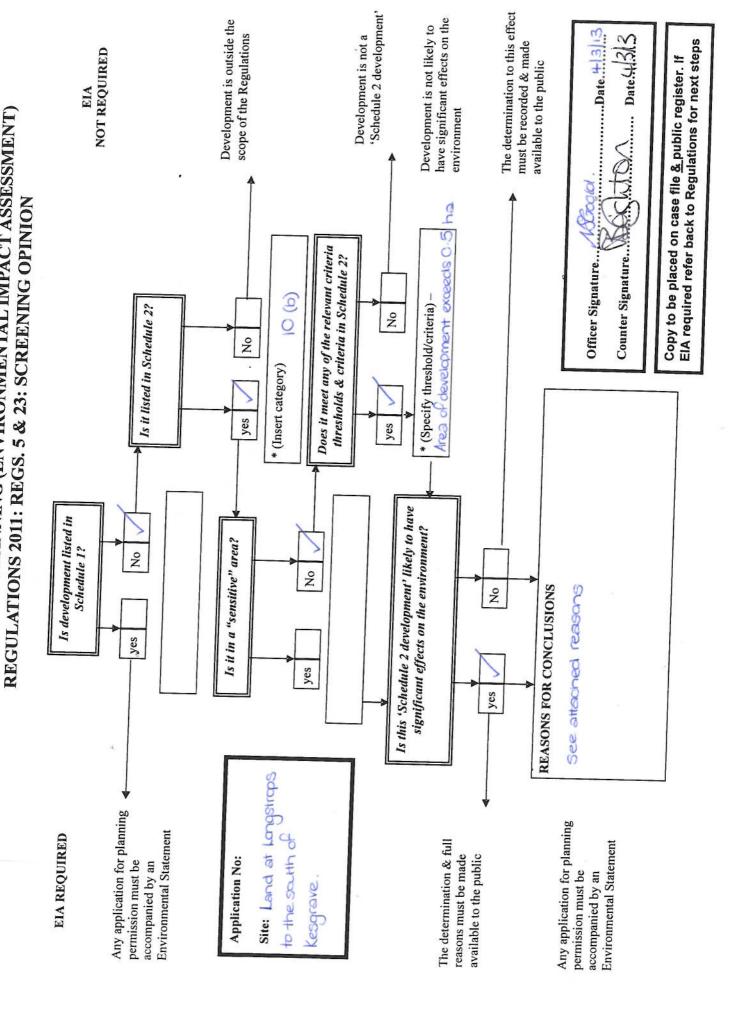
TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)



TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 2011 – REGULATION 5: SCREENING OPINION

PROPOSED HOUSING DEVELOPMENT ON LAND AT 'LONGSTROPS' TO THE SOUTH OF KESGRAVE

Introduction

In undertaking this assessment the Local Planning Authority has had full regard to the requirements of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011 along with relevant case law and documents submitted with the screening request. The Local Authority has also had full regard to its Pre-submission Core Strategy & Development Management Policies Development Plan Document. The document is continuing its progress through Examination stage. Consultation has just commenced on Main Modifications.

The development exceeds the threshold of 0.5 hectares under category 10(b) 'Urban Development Projects' of Schedule 2 of the EIA Regulations. This document sets out the assessment of the development to determine whether it is EIA development having regard to the selection criteria in Schedule 3 of the Regulations.

The development proposed would consist of 300 houses with the main vehicular access being off Century Drive with a further access off Dobbs Lane.

1. Characteristics of Development

- (a) Size 300 dwellings are proposed on the site which covers an area of 18.4 hectares.
- (b) Cumulative impact with other development is a significant issue. Suffolk Coastal is acknowledged to possess a very high quality built, natural and historic environment. Impact on the natural environment is considered to be the most significant.

The development lies to the west of the strategic growth area (2000 homes) proposed in the Core Strategy for this part of the district. No amendments are proposed to this distribution strategy in the Main Modifications (Issue 5) now out for consultation. Sustainability Appraisal (SA) and Appropriate Assessment (AA) reports which accompany the Core Strategy identify that 2000 homes in this location will result in significant impact (in isolation and cumulatively) on Natura 2000 sites and mitigation measures are required to make the development acceptable. Main Modifications (MM22, MM52) have been identified as necessary to make this requirement explicit within the Core Strategy. This document also identifies the risk to the local and strategic highway networks from the creation of 2000 new homes and the critical importance of improvements to this infrastructure in order to deliver the housing numbers. Information provided to the Inspector appointed to examine the Core Strategy also confirmed that higher levels of development had not been tested but a precautionary approach was logical given the already identified significant impact.

- The development is not the only major planning application to have been received by the Local Authority which does not accord with the strategy proposed in the Core Strategy. The potential impact of these developments in addition to the strategic development proposed through the Core Strategy clearly point to the need for a precautionary approach and therefore an EIA to be undertaken.
- (c) Use of natural resources. The development would result in the loss of grade 4 agricultural land.
- (d) The production of waste. The development would result in the production
 of waste during the construction phase and the new dwellings, once occupied,
 will result in the production of a degree of household waste.
- (e) Pollution and nuisances. The site is located in relatively close proximity to Foxhall Stadium to the south-west and Foxhall Landfill Site to the south-east. The Council is already aware of noise complaints regarding these sites received to the environmental health department from neighbouring residents.
- (f) The risk or accidents. The development is unlikely to involve the utilisation of any substances which would be a risk to the environment.

2. Location of Development

- (a) The site has a total area of approximately 18.4 hectares of grade 4 agricultural land. The housing development of Kesgrave lies to the north of the site with Dobbs Lane to the east. Foxhall Court and an area of woodland border much of the southern boundary with the remainder being adjacent agricultural land. Foxhall Road lies just over 500 metres to the south. There is a public footpath running along the northern boundary of the site.
- The development proposes two vehicular accesses; one on the northern side of the site joining up with Century Drive and a second at the south-east corner of the site joining Dobbs Lane. The local and strategic highway networks in the vicinity have been identified as requiring improvements; the critical importance of these improvements has been highlighted within the Core Strategy Main Modifications document (Issue 5).
- (c) (v) Ipswich Heaths SSSI lies adjacent to the site on the eastern side of Dobbs Lane. The Mill River Special Landscape Area lies just over 500 metres to the south of the application site. The site is just over 600 metres from a County Wildlife Site which lies to the west, just under 3 kilometres from the AONB which lies to the east of the site and approximately 3.2 kilometres from the Deben Estuary which is a designated SPA, SSSI and Ramsar Site. See commentary on cumulative impact in 1b above.
- (vii) the neighbouring areas of Kesgrave and Grange Farm have been subject to significant residential expansion over the last 15 20 years. The last remaining housing areas are nearing completion. The development proposes a significant extension to this virtually completed Grange Farm development. Such a proposal would potentially set a precedent for future expansion to the south of Kesgrave. This would potentially have a significant impact on this sensitive area.
- (viii) Commentary submitted by English Heritage in response to the Pre-Submission Core Strategy identified the need for greater emphasis to be placed on the historic environment of the district which is considered to be

particularly rich. There is a Scheduled Monument (Two Bowl Barrows) located approximately 70 metres to the north-east of the site. The area also contains a number of below ground heritage assets of archaeological interest. There are no listed buildings on the site. The closest listed building is the Farmhouse Grange which is just over 500 metres away situated centrally within the residential development of Kesgrave to the north of the site. The site is not within or adjoining a conservation area.

- The north-east corner of the site which comprises a triangular shaped parcel
 of land lies within an Area to be Protected from Development. This is
 designated as it is considered an important space for maintaining the setting
 and character of the surrounding landscape and townscape. The Core Strategy
 confirms this designation is to remain until site specific documents are
 produced.
- The site is the not the subject of a Tree Preservation Order.

3. Characteristics of the Potential Impact

The Sustainability Appraisal and Appropriate Assessment of the Core Strategy and Development Management Policies has considered and assessed the development of 7,900 new homes being built within the District between 2010 and 2027. Specifically within the Eastern Ipswich Plan Area one new allocation of 2,000 houses has been proposed and assessed. The impact of new homes in the Eastern Ipswich Policy Area above this 2000 threshold has not been robustly assessed.

The development at Longstrops proposes 300 new homes, over and above, the 2,000 strategic growth area; 180 south of Black Tiles Martlesham and (potentially) 300 homes at Trinity Park Showground. Development of 2,180 homes in the east Ipswich area has been identified as having a significant impact on Natura 2000 sites; but is a level where significant impact can be demonstrated to be successfully mitigated. No assessment of impact beyond that level has been tested. A precautionary approach is therefore justified and required. An EIA incorporating a Habitats Regulations Assessment (HRA) is the appropriate means to test this impact. This section of the screening opinion will go on to consider what the likely impacts could be and whether they are considered significant.

• The SA and AA of the Core Strategy confirm that a primary concern, in relation to new residential development, is increasing recreational impact on designated sites of nature conservation interest, particularly the Natura 2000 sites. Mitigation measures for the strategic growth of 2,000 homes requires the provision of a new country park (or similar high quality provision) and visitor management measures amongst other things. There will be a likely rise in the demand from the development for recreational facilities which is likely to have an impact on designated sites, particularly nearby Foxhall Stadium Wood County Wildlife Site to the east of the development and Ipswich Heaths SSSI to the west. Ipswich Heaths SSSI is very sensitive and is recorded as being in a state of 'unfavourable decline'. The SSSI is the habitat for the largest colony of Silver Studded Blue Butterfly in East Anglia. The development may have significant impacts on these designations. The Deben Estuary a designated SSSI, Ramsar Site and SPA and potentially the Sandlings also a designated SPA and SSSI will also experience increased visitor pressure from the

proposed development. Surveys referenced within the SA and AA documents for the Core Strategy have shown that people travel to these areas from Kesgrave and further away. Any increase in visitor numbers to these sensitive sites, especially the Deben Estuary and Sandlings could have a significant effect on the ecology of the areas.

- Surveys of the site have been carried out and found evidence of bats, reptiles (slow worms, common lizards, adders and grass snakes), and birds (6 UKBAP species discovered with 4 breeding). The site also lies close to locally and nationally designated sites. The development of the site and change from a rural to a suburban habitat will have a potentially significant impact on the species identified within the site and neighbouring sites.
- 18.4 hectares of agricultural land will be utilised by the development and as a consequence will not be available for agricultural use. The land is however low quality grade 4 agricultural land and therefore this loss is not considered to be significant.
- The site will be visible locally from Dobbs Lane to the east, Bell Lane to the west and parts of Kesgrave to the north. There will be longer views of the development afforded particularly from the south and Foxhall Road. Some of the views from the south will be partially screened by existing woodland which adjoins the site. Views of the development will be primarily restricted to this locality and as such there is not considered to be a significant impact upon the wider landscape.
- No transport assessment has been provided. Kesgrave has exceeded its originally planned housing total of 3000 and therefore there is already pressure on the local road networks particularly the junctions of Ropes Drive and the A1214. The junction between Dobbs Lane and Foxhall Road is also known to be hazardous. The development of 300 homes with associated vehicular movements is likely to have a significant impact on the local road network which is already under pressure. The scale of the development is likely to require improvements to the road network without such improvements, Annex S of the Main Modifications (Issue 5) document highlights that the local and strategic road networks may not be able to cope with the increased demand.
- There will be an impact experienced by users of the public footpath to the north and other surrounding footpaths by virtue of the presence of buildings activity and lighting in the area given that it is currently undeveloped. This impact is not however considered significant given the proximity of the development to residential dwellings to the north and surrounding road network.
- Residents living at the southern edge of Kesgrave and bordering the site will be affected to some degree by increased activity on the site but this is not considered significant.
- There is not considered to be a significant impact on air quality arising solely from the residential development proposed. The development when considered in combination with other developments coming forward in the area will lead to the generation of more traffic which is likely to impact on air quality. This issue was highlight in the Sustainability Appraisal for the Core Strategy. The cumulative impact on air quality is however unlikely to be significant.

- The site is within flood zone 1 for flood assessment and is capable of SUDS drainage, in terms of flood risk the development is unlikely to have a significant impact on the wider environment.
- The area contains a number of known below ground heritage assets of archaeological interest. The area has not been the subject of any systematic archaeological assessment but it is thought that there are three Bronze Age, maybe earlier, barrows and a large number of recorded remains in the vicinity. The development could have a significant impact on the archaeology on the site especially if any 'in-situ' preservation is required.
- There will be short term, localised environmental impacts upon local residents and the area, in terms of noise and disturbance arising from the construction phases of the development. These impacts will be expected to be short term and therefore unlikely to have a significant environmental impact.
- No ground investigation report has been submitted however there are no known contaminants on the site; it is therefore unlikely that the development will have a significant impact on the environment in this respect, although this would need to be investigated further.

Conclusions

The development exceeds the threshold in Schedule 2 10(b) of the EIA Regulations. Having regard to the criteria listed under Schedule 3 of the EIA Regulations, for the reasons outlined above, it has been determined that it is likely the development will have a significant effect on the environment. This is by virtue of the development adding to the already identified cumulative impact, of proposed residential development in this location on European designated sites of nature conservation interest. It is also considered to have a potentially damaging impact by virtue of its nature, size and location on the historic environment and highway network.