



# Land to the East of Bramford Road, Bramford

## The Proposals

### What is being proposed?

Suffolk County Council (SCC) are proposing to build out their own land to increase the supply of new homes that will contribute towards addressing local and county wide housing shortfalls. SCC also want to use this land to assist with addressing the Climate Emergency declared by the Council.

SCC is seeking outline planning permission for up to 114 dwellings with associated supporting on site infrastructure.

### What is an outline planning application?

The application that will be submitted is an outline planning application; in other words, SCC are seeking approval of the principle of the development of the site for up to 114 dwellings, with access as a detailed matter to also be considered. All other matters, such as the final layout of the houses, their appearance, scale and landscaping, are reserved so they will be considered in a future application, should permission be granted, known as a 'Reserved Matters' application.

As the scheme is submitted in outline, the only formal plans submitted for approval will be a site location plan and the proposed access plan. However, the application will be accompanied by a series of 'Parameter Plans' covering Land Use, Landscaping and Connections.

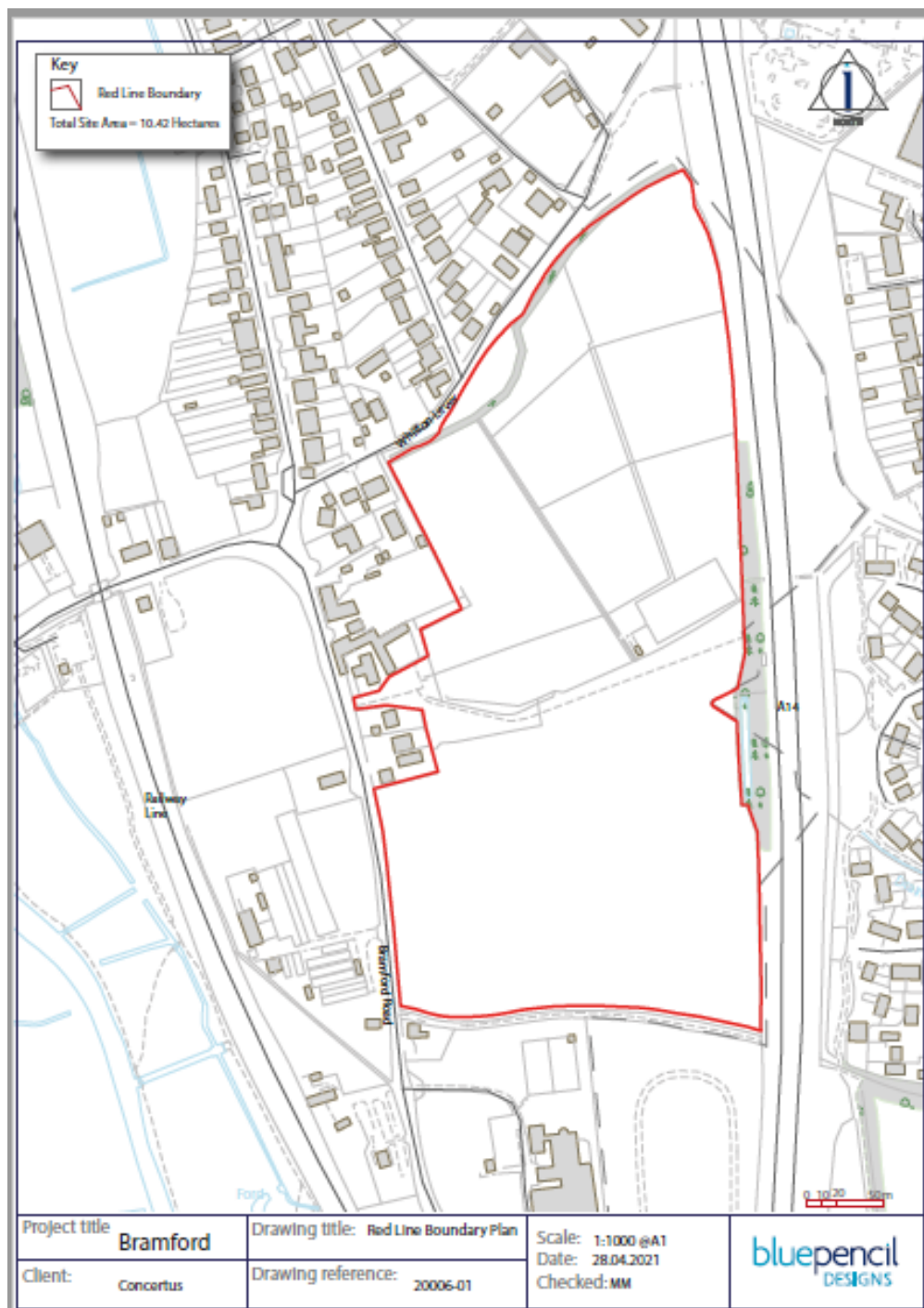
SCC will also submit an illustrative layout to support the application. The illustrative layout and supporting material included within this virtual exhibition indicates a form of development of the site, which conforms to design principles, highway guidance and illustrates each of the 114 homes, with garden and parking provision in accordance with the Council's planning standards. SCC will not seek formal approval of this plan at this stage; it will primarily be submitted to illustrate that the site area is capable of accommodating the number of homes proposed, in a form that will meet parking, garden size, highway and public open space standards and policy requirements.

SCC will also submit a Design and Access Statement which will also provide information relating to how the site will connect to the settlement, the size and types of homes proposed, how the scheme has evolved, the possible design of dwellings and some illustrative street scenes. In addition, it suggests a possible mix of units.



## Where is development proposed?

The site is 10.42ha of agricultural land (outlined in red below) located to the east of Bramford Road, Bramford. It lies adjacent to the existing settlement boundary of the village of Bramford, with the site bound by residential development to the west and south along Bramford Road and on Whitton Leyer to the north, with the A14 to the east.



### How many homes will be provided?

It is proposed that there will be up to 114 homes provided on the site. This will result in a density of development of 10.9 dwellings per hectare. The Council sets out in its policy that although housing developments should achieve densities of 30 dwellings per hectare, lower densities may be justified in villages to take account of the character and appearance of the existing built environment. The density proposed is compatible with the local landscape and built character.

### Will anything else be provided alongside the homes?

Yes, local transport infrastructure in the form of the provision of a pedestrian and cycle highway between Bramford to Ipswich, which will encourage reduced car trips for commuting and leisure. Private land will be opened up for public access with new areas of significant new Public Open Space (POS) for the local community and new residents. The new publicly accessible areas of open space which will include a naturally equipped children's play area. Significant landscaping is to be provided to provide biodiversity net gain for the site.

### Will there be affordable housing?

The proposal will provide policy compliant levels of affordable housing equating to 35% to meet existing needs for those seeking affordable home ownership, which would equate to 30 affordable dwellings.

### How many bedrooms will the houses have?

It is proposed that there will be a mix of housing types, including one, two, three and four bed homes. The exact mix has yet to be formally agreed with the Council but will seek to reflect the needs identified in the Mid Suffolk Strategic Housing Market Assessment.

### Will there be any bungalows?

We are looking at this time to provide 2 bungalows on the site.

### Will there be an opportunity to prioritise these homes for local people?

SCC are working with the District Council to explore opportunities to secure priority for local people. The Government's First Homes may present an opportunity to secure starter homes for local people and will be explored further.

### Will there be open space?

Yes. Open space including children's natural play spaces will be provided as part of the development. The proposal will also ensure linkages with the existing Public Rights of Way network to facility wider accessibility for recreation.

## Planning Policy

### What does the adopted Local Plan say about this site?

Planning law dictates that planning applications are determined in accordance with the adopted Local Plan unless material considerations indicate otherwise.

There is a clear need for new housing within the District, signaled by the preparation of a new Local Plan. The Strategic Housing Market Assessment update (January 2019) identifies those needs for Mid Suffolk over the next 18 years in detail.

In this case, the adopted Local Plan for Mid Suffolk identifies the site as falling outside of the Bramford settlement boundary and is subject to restrictive countryside policy. The Local Plan (Core Strategy Policy CS1) categorises Bramford as a 'Key Service Centre'. The Emerging Joint Babergh Mid Suffolk Local Plan changes the category of Bramford to a 'Core Village' under Policy SP03. Core villages are to act as a focus for development.

The housing policies of the adopted Local Plan 1998 and Core Strategy 2008 (with 2012 Focused review) are inconsistent with the National Planning Policy Framework (NPPF), and in accordance with the direction of the NPPF should be given reduced weight in decision making, because they are considered 'out of date' and will trigger the 'presumption in favour of sustainable development', which acts as a 'tilted balance' in favour of the proposal.

This is because the adopted Core Strategy 2008, which is the most recent Local Plan document, only looked to accommodate development needs up to 2021 and not beyond. Therefore, no new allocations were made following adoption of the Core Strategy leaving Mid Suffolk District Council to be reliant on the village development boundaries and extent of the Countryside established in the 1998 Local Plan. The development boundaries as adopted in the 1998 Local Plan and the current extent of the Countryside were not designed to accommodate development needs beyond 2006 but are now being used to accommodate development needs in 2020 and beyond **without any boundary amendments**. **Policy CS02 is 'out of date' because the Core Strategy** did not allocate sufficient sites to meet its needs in full and relied upon the subsequent Site Allocations and Development Management Plan to do so. This was abandoned and will be substituted with the Joint Local Plan, which has yet to be progressed to the point of a finding of soundness by an Inspector and adopted.

Core Strategy key objectives are to provide a safe and healthy community and prosperous thriving towns and villages with sustainable development that respond to the implication of climate change.

Policy CS2 specifies other criteria that must be met by new housing, against which Mid Suffolk District Council will assess the proposals.

Policy CS3 and CS4 set out the standards and initiatives for development in this regard, which include:

- use of low water volume fittings and grey water systems
- orientation to maximise solar gain
- high levels of insulation
- adequate provision for separation and storage of waste for recycling; and
- use of materials from a sustainable source in new development
- implementation of Sustainable Urban Drainage Systems into all new developments where technically feasible

The emerging Joint Local Plan Policy LP25 Sustainable Construction and Design, goes further by requiring all new development to minimise its dependence on fossil fuels.

The criteria of Policy CS8 sets out 900 new homes would be required on greenfield sites derived from Key Service Centres, up to 2025.

In addition, housing proposals should provide a mix of house types, sizes, and affordability to show demonstrate compliance with Policy CS9. Part of the housing provision will consist of affordable housing in compliance with Appendix A for key service centres, both inside and outside settlement boundaries. Policy CS9 also requires development to be in sustainable locations. The proposal scores positively when assessed against Policy CS9 as located immediately adjacent to Bramford village where new residents will support local facilities and services and is accessible by public transport.

## Development Benefits

### What are the benefits of this development?

(include infrastructure, BNG landscape, sustainable building construction methods etc.)

The Development provides four key benefits that will not be delivered by other exiting or new residential development. The first of these is the transport infrastructure upgrades through a new cycle and footpath highway between Ipswich and Bramford which will prioritise traveling between the two locations either on foot or on a bike without having to go via Bramford Rd which is busy and off putting for many less experienced cyclists due to the volume and speed of traffic combined with a lack of current dedicated cycle path.

The second key benefit is that our scheme has been designed to future homes standard 2025, which means that the scheme will deliver more efficient and future proofed homes. In addition, the homes will be low carbon through producing some of their own electricity via solar panels and air source heat pumps rather than tradition gas boilers.

The houses will also be making use of water recycling systems as well as restricted appliances so that they both use less water and also reuse the rain water harvested from the roofs which will be stored on the plot of each home to provide some of the water needed to run the house day to day.

The third key benefit is the creation of new areas of publicly accessible open space that will benefit existing local residents by increasing and enhancing local provision.

Our fourth key benefit is that the scheme is intending to provide a significant increase in net gain on the ecology of the site, this will be achieved by providing wild planting areas around the site, a community orchard, green roofs/walls and finally more open space compared to planning requirements.

### Will there be any benefits to the residents of Bramford?

The residents of Bramford will benefit from the new cycle and footpath infrastructure between the village and Ipswich providing a more sustainable way to get between the two as well as access to new areas of community orchard/public open space on the development.



## Transport

### What are the proposed vehicular access arrangements?

Vehicle access is proposed via a priority T-junction with Bramford Road along the western boundary of the site. It will be formed of a 5.5m wide carriageway and incorporate 2m wide footways on both sides that will connect with improved footways along the eastern side of Bramford Road. The design has been prepared in accordance with the requirements of the Suffolk Design Guide including visibility splays in both directions commensurate with the speed of traffic currently using Bramford Road.

### What impact will the additional dwellings have on the road network and congestion?

A Transport Assessment is being prepared in order to assess the impacts upon the local highway network. These will consider the traffic associated with the proposals as well as non-vehicular trips. We have initially considered the total travel demand that is anticipated to be generated during the typical weekday network peak hours of 08:00- 09:00 and 17:00-18:00 (since at these times the network would be most sensitive to an increase in traffic) and our analysis indicates the proposals could be anticipated to generate an increase of 80 and 71 two-way vehicle movements during the AM and PM peak hours respectively.

We have applied the above vehicle trips to a Census derived traffic distribution, which is reflective of those who currently live in the area, to the development traffic in order to consider the potential uplift in vehicles that can be anticipated through junctions within the study area. All analysis is submitted to Suffolk County Council as the Local Highway Authority for them to verify the work produced and any mitigation measures for the local road network as a result of the development will be identified.

### What is being done to prioritise sustainable travel and reduce reliance on the private car?

A comprehensive review of cycle connectivity in the area has been carried out in liaison with SCC to identify possible improvements locally. This has involved the scheme accommodating a new central pedestrian/cycle priority connection through the site to provide a largely traffic-free bypassing a section of Bramford Road. This strategy promotes a connection between Bramford and the western fringes of Ipswich where the proposed new connection will tie into existing pedestrian/cycle routes into the centre of Ipswich. This new facility will enhance pedestrian and cycle connections to Ipswich without requiring use of a car, whilst also providing an enhanced connection towards the centre of Bramford. The proposals will also be supported by a Travel Plan to encourage non-car access.

### What transport improvements will be facilitated by the development?

A new pedestrian/cycle connection is proposed through the site and will connect to improvements along Bramford Road between Bramford and the western fringes of Ipswich. These will include suitable new/improvement crossing points and the development would facilitate a largely traffic-free facility away from Bramford Road. Modelling and capacity analysis will also review the operation of local junctions to identify whether any off-site improvements are required and will be developed in liaison with SCC Highways.

### How many car parking spaces will there be for the people living in the houses?

The scheme is being brought forward as an outline planning application, with such matters of detail to be confirmed as part of a future Reserved Matters (RM) application which would follow any grant of outline planning permission. The RM application will provide details of the bedrooms each unit provides, however the work that has informed the preparation of this application makes commitments that car parking will be provided in accordance with the SCC Parking Standards (May 2019) and is appropriate for the type and size of



residential units provided. This will also include car parking for visitors in accordance with the requirements of SCC standards, as well as provision for electric vehicle charging.

SCC standards require a minimum of 1 space per 1-bedroom dwelling, 2 spaces per 2/3-bedroom dwelling and 3 spaces per 4+bedroom dwelling. An additional 0.25 spaces per dwelling are required as unallocated visitor provision.

### Does the proposal include cycle parking spaces?

In regard to cycle parking, SCC standards are applicable and although provision will be subject to subsequent reserved matters application, it is anticipated that garages will cater for cycle parking demand where provided, but for plots with no garage, a shed would be provided within the garden to cater for secure cycle storage. The detail of provision will be secured via suitably worded condition to ensure they meet latest standards.

### Will the people living in the houses be able to get to places that they need to by bus, cycle or walking?

We are proposing new pedestrian and cycle links as one of the benefits of the proposal. This will enhance footway and cycleway connectivity to the site as part of the development. These connections will link towards the Ipswich to the east and Bramford to the west. A Travel Plan will be provided in accordance with SCC guidance and will incorporate a commitment to provide Residential Travel Information Packs to all residents upon occupation to encourage sustainable travel. The Travel Plan will highlight sustainable travel options available locally including bus services, cycle and pedestrian routes, as well as seeking to provide incentives for non-car travel to further reduce the need to drive.

## Ecology

### What are the species found on the site, and will they be protected?

A Preliminary Ecological Appraisal report has been undertaken which identifies the site as primarily comprising hardstanding, poor semi-improved grassland, scrub, hedgerows, trees and tall ruderals. The findings of the extended Phase 1 Habitat Survey confirm that the habitats onsite have the potential to support foraging and roosting bats (in trees), reptiles, breeding birds, hedgehog and badger. The offsite buildings could support roosting bats and Barn Owl.

Surveys are underway by qualified ecologists in respect of identifying protected species, including;

- Breeding bird surveys
- Roosting and foraging bat surveys
- Reptile surveys

Reports are being prepared which will identify recommendations that will be fully complied with. The reports will be submitted as part of the planning application.

### Will the proposal bring biodiversity net gain?

The scheme is being designed with the aim of achieving significant biodiversity net gain in excess of current local and national policy expectations.

### Will there be any impact on wildlife sites in the area?

Two internationally protected sites, Stour and Orwell Estuaries (SPA, Ramsar), and the Deben Estuary (SPA, Ramsar), were noted within 13km. The proposed development site is situated within the Zone of Influence (ZOI) of recreational impact for these sites, as such, proposed development of the site poses a potential impact.

As the site is within the ZOI for Stour and Orwell Estuaries and the Deben Estuary, a financial contribution will be required in order to mitigate the impact of bringing additional people into an area which increases 'recreational disturbance'. **As such, a costing of £121.89 per dwelling** would be required to fulfil the Recreational disturbance Avoidance & Mitigation Strategy (RAMS), this will be secured via a Section 106 Agreement.

Within 2km of the site, there are two statutory designated nature conservation sites. The closest designation to site is Bramford Meadows Local Nature Reserve (LNR), a 9.01ha designation located 237m west of site, the second designation located within 2km of the site boundary is The Dales Open Space (LNR), a 5.88ha designation situated 1.9km east of site.

However, should the ecology surveys underway identify any habitats which could support the important species associated with either the statutory or non-statutory sites within 2km of the site, mitigation measures will be implemented.

## Flooding and Drainage

### Is the site liable to flooding?

According to the Environment Agency's indicative floodplain mapping, the site is classified as being within Flood Zone 1 site with a low probability of fluvial (river) and/or tidal flooding (less than 1 in 1,000-year annual probability of river and sea flooding (<0.1%) in any year). This indicates the River Gipping, in close proximity, will not flood the development.

Further indicative mapping produced by the Environment Agency for the local area, suggests the majority of site is not susceptible to any surface water (overland) flooding with a small area to the north suggested to have a low probability of some flooding. This area will be accommodated within the design of the site layout to ensure no part of the development will be affected should any overland surface water occur.

Information assessed from historical borehole records available on the British Geological Surveys website and three trial pits undertaken on-site undertaken in March 2021; indicate the site is not at risk of any groundwater flooding. However, groundwater monitoring shall be carried out to confirm this.

### Will the development cause flooding?

The proposed drainage system will ensure that all surface water that lands on the proposed hardstanding areas (roofs, driveways, roads, cycleways etc) will be captured and stored. This water will be released at a very slow rate to ensure no flooding to the development or surrounding local area.



### How is rainwater going to drain?

Sustainable drainage systems will be used to control runoff from the site to a greenfield discharge rate ensuring the development does not increase flood risk off-site. Systems such as permeable paving, swales and dry attenuation basins will form part of the drainage system.

The post-development surface water discharge rate will be controlled to match the existing greenfield discharge rate, ensuring no increase in runoff from the existing scenario.

The on-site surface water drainage infrastructure will be designed to comply with national and local policy and be able to withstand the impact of a 1:100-year (plus climate change) rainfall event.

The planning application will be accompanied by a site-specific Flood Risk Assessment to cover the above information in more detail.

## Contamination

### Is the site contaminated?

An initial site appraisal has been undertaken which identified several commonly occurring potential sources of contamination at the site. These potential sources are backfilled brick pits and suspected fill materials. A limited ground investigation did not identify any significant evidence of contamination at the site; however, additional investigation works are proposed to further assess the potential for contamination. These works include:

- An intrusive ground investigation to determine the extent of potential contamination within the soil strata and if necessary, the groundwater; and,
- Installing and monitoring wells for ground gas / groundwater.

Should contamination be identified, then remedial works would be undertaken.

## Environmental Impact Assessment

### Will the environmental impact of the proposals be assessed?

An environmental impact assessment screening opinion has been sought from Babergh District Council to determine the need for an Environmental Impact Assessment. This was supported by a screening report appraising the likely environmental impact of the development. This report concluded that the Proposed Development alone, or in combination with committed developments is unlikely to give rise to any significant environmental effects, following mitigation that would be secured through planning condition or legal agreement, as is commonly undertaken, and that EIA is therefore not required. This will be confirmed **following receipt of Babergh District Council's screening opinion. The environmental impacts of the proposals** will however be assessed and documents covering each issue, such as flood risk, ecological impacts, heritage impact etc will be submitted with the planning application.

## Noise

### Will the site be susceptible to noise impacts and, if so, what will be done about this?

The site is located adjacent to existing residential areas to the north, south and east and is bounded by the A14 to the east. The proposal will include 3 meter acoustic barrier (fence) along the eastern boundary to mitigate noise impacts from the A14.

A full Acoustic Report and specifications of the noise barrier will accompany the planning application.

## Air Quality

### What affect will the A14 have on air quality and the health of residents?

An initial study has been undertaken to determine 'current' (2019) air quality conditions within the Site, taking into consideration emissions from vehicles travelling along the A14. Based on this study and the most up-to-date plans, 'current' concentrations of pollutants fall below the relevant national pollutant objectives at all of the proposed residences, with much of the Site experiencing concentrations of pollutants that are well below national requirements (i.e. good air quality). It should also be noted that, as air quality in the UK is anticipated to improve over the coming decade, it is expected that by the time that the development is operational concentrations of pollutants will have reduced even further. As such, all future residents will experience acceptable air quality; an update to the previous study will be undertaken as part of the planning application to ensure that this is the case.

## Landscape and Visual Assessment

### What will the visual impact of the development be?

The development has been carefully designed to minimise landscape and visual effects by maintaining the enclosed nature of the site. The proposal seeks to preserve the existing site landscape structure and character by breaking the layout into two smaller housing parcels, which are each framed and set within landscaped boundaries linked by green infrastructure throughout the site layout. New public open space is to be provided throughout the site.

The site is well contained in the local landscape and the proposed development is not predicted to be significantly visible beyond the immediate environs of the site. Established and well defined existing boundaries will be retained, and the low density two storey development proposed would reflect locally distinctive patterns of development.

A Landscape and Visual Impact Assessment, as well as a Arboricultural Impact Assessment is being undertaken and will be submitted as part of the application.

## Landscape

### What are the benefits of the landscape proposal?

The proposals would create 4.8ha of new publicly accessible open space with an emphasis on biodiversity enhancements, incorporating areas of new woodland, an orchard, wildflower meadow and play space.

### Will the open space be available for non-residents?

The open spaces created would be available to residents and non-residents alike

### What type of play equipment will be provided?

An area of natural play is proposed that would provide play opportunities for a mix of ages and abilities

## Heritage

### How are heritage assets being considered in the proposal?

The significance of heritage assets in the vicinity of the Site will be assessed within a Heritage Statement submitted as part of the planning application, and the proposed development will seek to ensure that the scheme does not harm this significance. This includes ensuring that the contribution of the surroundings of a heritage asset to its significance is taken into consideration also.

### What will be done to protect their setting?

Design mitigation will seek to ensure an appropriate relationship between the heritage assets and the proposed development through the use of proposed landscape buffers between proposed and existing buildings, retaining existing established well defined treed boundaries filtering views and sensitively designed and scaled houses.

### What will the impact be on listed buildings?

The Gables to the west of the site is a Grade II Listed Building. The key elements of The Gables significance (such as its historical fabric and architectural style) will not be altered by the development, and the measures described above will seek to ensure that the proposed development results in no harm to the significance of the Listed Building through changes to its setting. This would be assessed in detail in a Heritage Statement that will be submitted as part of the planning application.

## Archaeology

### Is the site important for archaeology?

It is not anticipated that the site is in an area of importance for archaeology. However, an Archaeology Assessment will be submitted as part of the planning application. The Site lies in proximity to the course of the River Gipping and during the early prehistoric period, the banks of the river were a hub of activity. In the later prehistoric period, the local landscape displays evidence of Bronze Age ceremonial practice and Iron Age settlement. The presence of pottery, coins and brooches suggests Roman activity in the vicinity, which was then followed by the establishment of the Anglo-Saxon settlement at Bramford. The Site lies to the east of the centre of Bramford, and, it is possible that during the medieval period, the Site formed part of the agricultural land that supported the settlement and nearby farmsteads.