schoeniclus			S. 41		
Snow Bunting	Plectrophenax nivalis	Sch. 1				
Lapland Bunting	Calcarius Iapponicus	Sch. 1				
Shore Lark	Eremophila alpestris	Sch. 1				



Common Name	Scientific Name	Relevant Legislation / Conservation Status			
		WCA 1981	CHSR ¹⁸ 2017	NERC '06	Other
Merlin	Falco columbarius	Sch. 1			
Red-backed Shrike	Lanius collurio	Sch. 1			
Peregrine	Falco peregrinus	Sch. 1			
Snowy Owl	Bubo scandiacus	Sch. 1			
Red-throated Loon	Gavia stellata	Sch. 1			
Purple Heron	Ardea purpurea	Sch. 1			
Little Gull	Hydrocoloeus minutus	Sch. 1			
White-tailed Eagle	Haliaeetus albicilla	Sch. 1			
Hen Harrier	Circus cyaneus	Sch. 1		S. 41	
Dotterel	Charadrius morinellus	Sch. 1			
Red Kite	Milvus	Sch. 1			
Woodlark	Lullula arborea	Sch. 1		S. 41	
Grey Partridge	Perdix perdix			S. 41	
Turtle Dove	Streptopelia turtur			S. 41	
Velvet Scoter	Melanitta fusca	Sch. 1			
Curlew	Numenius arquata			S. 41	
Black-tailed Godwit	Limosa limosa	Sch. 1			
Long-tailed Duck	Clangula hyemalis	Sch. 1			
European Greater White-fronted Goose	Anser albifrons			S. 41	



Common Name	Opiondific Name	Rel	Relevant Legislation / Conservation Status			
	Scientific Name	WCA 1981	CHSR ¹⁸ 2017	NERC '06	Other	
Lapwing	Vanellus vanellus			S. 41		
Common Scoter	Melanitta nigra	Sch. 1		S. 41		
Eurasian Whimbrel	Numenius phaeopus	Sch. 1				
Eurasian Skylark	Alauda arvensis			S. 41		
Redwing	Turdus iliacus	Sch. 1				
Fieldfare	Turdus pilaris	Sch. 1				
Spotted Flycatcher	Muscicapa striata			S. 41		
Ring Ouzel	Turdus torquatus			S. 41		
Tree Pipit	Anthus trivialis			S. 41		
Yellow Wagtail	Motacilla flava flavissima			S. 41		
Hawfinch	Coccothraustes			S. 41		
Yellowhammer	Emberiza citrinella			S. 41		
Black Redstart	Phoenicurus ochruros	Sch. 1				
Hobby	Falco subbuteo	Sch. 1				
Western Barn Owl	Tyto alba	Sch. 1				
Temminck's Stint	Calidris temminckii	Sch. 1				
Bee-eater	Merops apiaster	Sch. 1				
Wryneck	Jynx torquilla	Sch. 1				
Bearded Reedling	Panurus biarmicus	Sch. 1				



Common Name	Opiondific Name	Rel	Relevant Legislation / Conservation Status			
	Scientific Name	WCA 1981	CHSR ¹⁸ 2017	NERC '06	Other	
Common Firecrest	Regulus ignicapilla	Sch. 1				
Serin	Serinus serinus	Sch. 1				
Red Crossbill	Loxia curvirostra	Sch. 1				
Eurasian Hoopoe	Upupa epops	Sch. 1				
Cuckoo	Cuculus canorus			S. 41		
Grasshopper Warbler	Locustella naevia			S. 41		
House Sparrow	Passer domesticus			S. 41		
Tree Sparrow	Passer montanus			S. 41		
Lesser Redpoll	Acanthis cabaret			S. 41		
Marsh Warbler	Acrocephalus palustris	Sch. 1		S. 41		
Brambling	Fringilla montifringilla	Sch. 1				
Cetti's Warbler	Cettia cetti	Sch. 1				
	M	ammals	•			
West European Hedgehog	Erinaceus europaeus			S. 41		
Serotine	Eptesicus serotinus	Sch. 5	Sch. 2			
Noctule Bat	Nyctalus noctula	Sch. 5	Sch. 2	S. 41		
Nathusius's Pipistrelle	Pipistrellus nathusii	Sch. 5	Sch. 2			
Pipistrelle	Pipistrellus pipistrellus	Sch. 5	Sch. 2			
Soprano Pipistrelle	Pipistrellus pygmaeus	Sch. 5	Sch. 2	S. 41		



Common Name	Scientific Name	Relevant Legislation / Conservation Status			
		WCA 1981	CHSR ¹⁸ 2017	NERC '06	Other
European Otter	Lutra lutra	Sch. 5	Sch. 2	S. 41	
Eurasian Badger	Meles meles				PBA '92 ²¹
European Water Vole	Arvicola amphibius	Sch. 5		S. 41	
Harvest Mouse	Micromys minutus			S. 41	
Brown Hare	Lepus europaeus			S. 41	

²¹ Protection of Badgers Act 1992.



Site photographs





Photo 1: g4 - Modified grassland along the site south boundary (Public Right of Way).





Photo 2: w1g6 - Line of Trees along the south-east site boundary, c1c - Cereal crop.





Photo 3: h2a - Hedgerow (priority habitat) along Ferry Road.



Habitat Condition Assessment sheets

Condition Sheet: GRASSLAND Habitat Type (low distinctiveness)					
UKHab Habitat Type(s)	UKHab Habitat Type(s)				
Grassland - Modified grassland	d				
Site name/location	Ferry Road, Felixstowe	Onsite/offsite	Onsite		
Central grid reference of	TM 31309 36349	Unique	N/A		
habitat		polygon			
		reference			
Limitations (if applicable)	N/A	Metric 3.0	N/A		
		survey			
		reference (if			
		condition			
		assessment of			
		this polygon			
		relates to a			
		wider habitat			
		survey)			
Habitat Description					

Grassland margins along boundaries of the arable field on site.

See UKHab

Condition Assessment Criteria	1	Condition Achieved (Y/N)	Notes/Justification
1	There must be 6-8 species per m2. If a grassland has 9 or more species per m2 it should be classified as a medium distinctiveness grassland habitat type. NB - this criterion is essential for achieving moderate condition.	N	Grassland was species-poor and did not meet this criterion.

2	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Y	The grassland margin was regularly mown along the southern boundary, and left unmanaged along the western boundary, creating a varied sward height.
3	Some scattered scrub (including bramble) may be present, but scrub accounts for less than 20% of total grassland area. Note - patches of shrubs with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	N	The hedgerow encroaches on the grassland margin and therefore the grassland does not meet this criterion.
4	Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	N	The proximity of the grassland margin to arable fields ploughed with machinery means this grassland does not meet this criterion.
5	Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	N	Areas of bare ground within the grassland field margins means this grassland does not meet this criterion.
6	Cover of bracken less than 20%.	Y	No bracken was found within the modified grassland so this criterion is met.
7	There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981).	Y	No non-native invasive species were found within the modified grassland so this criterion is met.
	Essential criterion 1	l achieved (Y/N)	
	Number o	f criteria passed	3

Condition Assessment Result	Condition Assessment Score	Score Achieved ×/✓
Passes 6 or 7 of 7 criteria including passing essential criterion 1	Good (3)	X
Passes 4 or 5 of 7 criteria including passing essential criterion 1	Moderate (2)	X
Passes 0, 1, 2 or 3 of 7 criteria; OR 4, 5 or 6 of criteria but failing criterion 1	Poor (1)	✓

Suggested enhancement interventions to improve condition score

The sowing of native wildflower seeds and utilising appropriate grassland management will increase the species-richness of this habitat and improve the condition of this habitat.

Notes	
N/A	

Condition Sheet: LINE OF TREES Habitat Type

UKHab Habitat Type(s)

Line of trees

Site name/location	Ferry Road, Felixstowe	Onsite/offsite	Onsite
Central grid reference of habitat	TM 31309 36349	Unique polygon reference	N/A
Limitations (if applicable)	N/A	Metric 3.0 survey reference (if condition assessment of this polygon relates to a wider habitat survey)	N/A

Habitat Description

A row of mature pedunculate and turkey oak trees and a horse chestnut are 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.

See Chapter 8 of User Guide for definition.

Condition Assessment Criteria		Condition Achieved (Y/N)	Notes/Justification
1	More than 70% of trees are native species.	N	Only the pedunculate oak trees on site are native species.

	Tree canopy is predominantly continuous with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide.	Y	The tree lines provides continuous canopy cover of at least 90%.
3	Includes one or more mature ¹ or veteran ² tree.	Y	The oak trees on site are considered mature trees.
	There is an undisturbed naturally vegetated strip of at least 6 m on both sides to protect the line of trees from farming and other anthropogenic operations.	N	The line of trees are within 6 m of the arable field farming operations.
	At least 95% of the trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.	Y	No signs of damage or diseases were recorded during the site visit.
	Nu	mber of criteria passed	3
Condition Assessment Result	Condition Assessment Score	Score Achieved ×/✓	
Passes 5 of 5 criteria	Good (3)	X	
Passes 3 or 4 of 5 criteria	Moderate (2)	✓	
Passes 0, 1 or 2 of 5 criteria	Poor (1)	X	
Suggested enhancement interve	ntions to improve condition score		

Notes		

Footnote 1 - A mature tree in this context is one that is at least 2/3 expected fully mature height for the species.

Footnote 2 - All ancient trees are veteran trees, but not all veteran trees are ancient. A veteran tree may not be very old, but it has decay features, such as branch death and hollowing. These features contribute to its biodiversity, cultural and heritage value. Veteran trees can be classified if they have four out of the five following features:

- 1. Rot sites associated with wounds which are decaying >400 cm2;
- 2. Holes and water pockets in the trunk and mature crown >5 cm diameter;
- 3. Dead branches or stems >15 cm diameter;
- 4. Any hollowing in the trunk or major limbs;
- 5. Fruit bodies of fungi known to cause wood decay

Condition sheet: HED	GEROW Habitat Types		
UKHab Habitat Type			
Native hedgerow			
Site name/Location	Ferry Road, Felixstowe	Onsite/offsite	Onsite
Habitat's central grid reference	TM 31309 36349	Unique polygon reference(s)	N/A
Limitations (if applicable)	N/A	Metric 3.1 survey reference (if condition assessment of this polygon relates to a wider	N/A

habitat survey)

Habitat Description

Species-poor, native hedgerows are present along the northern boundary and the northern end of the eastern boundary.

See Table TS1-3 of the Technical Supplement.

Condition Assessment Criteria

A series of ten attributes, representing key physical characteristics, are used for this assessment. The attributes, and the minimum criteria for achieving a favourable condition in each, are defined. The attributes use similar favourable condition criteria to the Hedgerow Survey Handbook and the handbook is the recommended source of reference for assessing individual hedgerow attributes.

Hedgerow favourable	condition attributes			
Attributes and functional groupings (A, B, C, D & E)	Criteria (the minimum requirements for 'favourable condition'	Description	Condition Achieved (Y/N)	Notes/Justification
Core groups - applicat	ole to all hedgerow types		(1/11)	

A1.	Height	>1.5 m average along length	The average height of woody growth estimated from base of stem to the top of shoots, excluding any bank beneath the hedgerow, any gaps or isolated trees. Newly laid or coppiced hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice). A newly planted hedgerow does not pass this criterion (unless it is > 1.5 m height).	N	The hedgerow was approximately 1.3 m high.
A2.	Width	>1.5 m average along length	The average width of woody growth estimated at the widest point of the canopy, excluding gaps and isolated trees. Outgrowths (e.g. blackthorn suckers) are only included in the width estimate when they >0.5 m in height. Laid, coppiced, cut and newly planted hedgerows are indicative of good management and pass this criterion for up to a maximum of four years (if undertaken according to good practice ⁴).	N	The hedgerow was approximately 1 m wide.
B1.	Gap - hedge base	Gap between ground and base of canopy <0.5 m for >90% of length (unless 'line of trees')	This is the vertical gappiness of the woody component of the hedgerow, and its distance from the ground to the lowest leafy growth. Certain exceptions to this criterion are acceptable (see page 65 of the Hedgerow Survey Handbook).	Y	No obvious gaps in the hedge base.

B2.	Gap - hedge canopy continuity	Gaps make up <10% of total length and No canopy gaps >5 m	This is the horizontal gappiness of the woody component of the hedgerow. Gaps are complete breaks in the woody canopy (no matter how small). Access points and gates contribute to the overall gappiness, but are not subject to the >5 m criterion (as this is the typical size of a gate).	Y	Continuous canopy along the hedgerow.
C1.	Undisturbed ground and perennial vegetation	>1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length: - measured from outer edge of hedgerow, and - is present on one side of the hedge (at least)	This is the level of disturbance (excluding wildlife disturbance) at the base of the hedge. Undisturbed ground should be present for at least 90% of the hedgerow length, greater than 1m in width and must be present along at least one side of the hedge. This criterion recognises the value of the hedge base as a boundary habitat with the capacity to support a wide range of species. Cultivation, heavily trodden footpaths, poached ground etc. can limit available habitat niches.	Y	Herbaceous vegetation present along the entire length of the hedgerow.
C2.	Undesirable perennial vegetation	Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground	The indicator species used are nettles (Urtica spp.), cleavers (Galium aparine) and docks (Rumex spp.). Their presence, either singly or together, should not exceed the 20% cover threshold.	N	Undesirable perennial species were present within the ground flora of the hedgerow.
D1.	Invasive and neophyte species	>90% of the hedgerow and undisturbed ground is free of invasive non-native and neophyte species	Neophytes are plants that have naturalised in the UK since AD 1500. For information on neophytes see the JNCC website and for information on invasive non-native species see the GB Non-Native Secretariat website.	Y	No invasive species were recorded within the hedgerow.

D2.	Current damage	>90% of the hedgerow or undisturbed ground is free of damage caused by human activities	This criterion addresses damaging activities that may have led to or lead to deterioration in other attributes. This could include evidence of pollution, piles of manure or rubble, or inappropriate management practices (e.g. excessive hedge cutting).	N	Damage to ground by the hedgerow from the adjacent arable field.
Add	itional group - app	olicable to hedgerows wi	th trees only		
E1.	Tree age	At least one mature tree per 30m stretch of hedgerow. A mature tree is one that is at least 2/3 expected fully mature height for the species.	This criterion addresses if there are sufficient mature trees (within the scope of planning timescales) which are of higher value to biodiversity.	N/A	N/A
E2.	Tree health	At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.	This criterion identifies if the trees are subject to damage which compromises the survival and health of the individual specimens.	N/A	N/A

Each attribute is assigned to one of five functional groups (A – E), as indicated in Table TS1-2 and the condition of a hedgerow is assessed according to the number of attributes from these functional groups which pass or fail the 'favourable condition' criteria according to the approach set out in Table TS1-3.

The hedgerow condition assessment generates a weighting (score) ranging from 1-3, which is used within the biodiversity metric 3.1. The scores for each are set out in tables TS1-3 and TS1-4 below.

TABLE TS1-3: Hedgerow condition assessment and weighting

Condition categories	for hedgerows without tr	ees
Category	Maximum number of attributes that can fail to meet 'favourable condition' criteria in Table TS1-2	Weighting (score)
Good	No more than 2 failures in total; AND No more than 1 in any functional group.	3
Moderate	No more than 4 failures in total; AND <u>Does not fail both</u> <u>attributes</u> in more than one functional group (e.g. fails attributes A1, A2, B1 & C2 = Moderate condition).	2

Poor	Fails a total of more than 4 attributes; OR Fails both attributes in more than one functional group (e.g. fails attributes A1, A2, B1 & B2 = Poor condition).	1
Score achieved: 2 = Moderate		
Condition categories	for hedgerows with trees	
Category	Maximum number of attributes that can fail to meet 'favourable condition' criteria in Table TS1-2	Weighting (score)
Good	No more than 2 failures in total; AND No more than 1 failure in any functional group.	3
Moderate	No more than 5 failures in total; AND Does not fail both attributes in more than one functional group (e.g. fails attributes A1,	2

Poor	Fails a total of more than 5 attributes; OR Fails both attributes in more than one functional group (e.g. fails attributes A1, A2, B1 & B2 = Poor condition).		
Score achieved:	N/A		

Suggested enhancement interventions to improve condition score

Hedgerow to be managed to grow over 1.5 m tall and wide, with protection from damage and appropriate management to allow desirable perennial ground flora to establish.



Wintering bird survey results

Site Name: Ferry Road, Felixstowe

Project No: 65206261

Date of Survey: November 2020 - February 2021
Surveyor(s): Alanna Cooper and Sophie Barrell



BTO code	Common name	Scientific name	восс	Schedule 1	NERC Act 2006	Visit 1	Visit 2	Visit 3	Visit 4
В.	Blackbird	Turdus merula	Green				1		
вн	Black-headed Gull	Chroicocephalus ridibundus	Amber			5	2	2	
ВТ	Blue Tit	Cyanistes caeruleus	Green			2			
C.	Carrion Crow	Corvus corone	Green				2	1	7
СН	Chaffinch	Fringilla coelebs	Green			1			
СМ	Common Gull	Larus canus	Amber				1		
FP	Feral pigeon	Columba livia domestica				12			
GO	Goldfinch	Carduelis carduelis	Green			1			3
GT	Great Tit	Parus major	Green			4			3
HG	Herring Gull	Larus argentatus	Red		Yes		1	2	
HS	House Sparrow	Passer domesticus	Red		Yes	19		6	13
JD	Jackdaw	Coloeus monedula	Green			1	2	1	
K.	Kestrel	Falco tinnunculus	Amber			2	1	1	
MG	Magpie	Pica pica	Green			4	1		1
MP	Meadow Pipit	Anthus pratensis	Amber			1			
PW	Pied Wagtail	Motacilla alba	Green			3			
R.	Robin	Erithacus rubecula	Green			2			2
S.	Skylark	Alauda arvensis	Red		Yes				1
SG	Starling	Sturnus vulgaris	Red		Yes	33		6	
WP	Woodpigeon	Columba palumbus	Amber			8	5	6	7
WR	Wren	Troglodytes troglodytes	Amber			1			1

Common and scientific names in this list were sourced from BOU British List 9th Report (2017)



Breeding bird survey results

Site Name: Ferry Road, Felixstowe

Project No: 65206261

Date of Survey: April 2022 - July 2022

Surveyor(s): Sophie Barrell



BTO Code	Common name	Scientific name	восс	Schedule 1	NERC Act 2006	Visit 1	Visit 2	Visit 3	Visit 4	Visit 5	Visit 6
B.	Blackbird	Turdus merula				2	3	2	1	5	1
вн	Black-headed Gull	Chroicocephalus ridibundus	Amber						1	1	3
ВТ	Blue Tit	Cyanistes caeruleus				1	1	4	2		1 and 1 family group
BZ	Buzzard	Buteo buteo							1		
C.	Carrion Crow	Corvus corone				1		3	3	3	1
СН	Chaffinch	Fringilla coelebs				2					
CD	Collared Dove	Streptopelia decaocto				1		1			1
СК	Cuckoo	Cuculus canorus	Red		Yes		1			1	
D.	Dunnock	Prunella modularis	Amber		Yes	2	1	1			
FP	Feral pigeon	Columba livia domestica								8	
GO	Goldfinch	Carduelis carduelis				2		2	9	3	10
GS	Great Spotted Woodpecker	Dendrocopos major								1	
GT	Great Tit	Parus major								1	1 family group
GR	Greenfinch	Carduelis chloris	Red			1					
HG	Herring Gull	Larus argentatus	Red		Yes	1	3		1	2	1
НМ	House Martin	Delichon urbica	Red					7	12	8	13
HS	House Sparrow	Passer domesticus	Red		Yes		5	11	15	11	7
JD	Jackdaw	Coloeus monedula				1			4	3	1
K.	Kestrel	Falco tinnunculus	Amber			1					
LB	Lesser Black- backed Gull	Larus fuscus	Amber			1		1	3	3	16
LI	Linnet	Carduelis cannabina	Red		Yes			2			

BTO Code	Common name	Scientific name	восс	Schedule 1	NERC Act 2006	Visit 1	Visit 2	Visit 3	Visit 4	Visit 5	Visit 6
MG	Magpie	Pica pica					2	2	3	1	
PH	Pheasant	Phasianus colchicus				1	1	1		1	
PW	Pied Wagtail	Motacilla alba					1				
RL	Red-legged Partridge	Alectoris rufa				2					
R.	Robin	Erithacus rubecula				3				1	1
Rook	Rook	Corvus frugilegus	Amber			2					
S.	Skylark	Alauda arvensis	Red		Yes		3	1	1	1	1
SG	Starling	Sturnus vulgaris	Red		Yes	1	2	17	4	2	2
SD	Stock Dove	Columba oenas	Amber						2		
SI	Swift	Apus apus	Red					2	1	8	1
WH	Whitethroat	Sylvia communis	Amber							2	
WP	Woodpigeon	Columba palumbus	Amber			0	5	6	6	5	8
WR	Wren	Troglodytes troglodytes	Amber			2	2	1		1	1

Common and scientific names in this list were sourced from BOU British List 9th Report (2017)



Appendix 8.8

Impact assessment and recommendations summary



Impact Assessment and Recommendations Summary

Important Ecological Feature	Geographic Importance of Ecological Feature	Description of Effect ¹	Characterisation of Effect ²	Sensitivity of Feature	Significance of Effect without Mitigation	Mitigation & Avoidance Measures	Residual Significance of Effect	Compensation Measures
			S	Statutory Designa	ted Sites			
Deben Estuary Ramsar and SPA Alde-Ore Estuary Ramsar and SPA Stour and Orwell Estuaries Ramsar and SPA	International	scoped in within the Habitats Regulations Assessment Recreational Avoidance and Mitigation Strategy (HRA) ³ as being threatened by increased pressure through increased visitation, which will be affected by increasing numbers of residential developments within a 13 km buffer of these sites.	characterise and detail	the potential effect	ts of the proposed de	or report to inform an Appropriate Assessnevelopment, alone and in combination with ce, mitigation, or compensation measures	other developments,	and the magnitude thereof on
Sandlings SPA		Long term increase in recreational pressure from increased residential population causing disturbance to, and reduction in feeding activity, fitness, and survival rates of, breeding, migratory, and wintering bird assemblages. ⁴ It may also lead to increased nutrification via dog walking.						
Orfordness-Shingle Street SAC	International	Orfordness-Shingle Street SAC is scoped into the HRA (Section 5.1) as being at risk from increasing pressure from public access and disturbance, with the area around Shingle Street being publicly accessible and a popular designation for visitors. The increase in number of dwellings and thereby population within 13 km of the Shingle Street part of the SAC may results in increased visitation pressure and increased trampling damage to the vegetated shingle as well as nutrient enrichment from dog walking.	of the proposed develo necessary avoidance, r	pment, alone and	in combination with o	ent by the competent authority, will be req ther developments, and the magnitude the will be set out in the sHRA or report.		

Includes Magnitude and Extent.
 Includes Nature of change, Duration, Permanence, and Level of certainty.
 Recreational Disturbance Avoidance & Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District And East Suffolk Councils (https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf)
 https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf



Important Ecological Feature	Geographic Importance of Ecological Feature	Description of Effect ¹	Characterisation of Effect ²	Sensitivity of Feature	Significance of Effect without Mitigation	Mitigation & Avoidance Measures	Residual Significance of Effect	Compensation Measures
Alde-Ore & Butley Estuaries SAC	International	Alde-Ore & Butley Estuary SAC is excluded from the Suffolk Recreation avoidance Mitigation Strategy within HRA (Section 5.1) due to the absence of concern regarding public access and disturbance to its notified features. Therefore, there will be no anticipated indirect effect from the development via increased public access and recreational pressures. Given that the SAC is located >9 km from the site and is separated by the River Deben, there are no direct impacts anticipated and the magnitude of change will be Negligible .	 Neutral change; Duration not applicable; Permanence not applicable; Reasonable certainty. 	Medium	No Significance	Avoidance None required. Mitigation None required.	No Significance	None required.
Deben Estuary SSSI Orwell Estuary SSSI	National	Deben Estuary SSSI and Orwell Estuary SSSI are constituent components of Deben Estuary Ramsar and SPA, and Stour and Orwell Estuaries Ramsar and SPA internationally designated sites. The SSSI are designated for the same features as the internationally designated sites. Therefore, potential effects to the SPA and Ramsar sites as described above applies here. Long term increase in recreational pressure from increased residential population causing disturbance to, and reduction in feeding activity, fitness, and survival rates of, breeding, migratory, and wintering bird assemblages. ⁵ It may also lead to increased nutrification via dog walking.	alone and in combinati an Appropriate Assess report.	on with other dev	elopments on these \$	uary SPA and Ramsar and the Stour and CSSSI and the magnitude thereof will be ass necessary avoidance, mitigation, or compe	essed within the sepa	arate sHRA, or report to inform
Landguard Common SSSI	National	Long term increase in recreational pressure from increased residential population causing disturbance to,	Adverse change;	High	Minor	Avoidance Provision of suitable on-site dog walking routes (aiming for a 2.7 km route	No Significance	None required as long as avoidance and/or mitigation is employed.

 $^{^{5}\} https://www.eastsuffolk.gov.uk/assets/Planning/Section-106/Habitat-mitigation/Suffolk-HRA-RAMS-Strategy.pdf$



Important Ecological Feature	Geographic Importance of Ecological Feature	Description of Effect ¹	Characterisation of Effect ²	Sensitivity of Feature	Significance of Effect without Mitigation	Mitigation & Avoidance Measures	Residual Significance of Effect	Compensation Measures
		and reduction in feeding activity, fitness, and survival rates of, breeding bird assemblages. It may also lead to increased nutrification via dog walking., though the reserve has a visitors' centre with designated dogs-on-short-leashes-only areas with dog waste bins which will manage visitor pressure. Historic damage to shingle vegetation on the southern tip by visitors has decreased an shingle vegetation is reportedly recovering following installation of a boardwalk. The increase in the number of dwellings in Felixstowe (currently understood to be 11,295 according to the 2011 census data for the area) will increase by 150 (a 0.013% increase) as a result of the development with a population increase of 2.2 persons per household (330 total). Between the small scale of the population increase relative to baseline, the nature of the SSSI, and the distance between the two with presence of greenspace and dog walking routes on and around the proposed development, the magnitude of change is considered to be Negligible .	 Long term, operational phase only; Temporary but daily duration; Reasonable certainty. 			including the on-site Public Right of Way), off-leash play areas, and dog waste bins should be designed into the scheme to provide alternative dog walking and recreational routes locally and reduce visitor pressure on the SSSI. Mitigation If the above avoidance including the 2.7 km walking route is achievable on site, no further mitigation will be required. If avoidance is not achievable, or can only be delivered in part, then additional mitigation could include: • Leaflets and signage provided to new homeowners to make them aware of on-site and nearby public walking routes. • Financial contribution to Landguard Common SSSI for employment of a parking warden to help manage visitor numbers.		
			No	n-Statutory Desig	nated Sites			
Kings Fleet CWS	Local	A publicly accessible track and footpath run along part of the north side of Kings Fleet CWS. Therefore, given the proximity of the CWS to the site, there may be an increase in recreational pressure from increased residential population causing disturbance to, and reduction in feeding activity, fitness, and survival rates of, breeding bird assemblages. It may also lead to increased nutrification of the waterway via dog walking.	 Adverse change; Long term, operational phase only; Temporary but daily duration; Uncertain. 	Medium	Minor to Moderate	Avoidance Provision of suitable on-site dog walking routes (aiming for a 2.7 km route including the on-site Public Right of Way), off-leash play areas, and dog waste bins should be designed into the scheme to provide alternative dog walking and recreational routes locally and reduce visitor pressure on the SSSI. Mitigation	No Significance	None required as long as avoidance and/or mitigation is employed.



Important Ecological Feature	Geographic Importance of Ecological Feature	Description of Effect ¹	Characterisation of Effect ²	Sensitivity of Feature	Significance of Effect without Mitigation	Mitigation & Avoidance Measures	Residual Significance of Effect	Compensation Measures
		The number of dwellings within 2 km of Kings Fleet CWS is unknown, though this area comprises only the north-east end of Felixtowe, therefore the number of dwellings is expected to be lower than the above quoted 11,295 and the additional 150 dwellings will increase the number of dwellings nearby by >0.013%. Given the distance between the site and the CWS however, it is considered unlikely that there will be a significant increase in visitor pressure to the CWS. Therefore, the anticipated magnitude of effect is Low .				If the above avoidance including the 2.7 km walking route is achievable on site, no further mitigation will be required. If avoidance is not achievable, or can only be delivered in part, then additional mitigation could include provision of leaflets and signage to new homeowners to make them aware of on-site and nearby public walking routes.		
Felixtowe Ferry CWS	Local	A publicly accessible footpath runs along the CWS Tomline Wall which is frequently used by dog walkers. Therefore, given the proximity of the CWS to the site, there may be an increase in recreational pressure from increased residential population causing disturbance to reptile populations and breeding birds that occur here. It may also lead to increased nutrification of the waterway via dog walking. The number of dwellings within 2 km of Kings Fleet CWS is unknown, though this area comprises only the north-east end of Felixtowe, therefore the number of dwellings is expected to be significantly lower than the above quoted 11,295 and the additional 150 dwellings will increase the number of dwellings nearby by >0.013%. Given the distance between the site and the CWS however, it is considered unlikely that there will be a significant increase in visitor pressure to the CWS. Therefore, the anticipated magnitude of effect is Low .	 Adverse change; Long term, operational phase only; Temporary but daily duration; Uncertain. 	Low	Minor	Avoidance Provision of suitable on-site dog walking routes (aiming for a 2.7 km route including the on-site Public Right of Way), off-leash play areas, and dog waste bins should be designed into the scheme to provide alternative dog walking and recreational routes locally and reduce visitor pressure on the SSSI. Mitigation If the above avoidance including the 2.7 km walking route is achievable on site, no further mitigation will be required. If avoidance is not achievable, or can only be delivered in part, then additional mitigation could include provision of leaflets and signage to new homeowners to make them aware of on-site and nearby public walking routes.	No Significance	None required.



Important Ecological Feature	Geographic Importance of Ecological Feature	Description of Effect ¹	Characterisation of Effect ²	Sensitivity of Feature	Significance of Effect without Mitigation	Mitigation & Avoidance Measures	Residual Significance of Effect	Compensation Measures
	_			Habitats on	Site		_	
h2a – Hedgerow (Priority Habitat)	Local	There will be minor damage to the existing boundary hedgerow via removal of ~13 m length of hedgerow. This magnitude of this change is considered Low given that the majority of the hedgerow (~327 m) will be retained.	 Adverse change; Long term, construction and operational phases; Permanent; Absolute certainty. 	Low	Minor	Length of hedgerow to be removed will be minimised insofar as possible within the scheme design to avoid unnecessary hedgerow loss. Mitigation Retained hedgerow should be protected from accidental damage with temporary (e.g. Heras) fencing positioned ≥1 m from the hedgerow base.		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). 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. 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.
				Species on	Site			
Reptiles	Local	Loss of hedgerow and marginal grassland habitat over a minor length of the site boundary (~13 m) will reduce available refuge, foraging, and dispersal habitat. Magnitude of change is anticipated to be Negligible given the amount proportion of habitat to be lost compared to that retained and the habitat connectivity at the landscape scale.	 Adverse change; Long term, construction and operational phases; Permanent; Reasonable certainty. 	Low	No Significance	Avoidance None required. Mitigation None required.	No Significance	None required.
		Vegetation clearance and topsoil stripping during the construction phase, particularly along the	Adverse change;	Low	Minor	Avoidance Hedgerow and grassland margins where amphibians may be present should be	No Significance	None required.



Important Ecological Feature	Geographic Importance of Ecological Feature	Description of Effect ¹	Characterisation of Effect ²	Sensitivity of Feature	Significance of Effect without Mitigation	Mitigation & Avoidance Measures	Residual Significance of Effect	Compensation Measures
		hedgerow and grassland margins, may result in injury or death of individual reptiles. The magnitude of change to any local population is anticipated to be Low given the limited area of suitable habitat on site.	 Short term, construction phase only; Temporary; Reasonable certainty. 			retained insofar as possible. Any vegetation clearance should take place outside the hibernation season (October to February inclusive. Mitigation Where avoidance of damage to habitats is not possible, vegetation removal should be undertaken via a two-stage cut. This should be implemented as: • Grassland and hedgerow should be cut no lower than 150 mm and 300 mm above ground level respectively; • The area should be checked by an Ecological Clerk of Works (ECoW); • Remaining vegetation can be cut to ground level. Any widespread reptiles found can be carefully removed to an area of retained habitat. Retained habitats should be protected with temporary fencing.		
Breeding birds (excluding skylark)	Local	Habitat loss through clearance of ~13 m of hedgerow and 3.8 ha of arable land will result in loss of potential nesting habitat for widespread and arable bird species. The magnitude of change is anticipated to be Negligible due to the prevalence of arable habitat in the landscape and the retention of the majority of hedgerow on site along with prescribed new hedgerow planting.	 Adverse change; Long term, construction and operational phases; Permanent; Reasonable certainty. 	Low	No Significance	Avoidance None required. Mitigation None required.	No Significance	None required.



Important Ecological Feature	Geographic Importance of Ecological Feature	Description of Effect ¹	Characterisation of Effect ²	Sensitivity of Feature	Significance of Effect without Mitigation	Mitigation & Avoidance Measures	Residual Significance of Effect	Compensation Measures
		Clearance of ~13 m of hedgerow habitat and 3.8 ha of arable land during the breeding season (March to August) and accidental hedgerow damage throughout construction phase may result in breeding failure, injury or death of adult breeding birds, damage or destruction of eggs and / or nests, abandonment of nests and / or death of dependent young. The magnitude of change is anticipated to be Medium .	 Adverse change; Short term, construction phase only; Temporary; Reasonable certainty. 	Medium	Moderate	Vegetation clearance (hedgerow and arable) should avoid the breeding and nesting season (e.g. clear habitat only between September and February). Mitigation If for any reason prescribed avoidance measures are not feasible, an ECoW should undertake pre-work checks of these habitats within 24 hours prior to habitat clearance. Clearance should only be undertaken under ECoW supervision following written or verbal approval. If any breeding or nesting birds are located, a minimum 5 m radius buffer (or larger, at the ECoW's discretion) will be implemented to protect the nest until young have fledged. Retained hedgerow habitat should be protected with temporary (e.g. Heras) fencing for the duration of the construction phase.	No Significance	None required.
Breeding Skylark	Local	Clearance of 3.8 ha of arable land during the breeding season (March to August) may result in injury or death of adult breeding birds, damage or destruction of eggs and / or nests, and / or death of dependent young. The magnitude of change is anticipated to be Medium.	 Adverse change; Short term, construction phase only; Temporary; Reasonable certainty. 	Medium	Moderate	Arable crop clearance should avoid the breeding and nesting season (e.g. clear habitat only between September and February). Mitigation If for any reason prescribed avoidance measures are not feasible, an ECoW should undertake pre-work checks of these habitats within 24 hours prior to habitat clearance. Clearance should only be undertaken under ECoW supervision following written or verbal approval. If any breeding or nesting birds are located, a minimum 5 m radius buffer (or larger, at the ECoW's discretion) will be implemented to protect the nest until young have fledged. Retained hedgerow habitat should be protected with temporary (e.g. Heras)	No Significance	None required.



Important Ecological Feature	Geographic Importance of Ecological Feature	Description of Effect ¹	Characterisation of Effect ²	Sensitivity of Feature	Significance of Effect without Mitigation	Mitigation & Avoidance Measures	Residual Significance of Effect	Compensation Measures
						fencing for the duration of the construction phase.		
		Clearance of arable land (3.8 ha) will result in the loss of one skylark breeding territory, confirmed through breeding bird surveys carried out in 2022. The magnitude of change is anticipated to be Low , given the prevalence of suitable habitat in the local area.	 Adverse change; Long term, construction and operational phases; Permanent; Reasonable certainty. 	Medium	Minor to Moderate	Avoidance Avoidance of habitat clearance cannot be avoided due to the need to clear the site for the proposed development. Mitigation No on-site mitigation is possible.	Minor to Moderate	Two skylark foraging plots should be created on nearby suitable arable land and maintained for a minimum of five years post-development completion. Skylark plots should be created and maintained as per RSPB guidance ⁶ .
Wintering birds	Not significant at a Local level	a Clearance of arable land (3.8 ha) and minor hedgerow loss (~13 m) will result in the loss of potential wintering bird feeding habitat. However, as the site is likely only to be used by common assemblages and no notable species is likely to use the site, the magnitude of change is anticipated to be Negligible .	 Adverse change; Long term, construction and operational phases; Permanent; Reasonable certainty. 	Low	No Significance	Avoidance None required. Mitigation None required.	No Significance	None required.
Foraging and Commuting Bats	Local	Removal of a minor length of hedgerow is unlikely to significantly affect the ability of bats of widespread species to commute along the site boundaries, as the gap to be created is expected to be only ~13 m and research shows that the probability of greater horseshow (<i>Rhinolophus ferrumequinum</i>) bats, a particularly sensitive species, to use hedgerows is higher when gaps between hedgerows are ≤ 38 m in length ⁷ . Therefore, the magnitude of change from hedgerow loss is considered Negligible .	 Adverse change; Long term, construction and operational phases; Permanent; Reasonable certainty. 	Medium	No Significance	Avoidance None required. Mitigation None required.	No Significance	None required.
		Increased artificial lighting above the baseline nighttime light levels of	Neutral change;	Medium	No Significance	Avoidance	No Significance	None required.

⁶ http://www.sdfarmbirds.com/_app_/resources/documents/www.sdfarmbirds.com/unused/rspb_skylark_plots.pdf

⁷ Pinaud, D., Claireau, F., Leuchtmann, M. and Kerbiriou, C. (2018) Modelling landscape connectivity for greater horseshoe bat using an empirical quantification of resistance. Journal of Applied Ecology, 55, pp. 2600-2611, DOI: 10.1111/1365-2664.13228.



Important Ecological Feature	Geographic Importance of Ecological Feature	Description of Effect ¹	Characterisation of Effect ²	Sensitivity of Feature	Significance of Effect without Mitigation	Mitigation & Avoidance Measures	Residual Significance of Effect	Compensation Measures
		the area, particularly upon the hedgerow habitat, is likely to reduce use of this habitat by foraging and commuting bats. At present, no lighting design strategy has been produced. Therefore, it is assumed that there will be no increase in artificial lighting along the hedgerow at any point and therefore the anticipated magnitude of change is Negligible . If for any reason light levels along the hedgerow artificially increases as a result of the development, this impact will require reassessment and mitigation or compensation may be necessary.	 Duration not applicable; Permanence not applicable; Reasonable certainty. 			No avoidance necessary as long as nighttime light levels along hedgerows do not increase above baseline as a result of the development. If for any reason this is not the case, this impact will require reassessment and mitigation or compensation may be necessary. Mitigation No avoidance necessary as long as nighttime light levels along hedgerows do not increase above baseline as a result of the development. If for any reason this is not the case, this impact will require reassessment and mitigation or compensation may be necessary.		
Badger	Not important at a Local level	Loss of ~3.8 ha of arable foraging habitat and a minor area of foraging grassland and hedgerow habitat (~13 m). Magnitude of change is anticipated to be Low .	 Adverse change; Long term, construction and operational phases; Permanent; Absolute certainty. 	Low	Minor	Avoidance Hedgerow and grassland habitats will be predominately retained in the proposed site design. Mitigation Retained habitats should be protected with temporary fencing.	Minor	Habitat creation in the form of the north-west greenspace and other scattered soft landscaping with native species-rich planting and seed mixtures will compensate for the lost foraging habitat.
		Potential for damage or destruction of newly created setts if badger move onto the site between the survey date and works being undertaken. Magnitude of change is anticipated to be Medium .	 Adverse change; Short term, construction phase only; Permanent; Uncertain. 	Medium	Moderate	Avoidance An Ecologist should undertake a site walkover immediately prior to work commencing on site to check for new badger sett building activity. Confirmation of the absence of activity should be confirmed by the ecologist in writing before work commences.	No Significance	None required, unless badger sett building activity is found on site.
						Mitigation Any badger sett discovered should be demarked on the ground and on site plans with a 30 m exclusion buffer and an ecologist contacted for advice on how to proceed. A mitigation may be required to legally proceed with works.		



Important Ecological Feature	Geographic Importance of Ecological Feature	Description of Effect ¹	Characterisation of Effect ²	Sensitivity of Feature	Significance of Effect without Mitigation	Mitigation & Avoidance Measures	Residual Significance of Effect	Compensation Measures
Hedgehog Local	Local	Loss of hedgerow and marginal grassland habitat over a minor length of the site boundary (~13 m) will reduce available refuge, foraging, and dispersal habitat. Magnitude of change is anticipated to be Negligible given the amount proportion of habitat to be lost compared to that retained and the habitat connectivity at the landscape scale.	 Adverse change; Long term, construction and operational phases; Permanent; Reasonable certainty. 	Low	No Significance	Avoidance None required. Mitigation None required.	No Significance	None required.
		Vegetation clearance, particularly along the hedgerow, may result in injury or death of individual hedgehog. The magnitude of change to any local population is anticipated to be Low given the limited area of suitable habitat on site.	 Adverse change; Short term, construction phase only; Temporary; Reasonable certainty. 	Low	Minor	Avoidance Hedgerows should be retained insofar as possible. Any vegetation clearance should take place outside the hibernation season (October to March inclusive). Mitigation Where avoidance of damage to habitats is not possible, vegetation removal should be via a two-stage cut. This should be implemented as: • Hedgerow should be cut no lower than 300 mm above ground level respectively; • The area should be checked by an Ecological Clerk of Works (ECoW); • Remaining vegetation can be cut to ground level. Any hedgehog found can be carefully removed to an area of retained habitat. Retained habitats should be protected with temporary fencing.		None required.
Brown hare	Not important at a Local level	Loss of arable (~3.8 ha) and marginal grassland habitat over a minor length of the site boundary (~13 m) will reduce available breeding and foraging habitat. Magnitude of change is anticipated to be Negligible given the amount of similar habitat at the landscape scale and the mobility of the species.	 Adverse change; Long term, construction and operational phases; Permanent; Reasonable certainty. 	Low	No Significance	Avoidance None required. Mitigation None required.	No Significance	None required.



Important Ecological Feature	Geographic Importance of Ecological Feature	Description of Effect ¹	Characterisation of Effect ²	Sensitivity of Feature	Significance of Effect without Mitigation	Mitigation & Avoidance Measures	Residual Significance of Effect	Compensation Measures
		Habitat clearance during the breeding season (February to September) may result in injury or death of breeding adults and leverets. Magnitude of change is anticipated to be Low given the availability of suitable habitat in the landscape and mobility of the species.	 Adverse change; Short term, construction phase only; Permanent; Reasonable certainty. 	Low	Minor	Avoidance Avoid impacting breeding brown hare and young by clearing arable crop habitat outside breeding season (e.g. clear between October and January only). If this is not feasible, mitigation will be required. Mitigation An ECoW should walk ahead of the habitat clearance machinery to flush any brown hare and visually search for any forms which may include dependent young. If any 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).	No Significance	None required.



Appendix 8.9

Figures





Site Boundary



DS Drawing Suitability Checked Appr'd

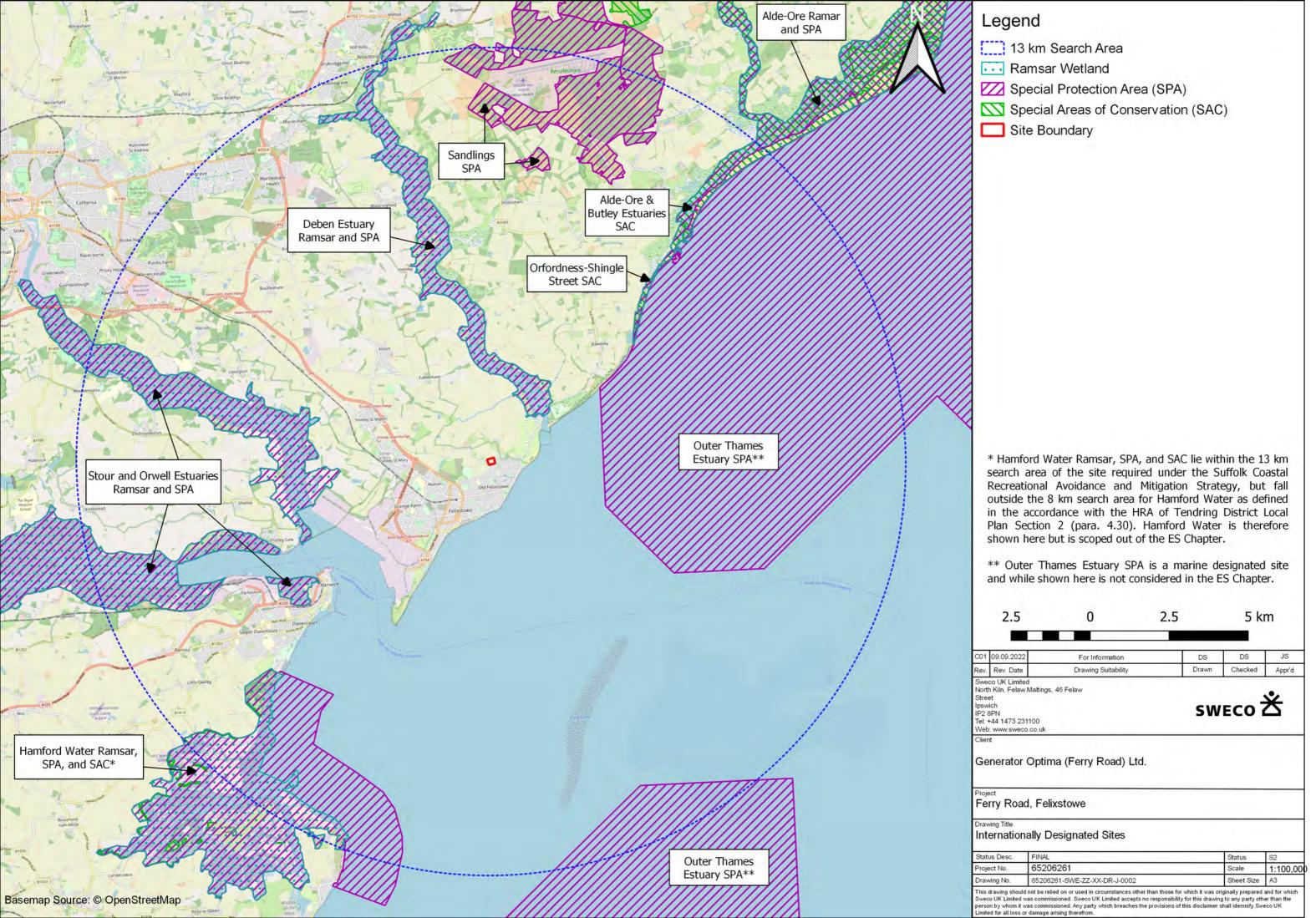
100 m

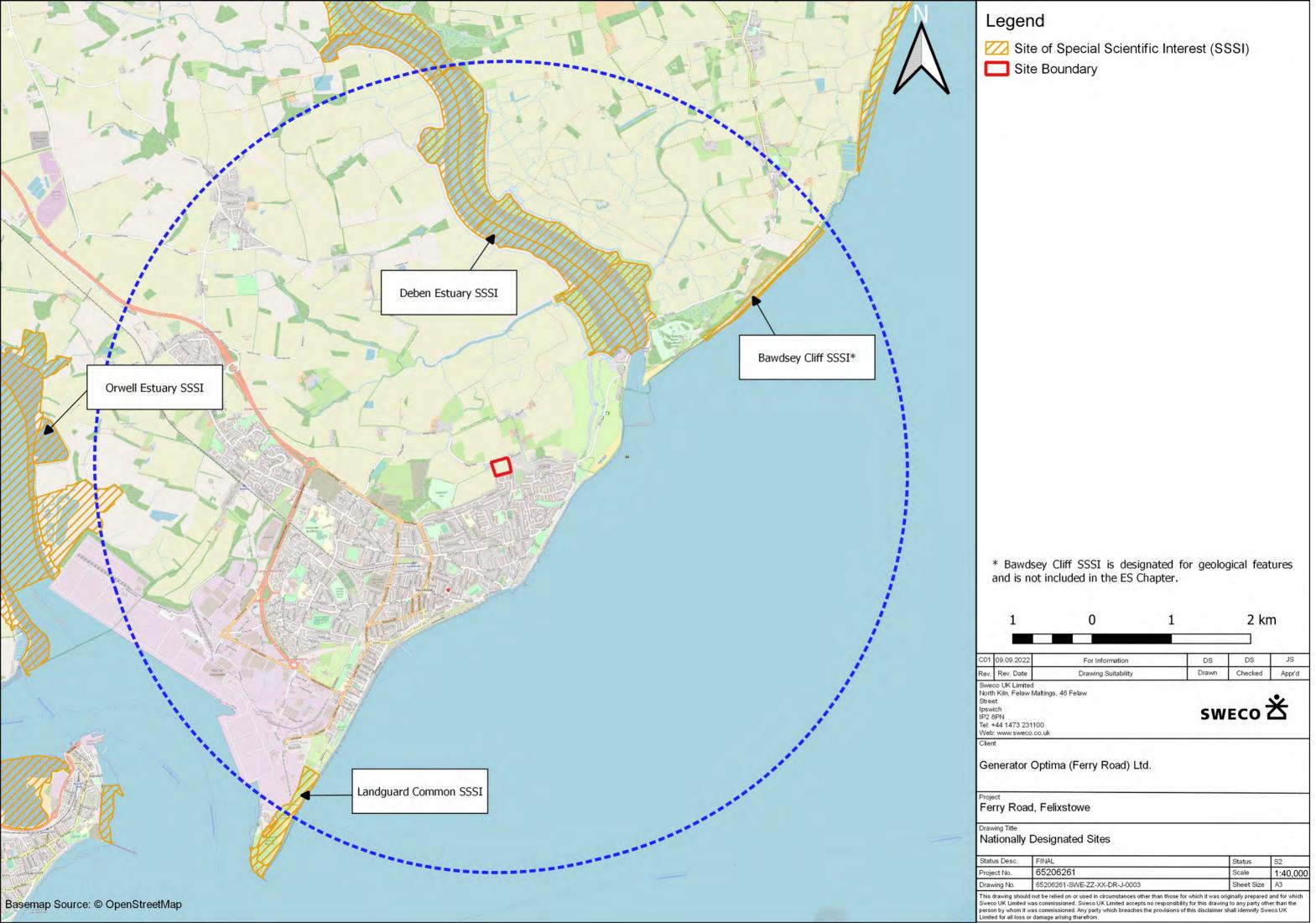
sweco 🕇

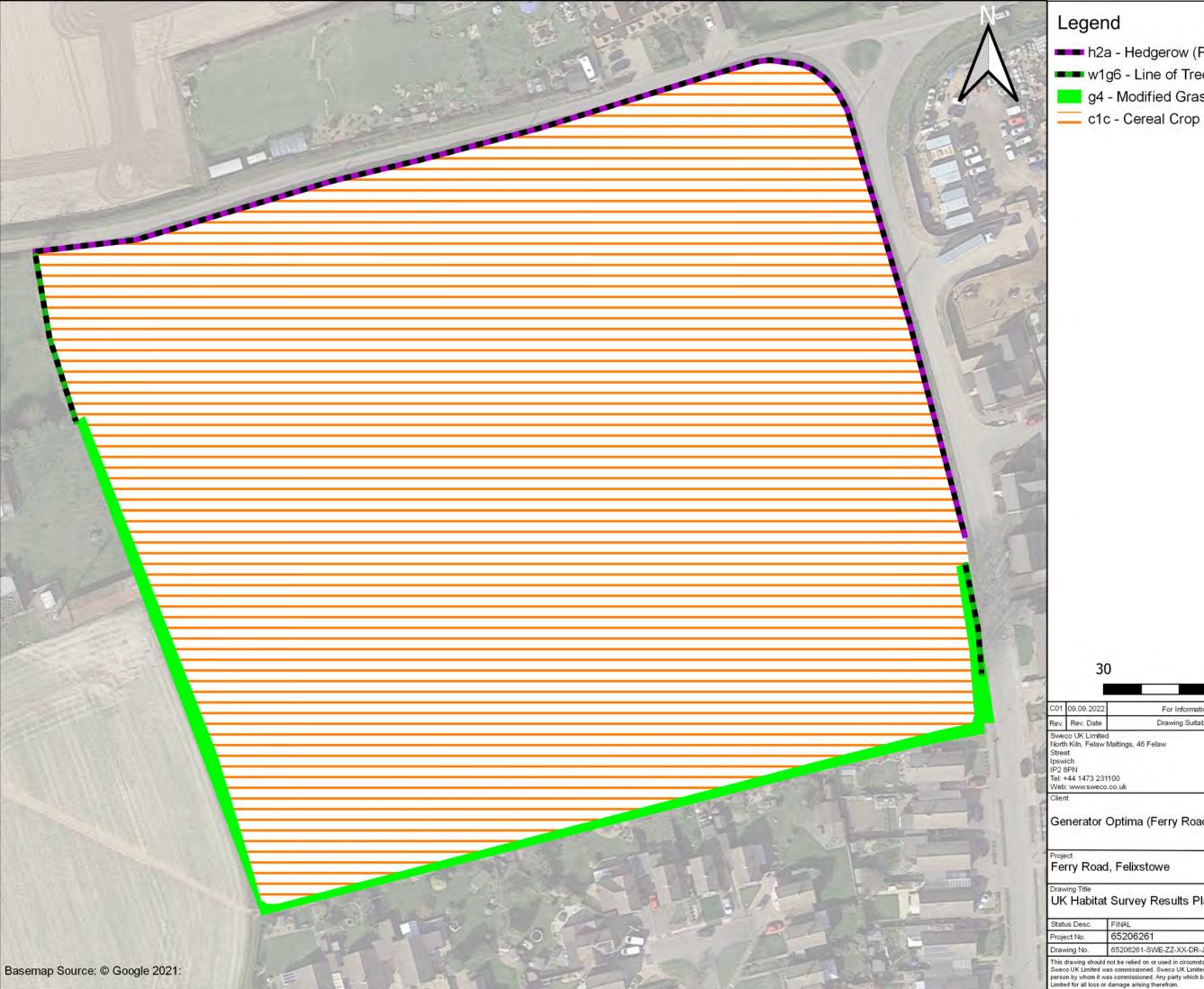
Sweco UK Limited North Kiln, Felaw Maltings, 46 Felaw

Generator Optima (Ferry Road) Ltd.

Status Desc.	FINAL	Status	S2
Project No.	65206261	Scale	1:2,500
Drawing No.	65206261-SWE-ZZ-XX-DR-J-0001	Sheet Size	A3







h2a - Hedgerow (Priority Habitat)

w1g6 - Line of Trees

g4 - Modified Grassland

DS Drawing Suitability

30 m

sweco 🕇

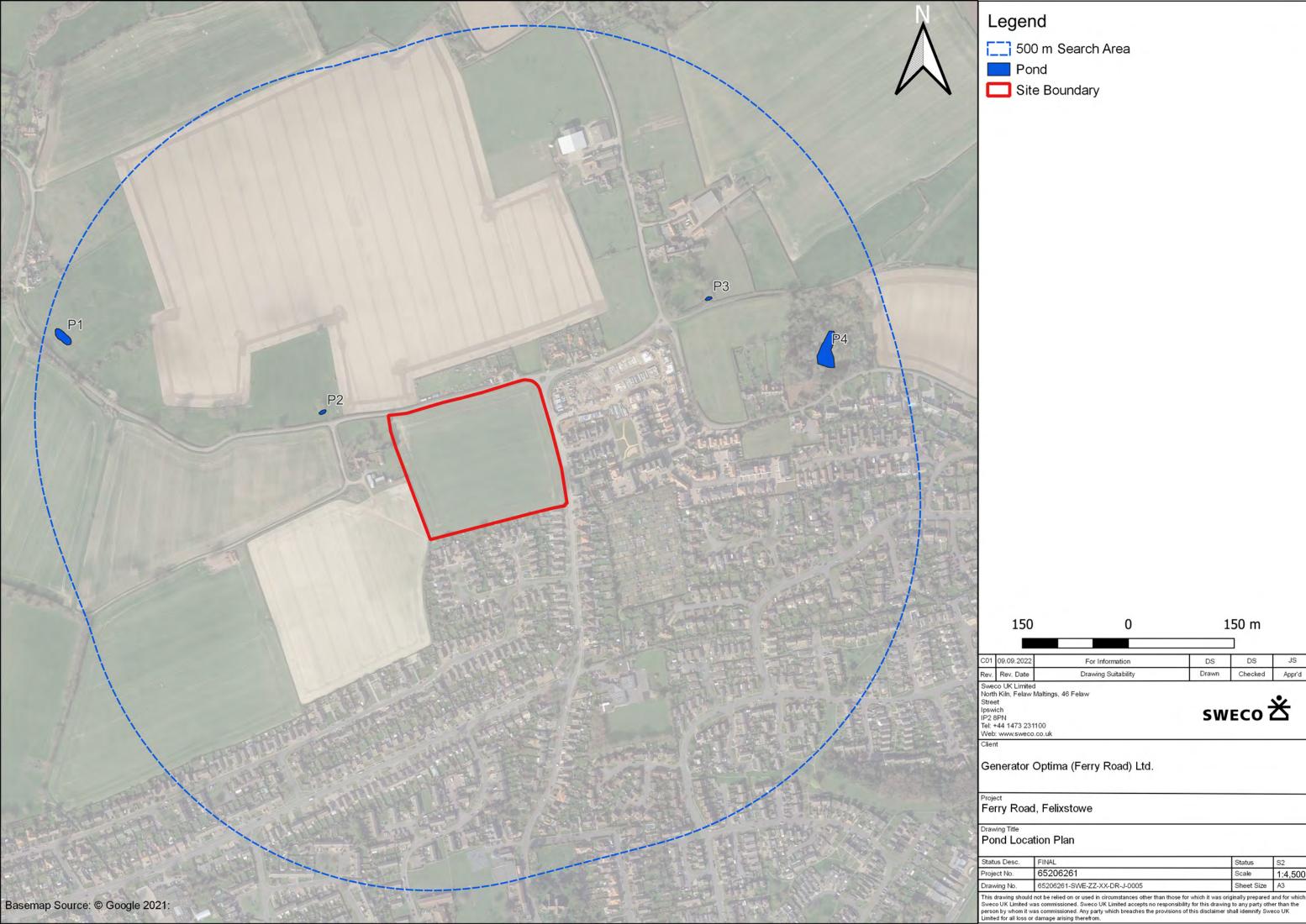
Sweco UK Limited North Kiln, Felaw Maltings, 46 Felaw

Generator Optima (Ferry Road) Ltd.

UK Habitat Survey Results Plan

Status Desc.	FINAL	Status	S2
Project No.	65206261	Scale	1:900
Drawing No.	65206261-SWE-ZZ-XX-DR-J-0004	Sheet Size	A3

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150 m

Checked Appr'd















