

Land off Howlett Way, Trimley St Martin
Prepared on behalf of Trinity College Cambridge

May 2020



LAND OFF HOWLETT WAY, TRIMLEY ST MARTIN PLANNING STATEMENT

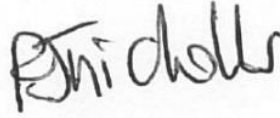
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Quality Assurance

Site name: Land off Howlett Way, Trimley St Martin
Client name: Trinity College Cambridge
Type of report: Planning Statement

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Date 4 May 2020

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Date 20 December 2019

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Date 2 May 2020



1.0 Introduction

- 1.1 This Planning Statement has been prepared by Bidwells on behalf of Trinity College Cambridge (hereafter “TCC”) to support an outline planning application with all matters reserved except access for residential development on land off Howlett Way, Trimley St Martin (hereafter “the site”). The boundaries of the site are shown on the Site Location Plan (7845/P100), an extract of which is provided below.

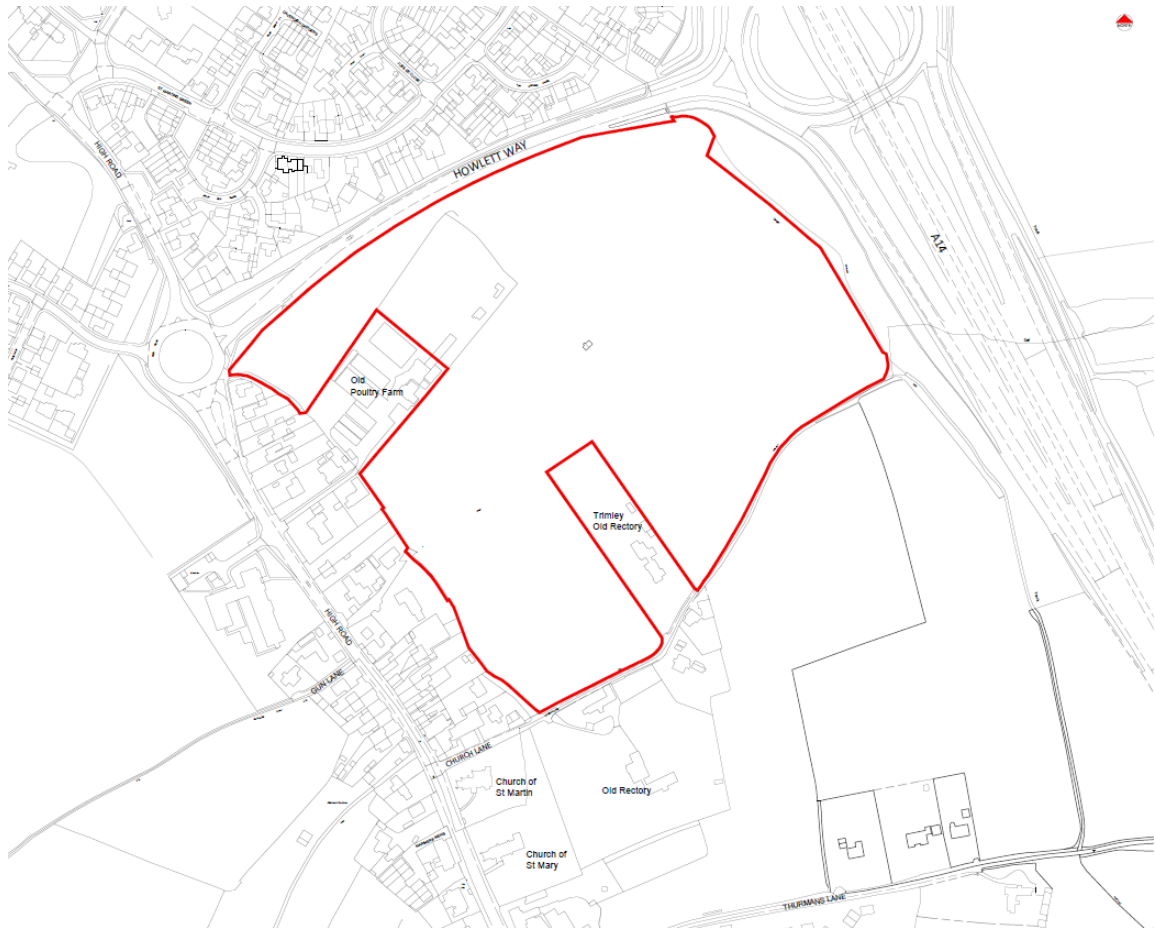


Figure 1: Site Location Plan 7845/P100

- 1.2 The application falls under the jurisdiction of East Suffolk Council (hereafter “the Council”), formed on 1 April 2019 of the former Suffolk Coastal and Waveney District Councils.
- 1.3 The description of the proposed development is as follows:

“The erection of up to 340 dwellings with open space, a new Early Years Facility, new roundabout access from Howlett Way, a foul water pumping station and associated landscaping.”

- 1.4 The site is allocated for development in the adopted Felixstowe Area Action Plan and the Suffolk Coastal Local Plan - Final Draft Local Plan (hereafter “the emerging Local Plan”) for the delivery of residential development and it forms a key component of the Council’s long-term planning strategy for the Felixstowe Peninsula. Following the emerging Local Plan examination hearings, the Inspector published initial findings, concluding the Plan is likely to be found sound with main modifications. The initial findings did not raise any issue with the allocation of Land off Howlett Way and the main modifications currently being consulted upon by the Council do not propose any substantive changes to the policy, demonstrating that significant weight can be given to the allocation of the site in the emerging Local Plan. Meanwhile, the Area Action Plan obviously remains part of the adopted development plan and also carries substantial weight.
- 1.5 The application is submitted to enable the site to be bought forward for development in accordance with the Council’s aspirations, supporting economic growth, housing supply, infrastructure delivery and helping to fulfil the role of Felixstowe, Walton and the Trimley villages as a major centre. The site is in single ownership and Trinity College Cambridge is willing to enable the prompt delivery of the site to support housing land supply in the District. Detailed engagement with the Council has been undertaken to ensure that the proposals provide a strong basis for a high-quality new development in due course in line with the aspirations of both parties.
- 1.6 This Statement seeks to demonstrate how the proposal responds to relevant planning policies and sets out reasons why planning permission should be granted. It includes a brief description of the site, the planning history and deals with the main planning considerations. It also summarises the findings of the specialist studies that have been commissioned by TCC to consider, in detail, the constraints and opportunities that affect the development of the site.

2.0 Background

The site

- 2.1 The site comprises approximately 10.54 ha of undeveloped agricultural land. No structures are present on the site with the exception of a pillbox towards the centre and some dilapidated farm buildings that previously formed part of the Old Poultry Farm to the west. Inside the eastern boundary, a bridleway runs along the wooded area, joining Church Lane to the south and crossing Howlett Way to the north. A solitary mature tree stands towards the centre of the site and an existing dwelling is located on the south within a plot bounded by trees and hedgerows. The site slopes gently from the highest points on the south-east away in each direction, with the lowest point on the eastern corner adjacent to the woodland area.
- 2.2 A more detailed site description and context appraisal is set out in the submitted Design and Access Statement.

Site context

- 2.3 The site is located on the south-east edge of Trimley St Martin, a village in the south of East Suffolk District approximately 1.69km north-west of Felixstowe at its nearest point. The site is easily accessible from the A14, linking to Howlett Way and High Road. The A14 also links to the wider Suffolk road network, providing access to Ipswich to the north-west and to the A12 in both the Colchester and Woodbridge directions.
- 2.4 The site is bordered to the north by the single carriageway road Howlett Way. To the east is a wooded area, containing a public right of way (PRoW) and separating the site from the A14 slip road. Existing dwellings are located on the western boundary along High Road consisting of two-storey detached houses towards the north of High Road and a mixture of two-storey terraced houses and bungalows to the south. Church Lane bounds the south of the site. A cluster of heritage buildings is located to the south-west.
- 2.5 Village services and facilities are available from Trimley St Martin, in the form of the Hand in Hand pub and the Trimley Sports and Social Club, with convenience shops and a post office available along High Road in Trimley St Mary to the south. Felixstowe has a more comprehensive service offering and is accessible via a short cycle, drive, bus or train ride. Good links to Ipswich extends the reach of the site to the large town centre service offering to the north-west.
- 2.6 The site is well serviced by public transport, with the Trimley St Martin bus stop adjacent to the north-east site boundary. From this stop, buses 173 and OC7 are available travelling to Woodbridge, Grange Farm and Otley as well as National Express coaches. St Martins Green bus stop is approximately 250m from the north-west boundary of the site, with buses to Ipswich available every 15 mins. Trimley train station is located approximately 1.1km south of the site with links to Felixstowe to the south-east and Ipswich to the north-west.

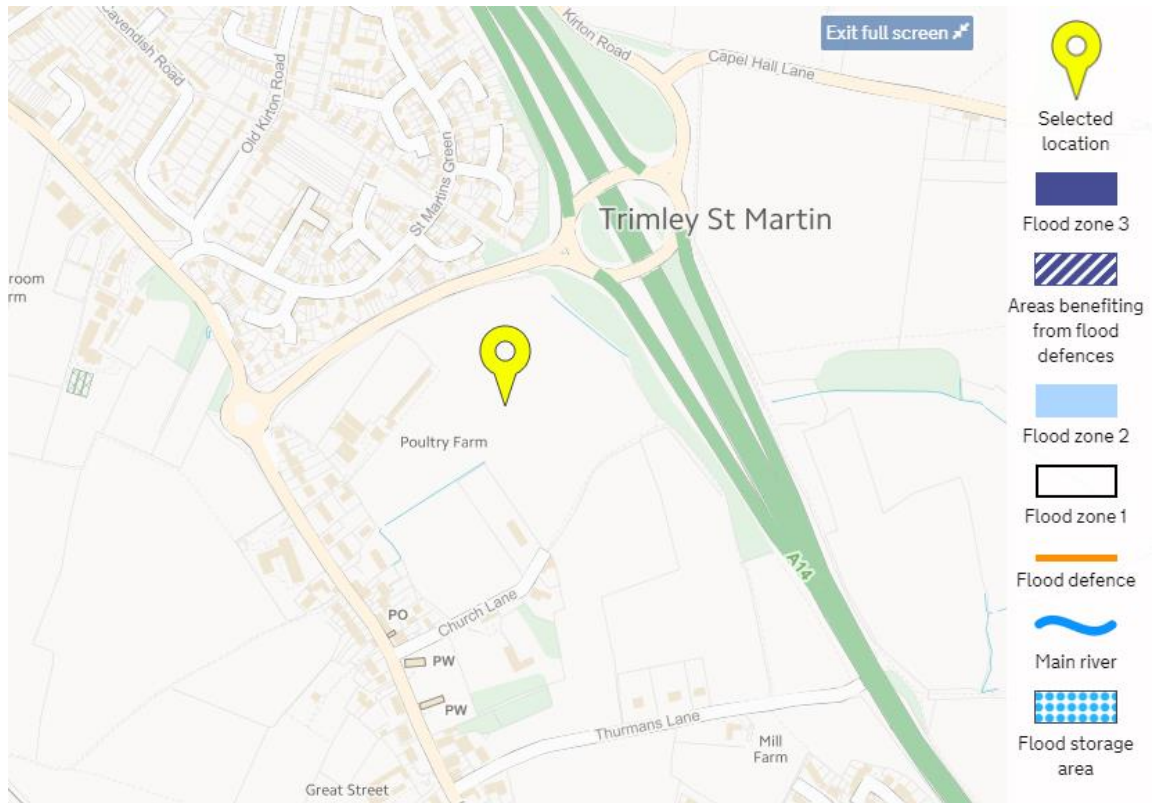


Figure 2: Extract from the Environment Agency Flood Map for Planning

2.7 The site is within Flood Zone 1, as shown above in Figure 2, which demonstrates that there is a low probability (less than 1 in 1000 annual probability) of fluvial or tidal flooding in this location.

3.0 Planning History

3.1 The site is allocated for development in the adopted and emerging replacement Local Plans, as explained in detail in Section 4 below. Specific criteria have been set out by the Council for the development of the site which this application seeks to address.

3.2 There is no planning history of direct relevance in respect of applications previously submitted for the development of this site. The following applications have been highlighted by the Council's planning records:

- DC/17/2156/TEL: Prior Approval not required 11 July 2017 – Erection of a base station comprising a 15m high monopole with an associated cabinet base within the verge of the highway on Howlett Way.
- C1186: Granted 16 July 1975 - Erection of bus passenger shelter (layby at southern end of Trimley Link Road)
- E4830: Refused 22 October 1958 – Residential development of field surrounding The Poultry Farm, Howlett Way.
- E4837: Refused 22 October 1958 - Residential development of field surrounding The Poultry Farm, Howlett Way.
- E1294A: Granted 17 August 1950 – Caravan site for 15 caravans on field surrounding The Poultry Farm, Howlett Way.
- E1294: Granted 25 April 1950 – Caravan site for 15 caravans on field surrounding The Poultry Farm, Howlett Way.

4.0 Planning Policy

- 4.1 Government legislation sets out the statutory basis through which planning decisions should be taken. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined “in accordance with the plan unless material considerations indicate otherwise”.
- 4.2 The development plan relevant to this application comprises the Suffolk Coastal Core Strategy and Development Management Policies document (adopted 2013) and the Felixstowe Peninsula Area Action Plan (FPAAP) (January 2017). These development plan documents are anticipated to be replaced shortly by the emerging replacement Local Plan for Suffolk Coastal, which has been submitted to the Secretary of State and is currently passing through independent examination in public. The National Planning Policy Framework (February 2019) is an important material consideration alongside these documents.

Suffolk Coastal District Council Local Plan and Felixstowe Peninsula Area Action Plan

- 4.3 The site is allocated for development in the Felixstowe Peninsula Area Action Plan (FPAAP) under Policy FPP7 for the delivery of approximately 360 dwellings, as shown below and on the proposals map and policy extract. The map extract below confirms that the site is located within the Physical Limits Boundaries under policy FPP2 of the FPAAP and the allocation of the site confirms the Council’s acceptance of the principle of residential development at this location, subject to the criteria listed in the policy extract below.

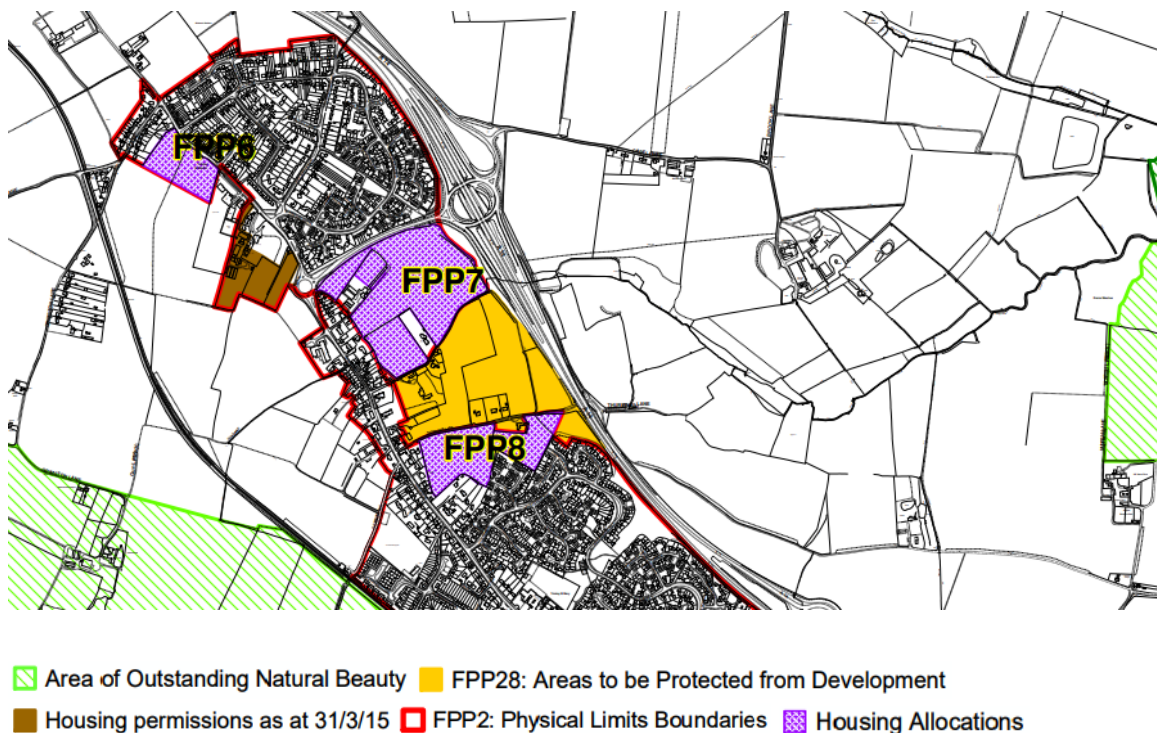


Figure 3: Extract from the Felixstowe Peninsula Area Action Plan Appendix 9 Felixstowe, Trimley St Mary and Trimley St Martin Inset Map

Policy FPP7: Land off Howlett Way, Trimley St Martin

10.64ha of land at Howlett Way, as shown on the Policies Map, is identified for approximately 360 residential units with on site open space. Development will be expected to accord with the following criteria:

- **Primary vehicular access onto Howlett Way only,**
- **No vehicular access onto Church Lane,**
- **Continuation of and links to existing Public Rights of Way Network,**
- **Retain the existing hedgerows which border the site to maintain character of the area,**
- **Affordable housing provision to be in line with Core Strategy Policy DM2,**
- **A range of housing types and tenures provided in keeping with surrounding area and in line with Core Strategy Table 3.6,**
- **Development to be of a high quality and sympathetic to the character and setting of the listed churches and The Old Rectory,**
- **Site design and layout to take into account the water mains crossing the site,**
- **On site open space and play facilities to meet needs identified in the SCDC Leisure Strategy,**
- **Archaeological assessment required with particular consideration for the existing pillbox,**
- **Air Quality assessment required,**
- **Provision of on-site early years setting.**

Figure 4: Extract of Policy FPP7: Land off Howlett Way, Trimley St Martin from the Felixstowe Peninsula Area Action Plan

- 4.4 There are a range of policies in the adopted Core Strategy and Development Management Policies DPD and the Felixstowe Area Action Plan which have been reviewed and taken into account in the emerging proposals.
- 4.5 The following policies from the adopted SCDC Core Strategy and Development Management Policies are considered relevant to this site:
- SP1 Sustainable Development – sets out the Core Strategy approach in respect of key sustainability objectives and criteria;
 - SP1A Presumption in Favour of Sustainable Development – sets out the presumption in favour of sustainable development;
 - SP2 Housing Numbers and Distribution – sets out the Core Strategy provision of at least 7,900 new homes distributed in accordance with Policy SP19 Settlement Hierarchy;
 - SP3 New Homes – sets out the need to deliver housing across the full range of size, type and tenure to meet the needs of the existing and future populations of the district;
 - SP10 A14 & A12 – sets out the requirement for developer contributions from strategic housing development towards improvements of these roads;

- SP11 Accessibility – sets out that developer contributions will be sought through conditions, legal agreements and CIL in respect of required public transport improvements or new services and facilities;
- SP12 Climate Change – development that seeks to minimise the use of natural resources, promote renewable energy and minimise flood risk will be supported;
- SP14 Biodiversity and Geodiversity – biodiversity and geodiversity will be protected and enhanced using a framework based on a network of designated sites, wildlife corridors and links, the rivers, estuaries and coast, identified habitats and geodiversity features, landscape character areas and protected species;
- SP15 Landscape and Townscape – the Council will protect and enhance the various landscape character areas within the district either through development opportunities or other strategies;
- SP16 Sport and Play – the appropriate provision, protection and enhancement of formal and informal sport and recreation facilities to accord with local requirements are to be supported;
- SP17 Green Space – the Council will seek adequate provision of well-managed green space within developments. Where adequate green space is not provided as part of a development, contributions will be sought through conditions, legal agreements or CIL;
- SP18 Infrastructure – requires infrastructure necessary to support development to be in place or provided at the required phase of the development;
- SP19 Settlement Hierarchy – sets the spatial distribution of housing to be delivered over the Plan period;
- SP21 Felixstowe with Walton and the Trimley Villages – sets out a strategy for development, including housing, in the Felixstowe Peninsula;
- DM2 Affordable Housing on Residential Sites – for development sites of 6 or more net additional housing units in major centres and towns, 1 in 3 dwellings must be affordable unless there is a lack of identified local need or site conditions, suitability and the economics of provision dictate otherwise;
- DM19 Parking Standards – development will be required to conform to the adopted parking standards Supplementary Planning Document;
- DM20 Travel Plans – new development that would have significant transport implications should be accompanied by a ‘green travel plan’;
- DM21 Design: Aesthetics – proposals that comprise poor visual design and layout, or otherwise seriously detract from the character of their surroundings will not be permitted;
- DM22 Design: Function – permission will be granted where development makes provision for functional requirements relating to access and highways including public transport, walking and cycling, water conservation and crime prevention;
- DM23 Residential Amenity – when considering applications, the Council will have regard to impacts on privacy/overlooking, outlook, daylight and sunlight, noise and disturbance, physical relationship of properties, light spillage, air quality and other forms of pollution and safety and security;
- DM24 Sustainable Construction - the Council will expect all new developments to use energy, water, minerals, materials and other natural resources appropriately, efficiently and with care in order to reduce emissions linked to changes to the climate and take into account the effects of climate change;

- DM27 Biodiversity and Geodiversity – development should protect biodiversity and geodiversity value of the site, maximise opportunities for restoration and enhancement of habitats and incorporate biodiversity conservation features where appropriate; and
- DM28 Flood Risk – new development will not be permitted on land within Flood Zone 2 or 3 unless, the applicant has satisfied the safety requirements in the NPPF Technical Guidance.

4.6 The following policies from the SCDC FPAAP are considered relevant to the site:

- FPP1 New Housing Delivery 2015 – 2027 – sets out the housing allocations contributing to the delivery of the minimum housing target in the Core Strategy, of which 430 dwellings are allocated in Trimley St Martin;
- FPP2 Physical Limits Boundaries – confirms the sustainability of sites within the physical limits boundaries drawn for all major centre settlements as defined in the Core Strategy;
- FPP7 Land Off Howlett Way, Trimley St Martin – allocation of the site for approximately 360 dwellings subject to criteria; and
- FPP27 Access to the Countryside – new residential development will be required to make provision of accessible natural green space, linked well to existing Public Rights of Way Networks, as agreed by SCDC in conjunction with Natural England.

Suffolk Coastal Local Plan Review

4.7 The emerging replacement Local Plan was submitted for examination in public on 29 March 2019 and hearing sessions took place between 20 August and 20 September 2019. The emerging Local Plan carries forward the proposed allocation of the site, accompanied by slightly amended development control criteria, as shown on the extracts below.

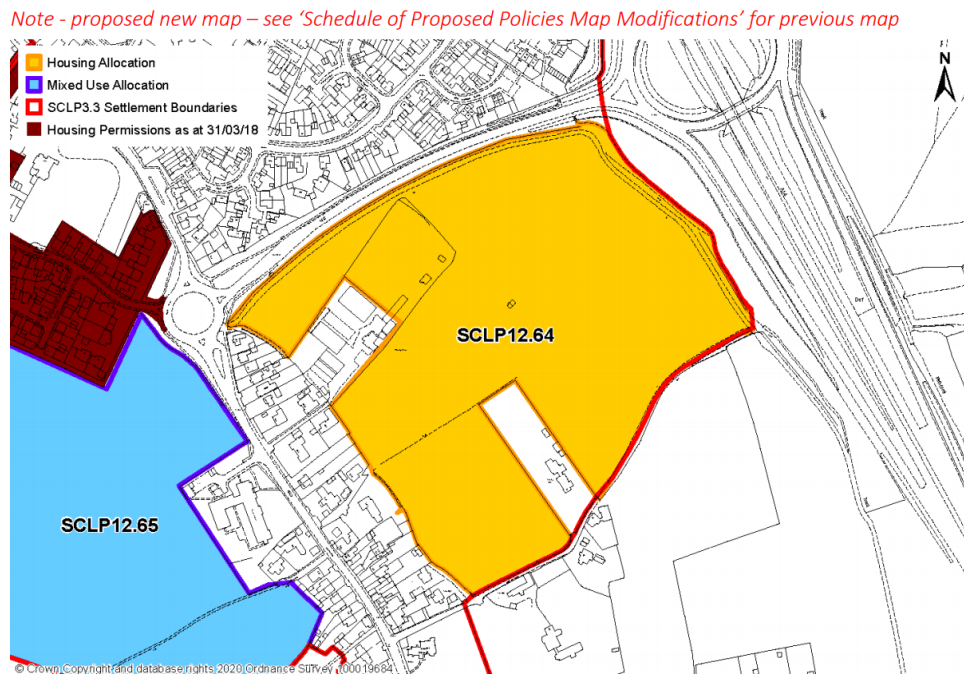


Figure 5: Extract of Suffolk Coastal Local Plan Final Draft January 2019 (Modifications Version – May 2020) - Policy SCLP12.64

Policy SCLP12.6~~4~~5: Land off Howlett Way, Trimley St Martin

10.64ha of land at Howlett Way, as shown on the Policies Map, is identified for the development of approximately 360 dwellings with on site open space.

Development will be expected to accord with the following criteria:

- a) Primary vehicular access onto Howlett Way only;
- b) A site-specific Flood Risk Assessment;
- c) No vehicular access onto Church Lane;
- d) Continuation of and links to existing Public Rights of Way Network;
- e) Retain the existing hedgerows which border the site to maintain character of the area;
- f) Affordable housing provision to be in line with Policy SCLP5.10;
- g) A range of housing types and tenures provided in keeping with surrounding area, including provision of self build plots;
- h) Contribution towards provision of a new primary school;
- i) Provision of a new early years setting on 0.1ha of land;
- j) Development to be of a high quality and sympathetic to the character and setting of the listed churches and The Old Rectory;
- k) Site design and layout to take into account the water mains crossing the site;
- l) Evidence is required to demonstrate there is adequate provision for treatment at the Water Recycling Centre or that this can be provided;
- m) On site open space and play facilities to meet needs identified in the SCDC Leisure Strategy;
- n) Archaeological assessment required with particular consideration for the existing pillbox;
- o) Provision of pedestrian/cycle links; ~~and~~
- p) Air Quality assessment required-; ~~and~~
- q) Confirmation of adequate capacity in the foul sewerage network or action to upgrade to create the required capacity.

Figure 6: Extract of Suffolk Coastal Local Plan Final Draft January 2019 (Modifications Version – May 2020) - Policy SCLP12.64

4.8 The Inspector appointed to examine the emerging Local Plan raised just two questions in relation to the proposed allocation SCLP12.65 Land off Howlett Way, Trimley St Martin ahead of the hearing sessions, neither of which raised fundamental issues with the allocation. Following the conclusion of the hearing sessions, the Inspector published his initial findings in a letter to the Council¹ in which he confirmed the emerging Local Plan is likely to be found sound subject to main modifications.

4.9 The main modifications have now been published by the Council for a consultation that extends until 10 July 2020. The only changes to the emerging policy to accompany the continued allocation of the site is the updated policy number of SCLP12.64 and the requirement for “confirmation of

¹ Examination of the Suffolk Coastal Local Plan – Inspector’s Letter dated 31 January 2020

adequate capacity in the foul sewerage network or action to upgrade to create the required capacity". This is considered to be a standard requirement of the planning application process in any case.

4.10 As no substantive changes are proposed to the emerging allocation and its accompanying policy, it should be afforded considerable weight in the determination of this application.

4.11 As with the allocation of the site, other policies in the emerging Local Plan can now also be given further weight in decision making following the Inspector's conclusion that the emerging Local Plan will likely be found sound subject to main modifications. The following policies, as proposed in the emerging Local Plan incorporating main modifications, are considered relevant to the application:

- SCLP3.1 Strategy for Growth: sets the agenda for growth in the District, including the housing target of at least 542 new dwellings per annum.
- SCLP3.2 Settlement Hierarchy: Trimley St Martin is categorised as a Large Village. In Large Villages, the residential growth strategy focuses on new housing allocations (set out in Section 12 of the emerging Local Plan) and new housing and infill within settlement boundaries.
- SCLP5.8 Housing Mix: Requires proposals provide a mix of dwellings identified in the Strategic Housing Market Assessment, or latest equivalent assessment. On proposals of 10 or more non-specialist dwellings, 50% should be accessible and adaptable under Part M4(2) of the Building Regulations.
- SCLP5.9 Self Build and Custom Build Housing: Developments of 100 dwellings or more will be expected to provide a minimum of 5% self or custom build properties.
- SCLP5.10 Affordable Housing on Residential Developments: Proposals for 10 or more dwellings or with a site area of 0.5 ha or more will be expected to provide 1 in 3 affordable dwellings. The affordable dwellings tenure split should be 50% affordable rent / social rent, 25% shared ownership and 25% discounted home ownership.
- SCLP7.1 Sustainable Transport: Development proposals should be designed from the outset to incorporate measures that will encourage people to travel using non-car modes to access home, school, employment, services and facilities.
- SCLP8.1 Community Facilities and Assets: Proposals for new community facilities and assets will be supported if the proposal meets the needs of the local community, is of a proportionate scale, well related to the settlement which it serves and would not adversely affect existing facilities that are easily accessible and available to the local community.
- SCLP8.2 Open Space: New residential development will be expected to contribute to the provision of open space and recreational facilities in order to benefit community health, well-being and green infrastructure.
- SCLP9.2 Sustainable Construction: All new developments of more than 10 dwellings should achieve higher energy efficiency standards that result in a 20% reduction in CO2 emissions below the Target CO2 Emission Rate (TER) set out in the Building Regulations. All new residential development in the plan area should achieve the optional technical standard in terms of water efficiency of 110 litres/person/day. All new non-residential developments of equal or greater than 1,000sqm gross floorspace are required to achieve the British Research Establishment Environmental Assessment Method 'Very Good' standard or equivalent unless it can be demonstrated that it is not viable or feasible to do so.

- SCLP9.5 Flood Risk: Proposals for new development, or the intensification of existing development, will not be permitted in areas at high risk from flooding, i.e. Flood Zones 2 and 3, unless the applicant has satisfied the safety requirements in the Flood Risk National Planning Policy Guidance (and any successor). These include the 'sequential test'; where needed the 'exception test' and also a site-specific flood risk assessment.
- SCLP9.6 Sustainable Drainage Systems: Developments of 10 dwellings or more, or non-residential development with upwards of 1,000 sq. m of floorspace or on sites of 1 hectare or more, will be required to utilise sustainable drainage systems, unless demonstrated to be inappropriate. Runoff rates from new development must be restricted to greenfield runoff rates wherever possible.
- SCLP9.7 Holistic Water Management: All development will be expected to demonstrate that water can be made available to support the development and that adequate foul water treatment and disposal already exists or can be provided in time to serve the development.
- SCLP10.1 Biodiversity and Geodiversity: Development will be supported where it can be demonstrated that it maintains, restores or enhances the existing green infrastructure network and positively contributes towards biodiversity and/or geodiversity. New development should provide environmental net gains in terms of both green infrastructure and biodiversity.
- SCLP10.2 Visitor Management of European Sites: The Council has a duty to ensure that development proposals will not result in an increase in activity likely to have a significant effect upon sites designated as being of international importance for their nature conservation interest.
- SCLP10.3 Environmental Quality: Development proposals will be expected to protect the quality of the environment and to minimise and, where possible, reduce all forms of pollution and contamination.
- SCLP10.4 Landscape Character: Proposals for development should be informed by, and sympathetic to, the special qualities and features as described in the Suffolk Coastal Landscape Character Assessment (2018), the Settlement Sensitivity Assessment (2018), or successor and updated landscape evidence.
- SCLP10.5 Settlement Coalescence: Development of undeveloped land and intensification of developed land between settlements will only be permitted where it does not lead to the coalescence of settlements through a reduction in openness and space or the creation of urbanising effects between settlements.
- SCLP11.1 Design Quality: The Council will support locally distinctive and high-quality design that clearly demonstrates an understanding of the key features of local character and seeks to enhance these features through innovative and creative means. All major residential development proposals will be expected to perform positively when assessed against Building for Life 12 guidelines. Developments should seek to avoid red outcomes unless there are exceptional circumstances.
- SCLP11.2 Residential Amenity: Development will provide for adequate living conditions for future occupiers and will not cause an unacceptable loss of amenity for existing or future occupiers of development in the vicinity.
- SCLP11.3 Historic Environment: All development proposals which have the potential to impact on heritage assets or their settings should be supported by a Heritage Impact Assessment and/or an Archaeological Assessment prepared by an individual with relevant expertise.

- SCLP11.4 Listed Buildings: Proposals to alter, extend or change the use of a listed building (including curtilage listed structures) or development affecting its setting will be supported subject to the criteria set out in this policy.
- SCLP11.6 Non-Designated Heritage Assets: Proposals for the re-use of Non-Designated Heritage Assets which are buildings or structures will be supported if compatible with the elements of the fabric and setting of the building or structure which contribute to its significance.
- SCLP11.7 Archaeology: An archaeological assessment proportionate to the potential and significance of remains must be included with any planning application affecting areas of known or suspected archaeological importance to ensure that provision is made for the preservation of important archaeological remains.
- SCLP12.64 Land off Howlett Way, Trimley St Martin: Land at Howlett Way, as shown on the Policies Map, is identified for the development of approximately 360 dwellings with onsite open space – see policy criteria in Figure 6 above.

National Planning Policy Framework

- 4.12 The National Planning Policy Framework (February 2019 - hereafter “NPPF”) sets out the Government’s planning policies for England. It identifies the Government’s vision, objectives and goals for the planning system and provides a series of aids in the determination of planning applications.
- 4.13 Paragraph 8 of the NPPF advises that the purpose of the planning system is to contribute to the achievement of sustainable development. There are three overarching objectives involved in achieving this as set out in Paragraph 8 of the Framework. These are the economic, social and environmental objectives which are interdependent and need to be pursued in mutually supportive ways.
- 4.14 Paragraph 10 advises that at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development, with 11(c) advising that for decision-taking this means “*approving development proposals that accord with an up-to-date development plan without delay*”.
- 4.15 Paragraph 12 states that the NPPF does not affect the statutory status of the Development Plan as the starting point for decision making and developments which accord with an “*up-to-date*” Local Plan should be approved whilst those that conflict should be refused “*unless other material considerations indicate otherwise*”.
- 4.16 In paragraph 48, the NPPF states the Council may give weight to relevant policies in an emerging plan according to its stage of preparation, the extent of unresolved objections and the degree of consistency of relevant policies with the NPPF.
- 4.17 Section 9 of the NPPF seeks the promotion of sustainable transport with Paragraph 103 advising that “*significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.*” Paragraph 111 states that a Transport Assessment must accompany development likely to generate significant amounts of movement.

- 4.18 Paragraph 122 seeks development of appropriate densities. Proposals should be supported that make efficient use of land taking into account:
- *“a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*
 - *b) local market conditions and viability;*
 - *c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
 - *d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
 - *e) the importance of securing well-designed, attractive and healthy places.”*
- 4.19 Section 12 of the NPPF requires good design with Paragraph 124 stating *‘the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities’.*
- 4.20 Paragraph 131 states *“In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”*
- 4.21 Section 14 of the NPPF sets out the need to consider climate change and flood risk when developing proposals. Section 15 relates to conserving and enhancing the natural environment and section 16 is focused on the conservation and enhancement of the historic environment.

5.0 Pre-Application Engagement

- 5.1 Extensive engagement with the Council, Suffolk County Council (SCC), Trimley St Martin and Trimley St Mary Parish Councils and local residents has been undertaken throughout the development of these proposals over the last two and a half years. Full details of this and the responses provided by the applicant are provided in the Statement of Community Involvement submitted with the application, prepared by the stakeholder engagement consultant appointed by the College, Meeting Place Communications. A summary is provided below.
- 5.2 Two pre-application meetings were held with the then Suffolk Coastal District in preparing this application. The first was on 24th May 2018 and was attended by Liz Beighton and Robert Scrimgeour of the then Suffolk Coastal District Council; Tim Collins, Sam Metson, Ryan Nicholls and Chris Surfleet of Bidwells and Steve Hutchinson, Annabel Lait and Snigdha Deshpande of Saunders Architects. As an allocated site, the principle of residential development was supported subject to the criteria in Policy FPP7 of the FPAAP. The Council were largely supportive of the scheme as shown in the Urban Armature Plan and the Draft Capacity Study, shown in the below extract.



Figure 5: Extract from drawing 7845 SK01 Draft Capacity Study

- 5.3 The following positive comments were made:
- Access is to be taken from Howlett Way and this was acceptable to the Council subject to endorsement from the Highway Authority;

- Pedestrian permeability was encouraged, with two pedestrian links included in the proposals connecting to the PRow along the boundary of the site;
- The layout of properties fronting Howlett Way, to positively address the road and create a gateway to the Trimley villages from the A14 was welcomed;
- The open spaces in the scheme are positive inclusions, but they should be apportioned a use;
- The southern open space is appropriately located and sized to offer relief to properties facing east and offer physical separation to the two adjacent churches and seven oaks; and
- The intention to provide a design brief for the site, to ensure a high-quality and bespoke design in a subsequent detailed application, was welcomed.

5.4 The Council highlighted some aspects of the proposals that required further consideration as the design evolved:

- Treatment of the boundary shared with the PRow should retain its rural feel, with properties fronting the PRow in the interests of safety and surveillance;
- Setting and views from Trimley Old Rectory would be impacted and it is recommended this section of the layout is revisited to provide greater spacing and separation to this property; and
- The location of the Early Years Setting was questioned, due to its distance from the access.

5.5 The College’s intention to consult with Trimley St Martin and Trimley St Mary Parish Councils and the public prior to a second pre-application meeting with the Council was also welcomed, to ensure that all views were considered, and a more detailed discussion can take place over a finalised scheme. The extract below shows the Draft Capacity Study as proposed at the time of the consultation events with the Parish Councils. This drawing was tabled at both meetings and used to facilitate discussions, whilst making the councillors aware that the scheme as shown was continually emerging in light of technical evidence and community consultation.



Figure 6: Extract from drawing 7845_SK513 rev B Draft Capacity Study

- 5.6 A meeting with Trimley St Martin Parish Councillor Harding took place on 19th June 2018, attended by Tim Collins of Bidwells and Daniel Hayman of Meeting Place Communications. The following comments were made:
- The Parish Council, and indeed the public, were under the impression that a primary school would be delivered on this site;
 - Landscaping proposals should be included for the island opposite 270 High Road which is used for informal and unpermitted car parking;
 - Councillors requested some land within the development for play space equipment, as there is a shortage across the Parish;
 - Roundabout at Howlett Way and High Road needs a safety review, particularly from a cyclist's perspective;
 - Two additional pedestrian refuge crossings were requested on Howlett Way; and
 - Discussion with SCC was suggested to address speed reduction on Howlett Way
- 5.7 On 4th July 2018, a meeting was held with Trimley St Mary Parish Council attended by Ryan Nicholls of Bidwells and Daniel Hayman of Meeting Place Communications. The Parish Council raised the following points:
- Parish Council were pleased to see a link from the site onto Church Lane, but requested discussion with SCC for a pedestrian crossing, preferably signalised, across High Road from Church Lane;
 - Pedestrian access on Church Lane needs to be carefully considered to make it safe, as there is a lack of footpaths there now;
 - Parish Council raised the lack of village parking and suggested the open space proposed to the south near the heritage cluster instead be used as a car park. If this land could not be used, they asked if the land around the churches could be purchased and used instead;
 - Parish Council were under the impression that a primary school would be delivered on site after discussions with SCC officers some years ago;
 - Councillors requested that Howlett Way be the only access to the site for construction traffic and that the construction management plan specify that no associated traffic should travel along High Road;
 - Requested discussions with SCC regarding the reduction of the speed limit on Howlett Way; and
 - There is a real need for additional nursery spaces, with existing facilities at capacity and the Parish Council asked if the proposed Early Years Setting would be sufficient to meet need.
- 5.8 A public exhibition was held by the College's consultant team on 17 July 2018. Invitations were sent to 1,516 homes in the vicinity of the site and local political representative were notified by letter. 103 residents attended the exhibition and 70 feedback forms were completed. The issues were raised in the comments given were:
- Capacity of infrastructure and local services;
 - Density of development proposed;
 - Traffic and roads; and
 - Concern about the loss of character of the Trimley villages.



Figure 8: Public exhibition of proposals attended by 103 local residents in July 2018

- 5.9 There were also expressions of support for the need for more housing to be provided locally, to meet the needs of first-time buyers, families and the elderly. Various residents also expressed a desire for scale of development fronting Howlett Way not to exceed two or two and a half storeys, to retain a village edge character to development.
- 5.10 The second pre-application meeting was held on 30 July 2019, attended by Natalie Webb, Robert Scrimgeour and Nicholas Newton (East Suffolk Council), Tim Collins, Sam Metson and Ryan Nicholls (Bidwells) and Steve Hutchinson (Saunders Architects). The main points raised were as follows:
- Officers noted that there had been some changes to the layout following the earlier pre-application meeting, which included lesser development around The Old Rectory, relocating the early years centre and retention of the Pillbox;
 - Applicants are advised to ensure that any application is mindful of the criteria of the emerging policies (particularly in respect of housing mix and self builds) as the new Local Plan could be at the stages of adoption around the time of determination;
 - Proposals for new housing development will be expected to reflect the mix and type of housing needs identified in the Strategic Housing Market Assessment or other evidence of local needs as supported by the Council;
 - The Council's Housing Team response outlined the provisions for the Affordable Houses based on 360 dwellings being provided, this required 119 affordable dwellings, with proposals for 5 or more units having a tenure mix reflective of the Strategic Housing Market Assessment (with at least 40% 1 or 2 bed properties);
 - Proposals of 10 or more units require at least 50% of the dwellings to meet the requirements for accessible and adaptable dwellings under Part M4(2) of the Building Regulations;
 - Developments of 100 or more dwellings will be expected to provide a minimum of 5% self or custom build properties on site through the provision of serviced plots, ideally being provided early on in the development, in accordance with the requirements of the emerging Local Plan;

- It was agreed that no Design Brief would be submitted upfront, with this requirement being covered by a planning condition attached to the outline permission;
- Comments were provided in respect of the layout, these included requirements for dwelling heights, glimpses through the site to heritage assets where possible, properties along adjacent to the Old Rectory may be better suited to bungalows, retention of the pillbox and surrounding open space providing a central green vista, landscaping should be within open spaces or maintainable land, the need for acoustic fencing/glazing in relation to the A14 to remains to be confirmed;
- Comments were provided in respect of ecology and biodiversity, these included a requirement for the application to be accompanied by information to inform a Habitats Regulations Assessment (HRA) with the development providing adequate onsite recreational greenspace with links to circular walks on PRoW. These should take users away from designated sites. Improved greenspace provision should be provided. A RAMS contribution will be sought. It must be ensured that any development proposal includes appropriate mitigation measures for impacts on protected and/or UK Priority Species. The development should deliver significant ecological enhancements as part of its design.

5.11 Other changes have been made to the emerging scheme to respond to comments made during pre-application engagement as follows:

- The scale of development fronting Howlett Way has been reduced from predominantly three storeys to two to two-and-a-half storeys, to provide a less prominent, softer frontage to the development that will support a village edge character to development;
- A pedestrian crossing has been added on the Trimley High Road between The Mariners Public House and St Martin's Church, close to the end of Church Lane;
- A pedestrian refuge has been proposed on Howlett Way close to its junction with the A14 roundabout, to allow for safer crossing of pedestrians using the existing right of way;
- Improved pedestrian crossing facilities have been proposed as part of minor amendments proposed to the junction of Trimley High Road and Howlett Way;
- Development has been set back further from Church Lane and the new village green enlarged to provide a more sympathetic setting for Trimley Old Rectory;
- Play and 'trim-trail' equipment has been built into the landscaping proposal for the scheme on the perimeter of the site, to provide recreational opportunities and encourage active lifestyles for new and existing residents of all ages.

5.12 The design of the access to the scheme, via a roundabout in Howlett Way, has been designed specifically to reduce the speed of traffic entering the Trimley villages from the A14 in response to the concerns raised about speeds on Howlett Way. The College will be committing to substantial contributions towards the Council's Community Infrastructure Levy and will be guided on requirements for other contributions via planning obligations by the Local Planning Authority and relevant consultees, subject to negotiation. Neither the adopted nor emerging Local Plans anticipate the delivery of a primary school on this site. The emerging Local Plan allocates land for a mixed-use development including a new primary school to the south of the High Road, behind Reeve Lodge (policy SCLP12.66).

Church Lane Car Park

- 5.13 During stakeholder consultation, a request was received from Councillor David Southgate, Chairman of the Trimley St Mary Parish Council, to explore the potential of incorporating a car park on the south-west of the development site to address the issue of a lack of public parking in Trimley St Mary. Councillor Southgate cited the issues with parking that typically arise when events are held at the Welcome Hall, St Martins Church, and the Two Sisters Arts Centre combined with parking for the McColls shop and the Mariners public house.
- 5.14 Trinity College Cambridge recognises the pre-existing issue of public car parking provision in the Trimley villages and is willing and keen to work collaboratively with local stakeholders and landowners to try to identify an appropriate solution. Sketched proposals for the car park were therefore developed to enable discussion and consultation with local stakeholders to take place.
- 5.15 The scheme was located on the south-west of the Land off Howlett Way development site, on land previously identified as open space within the illustrative development scheme. The car park would be accessed via Church Lane to the south of the site, with bollards preventing vehicular access to the rest of the development site, except for emergency vehicles. The car park would deliver 11 parking spaces and would be constructed of reinforced grass with a gravel access road. The extract below shows the sketched proposals tabled for discussion with stakeholders in December 2019.



Figure 9: Extract of sketch of potential Church Lane car park proposals the subject of focused consultation (not submitted as part of this application)

- 5.16 Pre-application discussions with Planning and Highway Officers at East Suffolk Council and Suffolk County Council raised concerns about the effectiveness of a car park in this location, taking account of its distance from the shop, public house and other facilities on the High Road but did not outright object. They also raised some safety concerns regarding vehicles using Church Lane.
- 5.17 These concerns have been reflected in meetings held with other stakeholders during a targeted additional consultation held before submission of the application. This included near neighbours of the site, Trimley St Martin Parish Council and the operators of the local facilities. Further points were raised during this consultation regarding the potential obstruction to emergency vehicles trying to access the wider development site from Church Lane and the ecological impact of affecting the hedgerow on Church Lane. The Statement of Community Involvement accompanying the planning application explains this consultation in more detail.
- 5.18 It is noted that Councillor Southgate and other Trimley St Mary councillors remain of the view that the car park on Church Lane should be pursued. However, the overwhelming response from the consultation exercise was that the proposals would not be effective at solving the problem and would give rise to traffic and safety concerns among other issues. The decision has therefore been taken to remove the Church Lane car park from the proposals. Trinity College Cambridge will continue to discuss this issue with the community, local businesses and councillors of both Trimley St Martin and Trimley St Mary Parish Councils to seek to identify an alternative, more effective solution that can obtain more local support.

6.0 Development Proposals

- 6.1 The application seeks outline approval for the construction of up to 340 dwellings, open space, a new Early Years Facility, a new roundabout access from Howlett Way, a foul water pumping station and associated landscaping with all matters reserved except access.
- 6.2 Details of the layout, scale and appearance of the development and its associated landscaping are not submitted for approval at this stage and will only be agreed in full with the Council via a later 'reserved matters' planning application. Nevertheless, a significant level of detail is provided with the application to provide a strong foundation for the subsequent stages of detailed design work.
- 6.3 An Illustrative Site Layout (drawing 7845/P101) is submitted with the application, supported by the Design and Access Statement, to show how the site could be developed taking account of its constraints, planning policy requirements and feedback provided by the Council, relevant consultees and local stakeholders. This shows a scheme comprising 323 dwellings set within a landscaped environment which seeks to provide a high-quality and sustainable living environment which is sensitive to the village edge character of the site's location and the setting of nearby heritage buildings. The proposed development also aims to make a positive contribution to enhancing the character of the area.



Figure 10: Extract from drawing 7845/P101 Illustrative Site Layout

- 6.4 Full details of the access arrangements from Howlett Way are submitted for approval and are shown on drawing 67006-TA-002 Rev D within the Drawings Appendix of the accompanying

Transport Assessment, with a new roundabout providing vehicular access. Further drawings 67006-TA-003, 67006-TA-004 Rev B and 67006-TA-005 Rev B show the other proposed highway and pedestrian crossing improvements that have been proposed in response to community consultation, as described in the previous section.

7.0 Planning Assessment

- 7.1 The application is submitted in response to the allocation of the site in the adopted and emerging replacement Local Plans to deliver on the Council's long-term planning strategy for the Felixstowe peninsula. As explained in the accompanying Design and Access Statement and in more detail elsewhere in this Statement, it delivers on the requirements of the allocation of the site and addresses the Council's policy criteria by:
- Taking primary vehicular access is taken from Howlett Way. Emergency vehicular access only is proposed from Church Lane, in case the single access from Howlett Way ever gets blocked and ambulances or fire trucks need to access the site;
 - Providing extensive links to the public rights of way network;
 - Retaining existing trees and hedgerows to maintain the character of the area and the biodiversity interest of the site;
 - Proposing Affordable Housing in line with policy DM2 of the adopted Local Plan and SCLP5.10 of the emerging Local Plan;
 - Proposing a range of house types and tenures, including 5% self-build plots;
 - Providing for a new on-site early-years centre and contributions towards local primary schools;
 - Taking a sympathetic approach to development in the vicinity of the Old Rectory; and
 - Submitting a site-specific Flood Risk Assessment and Air Quality Assessment alongside the application and ensuring there is adequate drainage capacity to support the development.
- 7.2 The following sections sets out in more detail why the application should be granted planning permission, demonstrating how the proposals have been developed in accordance with planning policy to deliver sustainable development with social, environmental and economic benefits.

Social

Delivering a wide choice of high-quality homes

- 7.3 The Council has confirmed that the site is suitable for the delivery of housing development and accepted this in principle through the allocation of the site in the FPAAP and the emerging Local Plan. The development of the site would represent evolutionary growth of Felixstowe, Walton and the Trimleys, in accordance with emerging Local Plan Policy SCLP3.1 and help deliver the Council's long-term planning strategy for the Felixstowe Peninsula.
- 7.4 The proposed development would provide up to 340 new homes suitable for first time buyers, families and the elderly, and will make a substantial contribution towards addressing the acute local housing needs. Although this is less than the approximate quantum of development proposed by the Local Plan allocation, the Design and Access Statement demonstrates that it is the maximum that can realistically be achieved on this site, taking account of its constraints, whilst still delivery high-quality design. The scheme is deliverable and will make a major contribution towards the Council's five-year housing land supply. Indeed, the Council's emerging Local Plan Housing Land trajectory anticipates the delivery of the site between 2021/22 to 2027/28.

7.5 Whilst the precise housing mix is not being set in detail as part of this application, it provides more detail than would normally be expected for an outline application. Taking account of Policies SCLP5.8, SCLP5.9, SCLP5.10, pre-application advice and the latest evidence of need as set out in the Strategic Housing Market Assessment² (hereafter “SHMA”), the proposed mix comprises a suitable choice of homes to meet local demand. The proposed mix was informally shared with the Council for discussion prior to the submission of the application, and the Council confirmed the mix appeared appropriate at this stage of the planning process.

7.6 The scheme anticipates the delivery 33% of new dwellings as affordable housing and 5% self-build plots in accordance with requirements of the emerging Local Plan, assuming that planning obligation and other development costs do not present viability hurdles.

Good Design

7.7 The illustrative masterplan shown on drawing 7845 SK02 Rev D and described in detail in the Design and Access Statement demonstrates how the development of the site will provide a residential development of the highest quality that will respond to local needs whilst enhancing the character of the area.

7.8 The Design and Access Statement sets out the key aims of illustrative masterplan which are:

- To make a substantial contribution to the supply of new homes in the area to meet local needs, being set within a high-quality landscaped environment that will build a strong sense of place;
- The proposal provides a mix of housing types and tenures suitable for a family context, including the provision of bungalows as lifelong homes and contributing towards local needs for affordable homes;
- To make provision for pedestrian and cycle permeability through the proposal to enhance sustainable credentials and encourage sustainable methods of transport;
- To create active frontages and positively address Howlett Way with the provision of outward facing dwellings. This edge is softened by the retention of the existing tree belt and the inclusion of a green area to ensure that the character is rural in feel and appropriate to its setting;
- To include green open space and play spaces to provide amenity for the local community and to preserve the rural character of the local area;
- To include a main entrance to the site off Howlett Way which provides views into the development towards the central open space;
- To consider the existing public right of way with proposed dwellings overlooking the footpath in order to provide natural surveillance within a landscaped setting;
- To incorporate an Early Years Centre to serve the local community which can be easily accessed by foot and car;

² Ipswich and Waveney Housing Market Area Strategic Housing Market Assessment Part 2 Partial Update (January 2019) Tables 4.4f and 4.5f

- To propose a high quality, well designed development which is sympathetic to the character and heritage of the existing setting;
- Provides a hierarchy of pedestrian and vehicular routes throughout the scheme;
- Proposes a mixture of built form to reflect a hierarchy of streets, spaces and character areas; and
- Provides public open space and play areas in accordance with emerging Local Plan Policies SCLP12.64 and SCLP8.2.

7.9 The information presented in the Design and Access Statement demonstrates how the scheme has evolved in response to the extensive schedule of stakeholder engagement undertaken to inform these proposals. The quality of the design put forward will ensure that the proposed development will become a sustainable, inclusive neighbourhood that will integrate well with the existing environment in Trimley St Martin.

Promoting healthy communities

7.10 The indicative design of the scheme seeks to provide an environment which would support healthy living, comprising a network of open spaces linked with the existing surrounding Public Rights of Way (hereafter “PRoW”) network. The peripheries of the site incorporate play areas for children and ‘trim-trail’ equipment for use by people of all ages, including the elderly. It will also provide a high quality, well planned environment for residents including a recreational area, open space, play equipment and landscaping which will have a positive impact on new and existing residents’ health and well-being.

7.11 The site is located in close proximity to primary and secondary education facilities and local healthcare services and financial contributions for enhancements towards these facilities may be requested by statutory consultees during the application determination period. The proposed development will be subject to a CIL charge of £64.48 per square metre of new open-market residential floorspace developed³. Funds secured through CIL can be used towards local education, health and other social infrastructure provision to take account of the impacts of the development, in accordance with the Council’s infrastructure spending priorities.

Promoting sustainable transport and access

7.12 The submitted Transport Assessment highlights that development of housing in this location will help to reverse the unsustainable pattern of in-commuting to Felixstowe, Walton and the Trimleys. It concludes that the site is located in an exceptionally accessible and sustainable location which makes it well suited to residential development.

7.13 Howlett Way and High Road are both bus routes and there are bus stops on both roads close to the site and within easy access of the proposed residential development. Trimley railway station is approximately 1,300m from the site and provides train services to Felixstowe and Ipswich. Trimley St Martin and Trimley St Mary provide a number of accessible local facilities including two primary schools, two nurseries, a convenience store and post office, a butcher and two public houses.

³ Based on the 2020 Indexed CIL rate per square metre for the former Suffolk Coastal area.

There are further local facilities in Walton and a wide range of amenity is available in Felixstowe town centre.

- 7.14 It is proposed that a single vehicular access is provided for the site via a new roundabout on Howlett Way. This is in line with the requirements set out in the FPAAP and emerging Local Plan Policy SCLP12.64 for development of the site.
- 7.15 The Transport Assessment has used an industry standard methodology, agreed with the Highways Authority, to assess the likely travel demands and vehicular traffic impacts of the proposed development. Trips on foot, by cycle and by bus can also be easily accommodated on local footways, cycle routes and public transport services.
- 7.16 Average residential vehicle trip rates for the development were agreed with SCC as suitable for the assessment of the development. Nursery trip rates were derived using TRICS data. Development trips were distributed and assigned to the local road network using Census data and the Google Maps journey planner. This indicated that the vast majority of development traffic would likely use the A14.
- 7.17 Assessment of the impact of the development traffic on the local road network indicated that the local junctions would continue to operate well within capacity and the development would have no material adverse impacts. SCC has suggested that the use of Journey to Work data might not reflect journeys made for other reasons and requested that a sensitivity test be made based on an alternative trip assignment method.
- 7.18 An alternative assignment has been derived using the turning movement proportions to and from Goslings Way which provides access to a recently completed residential development. The observed turning movements from Goslings Way at this junction were applied to the calculated traffic flows from the proposed development and a revised assessment of the resultant traffic impact was made using this alternative assignment.
- 7.19 This sensitivity test assessment also showed that the local junctions would continue to operate well within capacity and that there would be no material adverse impacts. The effects of the proposed improvements to the northern arm of the Howlett Way roundabout are very small and would not result in any material impact upon the capacity of the junction.
- 7.20 Additionally, SCC requested that two junctions remote from the development site be assessed in detail. The results of those capacity assessments indicate that the proposed development would have a negligible impact on their operation based on the sensitivity test distributions.
- 7.21 As referenced above, following a request from the Chairman of the Trimley St Mary Parish Council provision has been made for a small number of parking spaces to be accessed from Church Lane without providing access to the development. It is considered that this does not conflict with the requirements of the FPAAP or the emerging Local Plan.
- 7.22 The internal road layout is reserved for later consideration, but the Illustrative Masterplan anticipates that it will be designed in accordance with the principles encouraged by the Manual for Streets, with the aim of raising the status of pedestrians and cyclists and reducing the priority normally given to vehicular traffic.

- 7.23 The Transport Assessment concludes that the proposed development will accord with relevant national and local policies, including the recently published National Planning Policy Framework. It will not result in a severe level of highway impact and there are no highways reasons why the development should not be permitted.

Economic

Building a strong and competitive economy

- 7.24 The proposed development would give rise to a number of economic benefits both during the construction phase and following its completion. It will provide work for trades people, apprentices and labourers during the construction and ongoing business for property maintenance firms thereafter.
- 7.25 It is recognised that Felixstowe has an aging population and as a consequence the economic benefits of new homes are likely to be particularly important. They will encourage young families to move into the area and create options for downsizing, freeing up family homes for economically active residents. The adopted Core Strategy recognises that the growth of jobs in the area, driven by expansion of the Port of Felixstowe, means that employment is now out of balance with the availability of housing. More housing development is important to the future of the Port because it will provide a greater working age local population and reduce in-commuting from other areas.

Environmental

Conserving and enhancing the historic environment

Archaeology

- 7.26 Archaeological evaluation in the form of geophysical survey and trial trenching has been carried out across the site, agreed with the County Archaeological Service. This is submitted to accompany this planning application in order to understand the archaeological potential of the site.
- 7.27 The earliest activity identified was late Neolithic/early Bronze Age flint working and use. The main area of archaeological interest is located in the southwest corner of the site, where four pits dating to the late Iron Age were revealed in one trench. Other Iron Age archaeology was dispersed across the site, however there is no evidence of Roman or Saxon archaeology. The archaeology identified is of local interest and preservation in situ is not a requirement. It has been advised that prior to any development taking place, a programme of targeted archaeological excavation would be undertaken by professional archaeologists.
- 7.28 Having regard to the baseline conditions, the nature of the proposed development and the proposed measures that would be effective in mitigating the impacts of the scheme, there would be no residual effects upon known archaeological assets. The proposed development therefore fully accords with both local and national cultural heritage policy.

Heritage

- 7.29 It has been found that there will be no direct physical impacts on heritage assets as a result of the proposed development. Twelve designated heritage assets and one non-designated asset and the Trimley Old Rectory have been assessed in terms of the potential impact of the proposed development on their significance and setting.
- 7.30 Following the identification of assets and assessment of their settings, the illustrative masterplan scheme has evolved to ensure that due regard is paid to these considerations and the provisions of Section 66 of the Planning (Listed Buildings & Conservation Areas) Act 1990, Paragraphs 193-197 of the National Planning Policy Framework and local policies relating to impacts on designated and non-designated heritage assets.
- 7.31 As a result of the initial appraisals made, it was identified that there was a requirement to ensure that the proposals carefully considered the impact of the proposed development on the settings of the Grade II-listed churches of St Martin and St Mary, the Grade II listed Old Rectory, Church Farmhouse and 204 High Road, and the non-designated pill box.
- 7.32 Open space and retained hedgerows are proposed adjacent to Church Lane to maintain its enclosed 'rural' character as it runs along the north side of the churchyard. The size and orientation of the space being created matches the size of a former field shown on 19th Century Ordnance Survey plans. The degree of physical separation provided by this greenspace will assist in mitigating the impact on the setting of the churches and other listed buildings in High Road.
- 7.33 An assessment has also been made of the extent to which the church towers may be regarded as representing landmarks across the wider area - including parts of the application site. The illustrative masterplan has been developed to ensure that there are opportunities for incidental views towards the towers from within the site. These are not formalised as vistas (as this would impose an artificial structure to the masterplan), but they are designed to occur from within the greenspaces and streets – much in the same way as views of the towers are currently experienced from within the village.
- 7.34 The illustrative masterplan has been developed around the pill box located in the centre of the site to ensure that it can remain as a prominent feature. The intention is to retain and repair the existing structure, and to provide it with interpretation, as part of a grouping of open space at the centre of the new community. In terms of the NPPF policy which applies to 'non-designated heritage assets' such as this, the proposed response provides a suitable recognition of its historic interest and enables it to contribute positively to the identity of the proposed development.
- 7.35 As a result of the above approach to assessment and design, it is considered that special regard has been paid to the desirability of preserving the setting of the listed buildings, in accordance with Section 66 of the Planning (Listed Buildings & Conservation Areas) Act 1990. In addition, the significance of the non-designated heritage assets has been taken into account within the design of the scheme, to the satisfaction of NPPF paragraph 197. The Heritage Statement confirms the proposals would result in a lower level of less than substantial harm. It is also considered that the development would result in an overall beneficial impact on the pill box non-designated heritage asset. The public benefits of bringing the site forward in accordance with the Local Plan's allocation substantially outweigh the minimal harm that will arise to the setting of the heritage assets.

Conserving and enhancing the natural environment

Biodiversity

- 7.36 The ecological interest of the site has been thoroughly assessed by Aspect Ecology and the scheme has been designed to ensure that its potential to support protected or priority species is maintained and enhanced. A desktop study, habitat and general faunal surveys, along with Phase 2 survey work has been undertaken at the site.
- 7.37 The assessment found that the site is dominated by arable land, along with areas of semi-improved grassland, amenity planting, tall ruderal vegetation, scrub, ditches, bare ground and two buildings, none of which are considered to form important ecological features. Habitats of elevated value are present in the form of hedgerows, semi-mature/mature trees and tree lines, as well as the offsite woodland to the east which is considered likely to be a Priority Habitat Deciduous Woodland.
- 7.38 The habitats within the site provide opportunities for foraging and commuting bats and birds in the form of wooded habitats which are largely restricted to the site boundaries, whilst areas of long sward grassland and tall ruderal habitat provide minor opportunities for reptile species. Indeed, reptile survey work undertaken at the site in 2018 recorded a low population of Common Lizard within the site. In addition, five trees within the site have been assessed as being of value to roosting bats. The value of such areas is limited by the sites isolation by surrounding roads, existing residential development and intensively managed arable land.
- 7.39 In terms of ecological designations, a number of designations are present within the local area, including Stour and Orwell Estuaries Special Protection Area (SPA) and Ramsar, located approximately 1.6km from the site. The habitats of ecological value within the site are largely restricted to the site boundaries. It is therefore anticipated that these features can be accommodated as part of the development scheme. Notably, retained habitats around the margins of the site will ensure continued opportunities for reptiles at the site, as well as providing connectivity to the wider landscape.
- 7.40 The proposal will seek to mitigate for effects on European-level designations (including Stour and Orwell SPA/Ramsar), in line with guidance from East Suffolk (formerly Suffolk Coastal District) Council and Natural England. In addition, the proposals present the opportunity to secure a number of net gains for biodiversity, including provision of native planting, provision of areas of wildflower grassland, cut-outs in garden fences for Hedgehog, and specific faunal boxes/features for a range of species groups, including bats and birds.
- 7.41 The masterplan seeks to retain the majority of features of greatest ecological value in the site in the form of semi-mature/mature trees, hedgerows and tree lines, as well as the offsite wooded belt to the east of the site. The site's hedgerows and tree lines will be enhanced through supplementary infill planting of native species, which will strengthen these features and enhance their value as wildlife corridors for faunal species, including bats, badgers and birds.
- 7.42 New habitats of ecological value will also be created within areas of open greenspace in the site, in the form of areas of wildflower grassland and native tree/shrub planting (including provision of fruit-bearing species), whilst the opportunity exists to incorporate ecological enhancements into the

proposed SuDS basins (where these do not interfere with their primary drainage function). The creation of these habitats will support the existing habitats present and further strengthen the green corridors around the site, as well as providing additional foraging, sheltering and nesting opportunities for a range of faunal species, including bats, badgers, birds and amphibians.

- 7.43 Specific faunal enhancements will also be provided both within areas of greenspace and within the built development, in the form of bat boxes, bird boxes, invertebrate boxes and creation of log piles of value to amphibians, reptiles and invertebrates.
- 7.44 In the long term, both new and existing habitats will also be subject to ecologically sensitive management to ensure continued opportunities are available within the site for faunal species. In addition, an ecologically sensitive lighting scheme will be designed for the site to minimise light spill on existing and newly created green infrastructure, as well as bat/bird boxes, thereby ensuring continued opportunities are also available for nocturnal species, such as bats and Badger.
- 7.45 To reduce recreational pressures on the European designated sites, it is proposed to include a fenced dog walking area with dog waste bins and information boards promoting the use of the local footpath network. Leaflets can also be provided to new homeowners promoting the use of the local footpath network for recreation, rather than the designated sites.
- 7.46 As such, following the implementation of the above measures which have sought to minimise impacts and seek to implement appropriate avoidance, mitigation and compensation measures where necessary, it is considered unlikely that the proposal will result in significant harm to biodiversity, and will present significant opportunities for biodiversity net gains.

Trees

- 7.47 A survey of all arboricultural features on and affecting the site was carried out by Hayden's Arboricultural Consultants and the findings used to inform the masterplan. The survey data has been produced in accordance with recommendations set out in BS 5837: 2012. A combined Arboricultural Impact Assessment, Preliminary Arboricultural Method Statement and Tree Protection Plan report (hereafter "the report") accompanies this application.
- 7.48 As the site is currently arable farmland, the majority of the arboricultural features are confined to the boundaries. The tree survey identified 21 individual trees, 5 tree groups, 9 areas of trees, 9 hedgerows and 1 woodland.
- 7.49 These trees and hedges are of varying quality, conditions and amenity value. A number are assessed as having sufficient potential (either individually or collectively) to contribute positively to a residential development. The report sets out arboricultural works to existing features including the removal of specimens, for health and safety, cultural or quality of life reasons irrespective of development. In order to facilitate the development, 5 trees and sections of 3 tree are proposed for removal, 3 of which are British Standard category B and 5 are category C.
- 7.50 The illustrative masterplan demonstrates a design solution that would retain the majority of trees and hedgerows. New tree planting is proposed to mitigate necessary losses and enhance the design quality, visual amenity and biodiversity value of the proposed development. Illustrative proposals are submitted now, and the precise details will be confirmed at a later stage of the planning process. Given the relatively open nature of the site, there could also be scope to greatly

enhance the canopy at this location through the planting of new trees with the aim of increasing species and age diversity. As such, it should be possible for the arboricultural elements to successfully aid and enhance a sustainable design which meets the requirements of local planning policy.

- 7.51 The site has relatively few arboricultural constraints and development offers considerable scope to plant new trees. Existing vegetation predominantly lies on or close to the boundaries. There are no arboricultural constraints that can be reasonably cited to preclude development. The proposed design has taken into consideration the constraints of the existing trees and has sought to incorporate them as an integral feature of the scheme. The development of the site offers the opportunity for landscape and arboricultural improvements to come forward that may not otherwise be realised.

Landscape and visual impact

- 7.52 A Landscape and Visual Impact Appraisal (LVIA) has been undertaken by Terra Firma to evaluate potential effects of the proposed development on the character of the landscape and on visual amenity in order to inform the design process, reduce or mitigate adverse effects and incorporate enhancements where possible.

- 7.53 Key considerations for this assessment have been identified as follows:

- The character of the site and wider landscape needs to be understood and respected. The Suffolk County Landscape Character Assessment will be taken into account and a more detailed local landscape character assessment will be carried out;
- The Suffolk Coast and Heaths AONB lies some 0.5km south-west of the site but there is no intervisibility with the site as existing nor is there likely to be when developed as proposed;
- Two public rights of way run along the boundaries of the site and their setting needs to be sensitive treated and impacts on views minimised;
- The site is visible from adjacent residences and public highways;
- There are existing views from within the site towards the two churches of Trimley St Mary and Trimley St Martin and the design should aim to incorporate these into the layout;
- The Churches also sit within a number of historic buildings (some listed) and the setting of these properties should be considered in the design;
- A preliminary acoustic assessment has highlighted that a number of areas suffer from high levels of noise in certain areas, mainly to the northern boundary on Howlett Way and near the junction of the A14 slip road;
- An existing World War 2 pillbox sits within the centre of the site and should be incorporated into the design (possibly with ecological benefits). Although this is not a listed structure, it is of local importance and is highlighted in the Felixstowe AAP Policy FPP7;
- The area identified as the former poultry farm has been highlighted as a potential site for future development by the owner and this should be considered to allow cohesive design across both sites; and
- Howlett Way is a key gateway into the village.

- 7.54 The LVIA has evaluated the landscape character and the extent of the views from the surrounding area into the site. Partly due to the strong enclosure provided by existing development, surrounding

roads and other physical features, the report concludes that the only effect of the development on the character of the wider landscape will be the change of use of the site from agricultural to residential, which is unavoidable given the allocation of the site for development in the adopted and emerging Local Plans.

- 7.55 Visually the development will have a larger impact on the viewpoints and private properties closest to the site, however the boundary screening and new planting proposed will assist in screening the development. As this new vegetation matures, the impact will be reduced.
- 7.56 The illustrative masterplan seeks to reduce adverse landscape impacts as far as is practicable. The scheme will deliver substantial improvements to green infrastructure and publicly accessible open space, including a green gap on the frontage of the site to provide a softer appearance to the frontage of the development on Howlett Way.

Reducing the impacts of noise

- 7.57 A noise and air quality assessment has been undertaken by M.E.C Acoustic Air. The assessment shows that the land immediately adjacent to Howlett Way falls within the category of High risk during both the day and night, for which the guidance is "*High noise levels indicate that there is an increased risk that development may be refused on noise grounds. This risk may be reduced by following a good acoustic design process that is demonstrated in a detailed ADS. Applicants are strongly advised to seek expert advice.*" The lower noise levels across the remainder of the site represents a low noise risk.
- 7.58 In order to mitigate the high risk, a higher acoustic design specification will be necessary. Windows facing Howlett Way will need to provide a minimum sound reduction (RTRA) of no more than 31 dB RTRA in order to achieve BS8233's internal LAeq and LAm_{ax} noise levels. Data for the sound insulation performance of different window configurations indicates that an appropriate window design capable of providing a sound reduction of 31 dB would be 6/12/7 in acoustic laminate, where the information is presented in terms of the thickness of one pane of glass in mm, followed by the size of the air gap, followed by the thickness of the second pane of glass. Window manufacturers will be able to provide certification showing which of their window designs are capable of achieving the required sound reductions.
- 7.59 With regards to the new apartments facing Howlett Way, noise levels at higher floors can typically increase by 1 dB due to contributions coming from a greater angle of exposure. Therefore, for habitable rooms on the upper floors of new apartments facing Howlett Way, a slightly higher window specification is recommended, and a specification such as 10/12/6 would be capable of providing an overall sound reduction of 32 dB RTRA, which would similarly enable all internal noise standards to be met.
- 7.60 Opening windows for ventilation purposes would reduce the insulation provided by the building façade and internal noise levels would then exceed the design standards, although this situation is not unusual for residential areas within the urban environment where transportation noise is prevalent. Passive acoustic ventilators, such as acoustic trickle vents in the window frames or acoustic airbrick type vents within the walls, can be used for habitable rooms that have windows having an unscreened view towards Howlett Way. These would enable occupiers to obtain natural ventilation with windows closed, without any loss of amenity due to noise intrusion.
- 7.61 For acoustic trickle vents in windows providing a sound reduction of 31 dB RTRA, the vent, when open, should be selected to at least provide 43 dB D_{n,e,w}, whereas the equivalent acoustic vent

for windows providing 32 dB should be capable of providing a value of at least 44 dB Dn,e,w when open.

- 7.62 The illustrative masterplan indicates dwelling frontages facing Howlett Way, with private gardens used for amenity purposes located behind and thereby experiencing additional buffer distance from the noise source as well as screening from the dwellings themselves. In this scenario, a conservative attenuation of 10 dB(A) would apply and, together with the additional distance attenuation, would result in an outdoor noise level of approximately 58 dB LAeq for garden areas, which would slightly exceed the BS8233/WHO outdoor criterion of 55 dB. However, this needs to be considered against the expressed caveats, namely that achievement of the WHO guideline values in urban areas would often require drastic action to virtually eliminate road traffic noise and other forms of transportation noise (including public transport) from the vicinity of houses, and that there is no evidence that anything other than a small minority of the population exposed at such noise levels find them to be particularly onerous in the context of their daily lives. The latest guidance from BS8233:2014 is that *“In such a situation, development should be designed to achieve the lowest practicable levels in these external amenity spaces but should not be prohibited.”*
- 7.63 For new dwellings facing the A14 slip road, windows facing the road will need to provide a minimum sound reduction (RTRA) of 15 dB for living rooms and 26 dB for bedrooms in order to achieve BS8233's internal LAeq and LAm_{ax} noise levels. Data for the sound insulation performance of different window configurations indicates that appropriate window designs capable of providing sound reductions of 15 dB and 26 dB are normal thermal double glazing having a configuration of 4/12/4 or 4/16/4 for living rooms and a configuration of 6/12/6 for bedrooms. Acoustic vents would need to provide respective sound reductions of at least 37 dB and 38 dB Dn,e,w when open. With private gardens used for amenity purposes located behind new dwellings, the screened outdoor noise level of approximately 44 dB LAeq for garden areas would satisfy the BS8233/WHO outdoor criterion of 55 dB.
- 7.64 Any residual garden areas having a partial unscreened view to the road should have at least a 1.8m high close-boarded timber fence or equivalent structure along the garden boundary to minimise the noise impacts. This would typically provide an attenuation of 7 dB(A) and would minimise the impact of noise in accordance with the guidance of BS8233.
- 7.65 Dwellings further into the site will experience lower noise levels due to the additional distance attenuation and the screening provided by dwellings located adjacent to Howlett Way and the A14 slip road. As a consequence, acceptable internal noise levels will be achieved using normal thermal double glazing, and the outdoor noise criterion will be met at all locations.
- 7.66 The design specification set out above is considered appropriate to mitigate the noise levels from Howlett Way and the A14. There are no other outstanding noise issues, therefore, the overall conclusion of the assessment is that the proposals are acceptable.

Air Quality

- 7.67 MEC Acoustic Air has also undertaken an Air Quality Assessment for the site, using the atmospheric dispersion modelling package ADMS-Roads Air Quality Management System Version 4.1.1.

- 7.68 The assessment results indicate that annual mean NO₂ and PM₁₀ concentrations are predicted to remain below the annual mean objective at all assessed receptor locations, and that the effects of traffic generated by development would be negligible. Therefore, since the air quality assessment indicates that the annual mean air quality objective will be met at the most exposed receptor locations, and since the actual changes due to traffic generated by development are small and not significant, it can be concluded that the air quality at the proposed site is acceptable for development and development traffic will not lead to significant adverse impact upon existing air quality.

Ground conditions, contamination and geo-environmental constraints

- 7.69 A Desk Based Study was undertaken by Richard Jackson Engineering Consultants for the proposed development site. This assessed the history and environmental setting of the site to establish the risk of contamination and identify any issues relating to ground conditions which would need to be addressed during the construction of the scheme.
- 7.70 The on-site poultry sheds together with off-site infilled former pits were identified as potential sources of contamination. The Study concluded the overall risk from soil and groundwater contamination at the site is considered to be moderate / low. The risk from ground gases is considered high.
- 7.71 It is recommended that intrusive ground investigations are undertaken at the site to confirm the prevailing ground conditions and assess the contamination status of the site. In-situ and geotechnical laboratory testing should be undertaken to confirm the above assumptions. Intrusive investigations should include the installation and subsequent monitoring of standpipes to assess the gassing regime beneath the site. The applicant is willing to accept a condition attached the outline planning permission requiring this work to be completed.

Meeting the challenge of climate change, flooding and coastal change

Flood risk and drainage

- 7.72 Richard Jackson Engineering Consultants has undertaken a Site-Specific Flood Risk Assessment (hereafter "SSFRA") for the site.
- 7.73 The site is located in Flood Risk Zone 1 which is at very low risk from sea / river flooding and is therefore suitable for the proposed development. The site is also not at risk from groundwater flooding, overland surface water flooding or reservoir flooding. The geology of the site has been investigated as being suitable for infiltration drainage and therefore the proposed surface water drainage strategy is to utilise infiltration Sustainable Drainage Systems (SuDS) to provide appropriate pollution control before the water discharges into the ground. This will be facilitated through a combination of permeable paving, swale features and detention basins at key locations to collect and direct surface water run-off.
- 7.74 The required drainage is sized accordingly to meet the Lead Local Flood Authority guidance with consideration to current Climate Change guidance (on rainfall intensity) to ensure that the drainage proposals do not increase or create flood risk to those on site or off-site for the 1.0% annual probability rainfall intensity storm event.

- 7.75 The Flood Risk Assessment demonstrates that the site will remain safe over its lifetime and that surface water run-off can be dealt with adequately to ensure that the risk of flooding elsewhere will not be increased by developing the site.

Foul water drainage

- 7.76 The SSFRA also addresses foul water. Anglian Water records show local foul water sewers in High Road to the west of the site, therefore a pumped foul water drainage strategy for the site is required. This allows the pumped rate to be controlled and also accommodates 24-hour storage of foul water, should it be required, minimising risk to the existing foul water network and to the occupiers of this development should the pumping station fail.

- 7.77 The illustrative layout includes an on-site pumping station in the south-east corner of the site. This pumping station will be adopted by Anglian Water and will pump used water to an existing manhole in High Road by the Howlett Way roundabout.

- 7.78 The FRA concludes that the increased foul drainage requirements arising from the proposal can be dealt with effectively.

Heads of Terms

- 7.79 The following planning obligation heads of terms are considered appropriate for the development, taking account of discussions with the Council and SCC:
- One-third of new housing to be provided as Affordable Housing, subject to confirmation of other planning obligations requests;
 - Highways infrastructure improvements, as set out in the submitted Transport Statement;
 - Provision of land and a financial contribution towards the construction of a new on-site Early Years Centre, detail to be negotiated with Suffolk County Council;
 - Financial contributions for new Primary and Secondary School places, subject to need being identified by Suffolk County Council and detail negotiated between the parties.

8.0 Conclusion

- 8.1 This Planning Statement has been prepared by Bidwells on behalf of Trinity College Cambridge to support an outline planning application with all matters reserved except access for residential development on land off Howlett Way, Trimley St Martin. Trinity College owns the land in its entirety. The submission of this application follows extensive public consultation and detailed pre-application discussions with Officers of East Suffolk Council and relevant consultees.
- 8.2 The application proposals are of strategic importance to the realisation of the objectives and allocations of the Council's adopted Core Strategy, FPAAP and emerging Local Plan. They will make a substantial contribution towards planned housing supply and provide significant areas of newly accessible landscaped open space whilst supporting economic growth and helping to fulfil the role of Felixstowe, Walton and the Trimleys as a major centre for growth in the District. The proposals will enhance the sustainability of the settlement, help redress a population imbalance and support the ongoing prosperity of the Port of Felixstowe.
- 8.3 Critically, the proposed development is consistent with the allocation of the site for development in the adopted FPAAP and emerging Local Plan. The allocation of Land off Howlett Way in the emerging Local Plan now carries significant weight in decision making following the publication of the Inspector's initial findings following the examination hearing sessions and the start of consultation on the Main Modifications to the Plan, none of which propose substantive changes to the proposed allocation of the site. The Inspector concluded that the emerging Local Plan will likely be found sound subject to main modifications and did not raise any significant issues with the site's allocation.
- 8.4 The impacts of the scheme have been assessed in a series of specialist technical supporting studies which demonstrate that the site can be developed to provide well a designed new neighbourhood which takes account of its context and integrates well with the existing character and setting of the area.
- 8.5 The site is located in an exceptionally sustainable location, within walking distance of schools and a wide range of local services, being close to major centres for employment and adjacent to the main public transport corridor connecting Felixstowe, Walton and the Trimleys with each other and the wider area. The pedestrian, cycle and vehicular traffic likely to arise from the scheme can be accommodated by the local networks and is not expected to have an appreciable impact on its operation.
- 8.6 The potential impacts of the scheme are unlikely to raise significant concerns in respect of biodiversity, arboriculture, landscape and visual impact, contamination, air quality, noise, archaeology, built heritage, flood risk or drainage. Indeed, the development of the site has the potential to enable significant benefits for the area in many of these respects.
- 8.7 This Planning Statement has demonstrated that the proposals represent sustainable development, comply with local plan policies and should be approved without delay in accordance with NPPF paragraph 11 without delay.



BIDWELLS