

## IXWORTH & IXWORTH THORPE PARISH COUNCIL

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PARISH COUNCIL

Date: 09 June 2025

Sarah Drane – Planning Case Officer  
West Suffolk Council  
West Suffolk House  
Western Way  
Bury St Edmunds  
Suffolk  
IP33 3YU

Dear Sarah,

**REF: DC/25/0666/HYB – LAND OFF CROWN LANE**

Further to our meeting held on 28 May 2025, this letter sets out our response as a statutory consultee to the above-mentioned planning application.

Whilst the Parish Council recognises the need for new housing in Ixworth and welcomes the prospect of new development, it must be balanced with suitable infrastructure investment and upgrades which makes suitable provisions to withstand the impacts of these developments. Notwithstanding this point, there are significantly inherent issues arising from this application which the Parish Council unanimously voted to **OBJECT** on the following grounds:

### **Site Masterplan Requirement**

The emerging local plan cites that "*Before development can commence and a planning application is approved, a site masterplan will need to be prepared and adopted for the whole allocation taking into account current and emerging national and local planning policies and local environmental and infrastructure constraints.*"

The applicant has on two occasions during 2024 attempted to submit iterations of masterplan to West Suffolk Council for endorsement and adoption and on both occasions has failed to do so. Submitting a masterplan contemporaneously to a planning application of this size and scope fails to adhere to this policy requirement and on this basis alone, any planning application should be **REFUSED**.

### **Quantity and Density of Housing**

The Parish Council are not prepared to support an application on this site for greater than the number outlined in the emerging local plan. This application seeks to deliver a quantity of houses that is not compatible with policy AP30 of the emerging local plan that explicitly states 145 homes. In real terms, the proposed density of the housing development is greater than any other development in Ixworth. The applicant has suggested that the proposed style of housing that contributes to the density is in line with the village's character, but this is entirely disingenuous. They have referenced the style of the housing on our High Street as a benchmark for creating what is proposed. Our High Street is in a conservation area with housing that dates back several

centuries. It would be prudent to consider the style and consequential density of housing in modern developments against similar existing estates of which Thistledown Drive and Micklethwaite Estates were developed in the late 1990's on a far lower density than what is proposed here. Moreover, it should be recognised that this site is also not allocated within the Ixworth and Ixworth Thorpe Neighbourhood Plan that was ratified by a referendum held on 8 May 2025 and is therefore incompatible with the Neighbourhood Plan which should result in the application being **REFUSED**.

### **Highways & Site Access**

Policy AP30 of the emerging local plan states "a safe and suitable access for all users should be provided onto the A1088", the proposed access is neither safe, nor suitable.

Ghost Island junctions along the A1088 have been the subject of much scrutiny since the Crown Lane Masterplan was adopted in 2010 and embedded into Rural Vision 2031 which has come as a result of extant planning consent approved by the Planning Inspector for a Right-Hand Ghost Island Junction for up to 475 dwellings, off the A1088 to serve sites Rv12b and Rv12c of Rural Vision 2031. At the Bardwell Road staggered junction, there have been at least two fatalities, and further serious accidents that have involved the presence of multiple air ambulances. At the Thetford Road Junction, a fatal accident occurred in May 2017 where HM Coroner ruled that the design/style of this junction was contributory to that accident and where remedial works were by Suffolk County Council that have not been delivered in full. All this clearly demonstrates how unsuitable such a junction style is along the section of highway in question. The Parish Council have attempted to engage with the applicant for over a decade as to its proposed access arrangements, all of which have met with continued intransigence to our very real concerns.

In 2014, Suffolk County Council stated that in the event a ghost island junction was delivered as the primary form of access to site, modifications would be needed to the A1088/A143 roundabout that is in close proximity to this site to upgrade it to present recognised design standards. The current A1088/A143 roundabout design is substandard in regard to deflection at every approach, encouraging high circulatory speeds. The KMC drawing ref KMC24030 / 002 submitted as part of the Transport Assessment shows proposed additional flaring on the northern and eastern arms of the roundabout. This would only serve to reduce the already substandard levels of existing deflection and allow vehicles to travel faster through the junction. The proposed junction modifications as well as the intensification of use caused by development trips would only serve to exacerbate existing design flaws. There is nothing proposed within this application which seeks to deliver upon the requirements set out by Suffolk County Council.

Following consultation with Ixworth Parish Council the applicant has reviewed the option to access the proposed Site via an alternative left in / left out access arrangement from the A143. This review overstates the short comings in the alternative access arrangement and more assessment should be carried out to explore this option fully.

The applicants' reasoning for discounting the alternative access arrangement are as follows:

*"The implications on link capacity as a result of the introduction of an additional junction on the A143. The existing A143 single lane carriageway can accommodate a finite volume of traffic between junctions and traffic merging from potential slips will impact on the currently unopposed flow of A143 traffic."*

Response - Left in/left out movements have little impact on the free flow of mainline flows. A large proportion of the development trips route through this section of the A143 with the currently proposed access arrangement. The additional trips assigned to the A143 because of the alternative access arrangement would not be significant against the backdrop of existing A143 flows.

*"The junction spacing between the two existing roundabouts and the interaction with the northbound climbing lane. Dependent on the location of the A143 access, there will be just 250-300m spacing to accommodate the northbound climbing lane, allow vehicles to merge with mainline traffic and then reduce speeds to manoeuvre*

*through the northern roundabout. This will create unnecessary weaving and merging along a length of carriageway with a restricted speed limit."*

Response - There is 640m between the southern boundary of the proposed development Site (discounting the land set aside for the pedestrian bridge) and the northern roundabout and approximately 370m between the end of the northbound climbing lane and the northern roundabout. This should be sufficient space to accommodate the alternative access arrangement.

*"The left in / left out arrangement would require all traffic to make a U-turn manoeuvre at the roundabout junctions north and south of the site. This would have a detrimental impact on the capacity of the junction as all arms would need to give way to a vehicle undertaking a U-turn."*

Response – This is an exaggeration. All movements would not be required to make a U-turn.

*"U-turns would not be an anticipated manoeuvre at the junction and therefore could result in an increase in collision as drivers misinterpret vehicle signals."*

Response – In time driver behaviour would adapt to expect U-turns at both roundabouts following the introduction of the alternative access arrangement. The majority of accidents at roundabouts are low speed events when compared to those at ghost island junctions located on restricted roads.

*"The impact on the existing vegetation on the eastern boundary of the site. The slips would require a 215m visibility splay in each direction and therefore 430m of impact on and potential vegetation removal. Furthermore, the slips would require engineering works over an existing ditch, and this will also impact on existing vegetation."*

Response – The suggested 215m visibility splays would only be required at the left out slip not both 'slips' as implied. The length of the visibility splays could potentially be reduced following traffic surveys demonstrating design speeds lower than 60 mph. An ATC was undertaken by the applicant on the A143 that could provide an indication of design speeds, however, this data has not been fully appended to the submission.

Although a degree of vegetation is inevitable, this loss would be partially offset by the vegetation retained on the A1088.

It is therefore clear additional assessment and design work needs to be carried out by the applicant before the alternative access option is discounted.

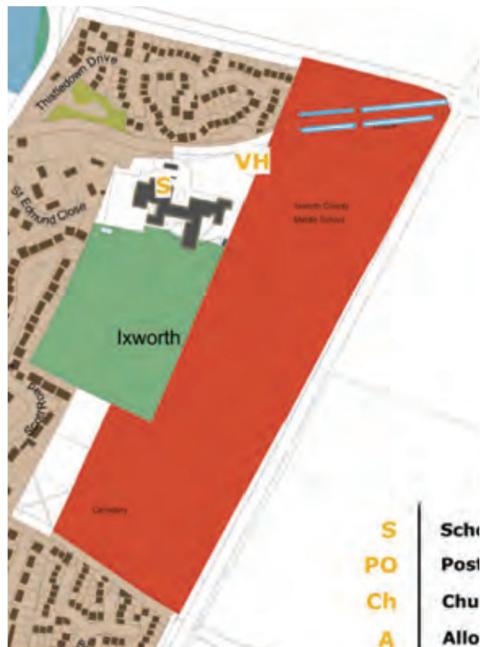
The Parish Council maintains that Suffolk County Council (as the statutory highway authority) have a duty to not just look parochially at this site exclusively. There is a clear, obvious requirement for a more holistic view that integrates impacts to the immediate highway network from both this application, and that of other sites allocated for development – for example, site AP29 – Land off Bardwell Road. Looking at the access arrangements to this planning application in isolation would disregard the duty of the Highways Authority to consider the wider impacts and until this is done, this application deserves to be **REFUSED** on this matter alone, let alone the other significantly material considerations demonstrating how unsuitable the proposed access arrangements are.

The Parish Council are very concerned at the proposed road layout and the use of "shared" designations. This will contribute to excessive congestion from parked vehicles and the inability for moving traffic to manoeuvre safely around the site.

The Parish Council are seriously concerned that in the event a road is built onto the extant approved ghost island junction that the extent of traffic congestion on the immediate neighbouring road network would see motorists attempt to "bypass" the bypass by turning left from the site, and then proceed to turn left and come through the High Street to then exit south onto the A143 at Mulley's Roundabout on Stow Road. Whilst planning applications, by their very nature, are not intended to solve 'existing' problems, if this junction is utilised it would create a new problem, and we implore with Suffolk County Council Highways to demonstrably support our concerns.

## **Site Allocation Boundary**

Rural Vision 2031 sets out that the boundary of this site's allocation is as follows:



As is clear, the land directly behind Ixworth Cemetery is not included in the site for allocation yet the applicant is including this land in this application. This is despite being fully aware that the Parish Council has been in dialogue with the landowner for more than a decade in ascertaining the acquisition of this land for the extension of the Cemetery. This was formalised in a letter to the landowner on 16 December 2021. It is proposed to place a footpath/cycle path that connects Scott Road with the emerging development as well as an electricity substation that encroaches on the boundary of this land.

The Parish Council asserts that this application must be **REFUSED** based on it proposing to develop on land that is outside the site allocation boundary. If this application is not refused, it must be a planning condition that this land is exclusively provided to the Parish Council through a S106 allocation for the purposes of enhancing and expanding our cemetery.

## **Primary School Education Capacity**

Having originally submitted a full planning application; we note that the planning application has reverted to a hybrid state owing to the desire to seek only outline planning consent for land reserved for educational purposes which in our case would see the delivery of a new Primary School.

The Parish Council are very concerned at the "outline" nature of this part of the application. It is clearly demonstrated that a new primary school would be required given Suffolk County Council's advocacy of land being reserved to facilitate this. Furthermore, it is clear from the proposed numbers of houses from this site as well as in application DC/25/0370/OUT that there is an unequivocal requirement for a new primary school. By designating this element of the site at "outline" could give rise to an opportunity in the future that should the need for a new primary school not become apparent that the applicant could then seek to introduce yet more housing to this parcel of land.

In the event of any planning consent being granted, the Parish Council wishes to see a more restrictive condition that is not time sensitive that ensures that in the event educational use is not required on this site, that it is not automatically turned over to housing and becomes something "non-residential"

## **GP and NHS Primary Care Service Accessibility**

NHS SNEE ICB has already identified that this development will exacerbate capacity at Ixworth Surgery. Built in 1978, Ixworth Surgery is a single-storey facility that is now landlocked having gone through three different

extensions in the last 30 years. Present car parking on the site is constantly occupied to a level of at least 70% owing to the number of staff employed at the surgery. Even if the building could be expanded to a second storey, the car parking would prohibit that occurring. With the ongoing challenges faced and well documented to the public being able to access GP and rural pharmacy services, the contributions proposed to mitigate the impact to GP and Primary Care Services in Ixworth are totally inadequate. Ultimately, Ixworth needs a new fit-for-purpose community health centre that provides a raft of current, and new services in line with the NHS 10-year plan that sets out the requirement for more preventative medicine rather than curative and the access to community services is vital to achieve that. With our nearest alternate surgery at Stanton having no capacity and constrained by development coming from its own village, the Parish Council believe that until more substantive provisions are made to enhance the long-term provision for GP services that this application must be **REFUSED**.

### **Community Recreation Infrastructure**

This application offers nothing to the community of Ixworth, both existing and future, by way of community recreation infrastructure. More could be offered from this site by way of green open space to provide additional play equipment to the future residents of the proposed site yet fails to do.

In November 2024, a collaboration between Ixworth and Ixworth Thorpe Parish Council and the Jiggins Memorial Trust commissioned Place Services of Woodbridge, Suffolk to provide an outline as to what would be required to enhance and upgrade Ixworth Village Hall. Presently, Ixworth Village Hall dates back to 1932 where extensions have further taken place in 1976 and 1990. The facilities lack long-term viability given its multivariate fit-for-purpose issues whilst being a staple to this community, as a designated Key Service Centre. Situated directly next to the Playing Fields, it is essential that development coming to Ixworth makes suitable provisions for enhancements to such facilities as part of the Section 106 agreement conditioned to any planning consent that may be given. This collaborative effort will shortly provide a detailed narrative based on user evidence as well as community engagement on its appetite for the future of these facilities. It is essential that this is upgraded to ensure the longevity of Library Services which the existing Village Hall provides, and any future facility must include provisions for this.

As a result of extensive discussions between both the Parish Council and the Jiggins Memorial Trust, the applicant is well aware of the needs arising here yet disappointingly proposes absolutely nothing to the community of Ixworth by way of any enhancements to these facilities. Until a comprehensive improvement is made to this, the Parish Council considers it appropriate to **REFUSE** planning consent in the absence of any proposed mitigations as set out above and a substantial contribution towards the cost of providing suitable community infrastructure at a level appropriate for the proposed greatly increased population numbers that will follow if this application is approved.

Yours sincerely,  
For and on behalf of Ixworth and Ixworth Parish Council



Ben Lord  
Chairman