

## **Environmental Information Regulations – Response - 26600**

*The request relates to the proposed large-scale residential development of approximately 1,300 new homes by Bloor Homes, located on land South of Foxhall Road / East of Dobbs Lane, near Martlesham and Ipswich.*

*We request all recorded information relating to Suffolk County Council's pre-application consultation and professional advice, as well as specific baseline infrastructure data.*

### **Part A: Pre-Application Consultation Records (Jan 2023 - Present)**

*We request all written advice, formal notes, or correspondence (including emails and minutes of meetings) sent from SCC to the developer (Bloor Homes, or their agents/consultants) regarding this specific site:*

*1. SCC Highways Pre-Application Advice: Specifically addressing the scope of the required Transport Assessment (TA), the impact on the local highway network (Foxhall Road, Dobbs Lane, and A12 junctions), and initial requirements for access/mitigation. Please see the following file containing the following two emails:*

- Email 05-11-2025 - Foxhall Road Pre-App\_redacted\*
- Email 06-11-2025 - Foxhall Road Pre-App\_redacted

*Please note, these are the only documents Suffolk County Council (SCC) is able to release from the pre-application phase. Any other correspondence is withheld under r. 12(5)(d) Confidentiality of Proceedings, r.12(5)(e) Confidentiality of Commercial or industrial information and r.12(5)(f) interests of the person who provided the information to the public authority of the Environmental Information Regulations 2004 (EIR) – see below for full explanation.*

*2. LLFA Pre-Application Advice: Specifically addressing the required scope of the Flood Risk Assessment (FRA) and Surface Water Drainage Strategy, and any initial concerns regarding existing flood risk or drainage capacity in the immediate or downstream area. Information withheld as per Q1 above – see below for details.*

*3. SCC Education Department Advice: Specifically addressing the projected pupil yield from a 1,300-dwelling development and the required financial contribution (S106 or CIL) necessary for primary and secondary school provision.*

*Please see: <https://www.suffolk.gov.uk/planning-waste-and-environment/planning-and-development-advice/section-106-planning-obligations/developers-guide-to-infrastructure-contributions-in-suffolk>*

*4. SCC Archaeological Service (Scheduled Monuments & HER) Advice:*

*o All advice regarding the two (or more) Scheduled Monuments (SMs) located on the site,*

specifically detailing the potential impact of the proposed development on the significance and setting of these monuments.

See the following file containing the following two emails – as per Q1, these are the only documents SCC is able to release:

- Email 20-08-2025 - Land off Foxhall Road Ipswich\_redacted.pdf
- Email 26-08-2025 - Land off Foxhall Road Ipswich Geophysics WSI\_redacted.pdf

o Any formal responses, reports, or correspondence received by SCC from Historic England regarding the potential impact on the SMs.

There has been no correspondence with Historic England on this matter.

o Copies of the original designation documents held by SCC's Historic Environment Record (HER) that define the national importance of the Scheduled Monuments.

This information is not held by SCC; Historic England are the primary record holders and the information requested is publicly available on HE's designations listing.

## **Part B: Baseline Infrastructure Data**

We request the following public baseline data:

1. School Capacity Data (Last 4 Academic Years): For the primary and secondary schools serving the Martlesham and Kesgrave catchment area (e.g., Martlesham Primary Academy and Kesgrave High School), please provide:

- o The Published Admission Number (PAN).
- o The current total student roll for each school.
- o The resultant surplus or deficit of school places.

School	SCC School Capacity Data (Last 4 Academic Years)			
	2022/23	2023/24	2024/25	2025/26
Bucklesham Primary School	105	105	105	105
Kesgrave High School	1922	1922	1922	1922

School	Published Admission Number (PAN)
Bucklesham Primary School	15
Kesgrave High School	308
Kesgrave High School Sixth Form	44

School	Current Total Student Roll (as at 02/12/25)	Surplus / Deficit of School Places (Based on 2025/26 Capacity)
Bucklesham Primary School	91	14
Kesgrave High School	1855	67

*2. Traffic Count Data: The most recent Average Daily Traffic (ADT) and peak hour traffic count data (last 3 years) for Foxhall Road and Dobbs Lane, near the proposed access points.*

This is a paid-for service; please see the following file containing 'Traffic Count Data 26600.docx' for details.

*3. Accident Data: The full Personal Injury Accident (PIA) data (location, severity, and contributing factors) for the last 5 years for Foxhall Road, Dobbs Lane, and the A12 junctions that would be impacted.*

See the following file containing: 'Collision Data - 26600 - 01-09-20 to 31-08-25.xlsx'.

*4. Historical Flood Incidents: Records of recorded pluvial (surface water) and fluvial (river) flood incidents in the Martlesham/Foxhall Road area over the last 10 years.*

Copy of incident record included in file '2025-11-24 FoxhallRdFoxhallHistFlooding.pdf'.

## **Pre-Application Advice Exemption**

Suffolk County Council can confirm that they hold this information; however, we are withholding it under r. 12(5)(d) Confidentiality of Proceedings, r.12(5)(e) Confidentiality of Commercial or industrial information and r.12(5)(f) interests of the person who provided the information to the public authority of the Environmental Information Regulations 2004 (EIR).

### **Regulation 12(5)(d)**

Regulation 12(5)(d) of the EIR allows a public authority to refuse to disclose information to the extent that its disclosure would adversely affect the confidentiality of the proceedings of that, or any other, public authority, where such confidentiality is provided by law.

To engage this exemption 3 conditions must be met.

**Condition one:** the confidentiality in question must specifically relate to the confidentiality of proceedings. Suffolk County Council (SCC) offers a paid for, pre-planning application advice service where officers will provide an impartial assessment of proposals and indicate any potential policy conflicts or shortcomings within the application, including where further information may be needed.

In previous decision notices, including IC-292887-Z7J4, the Commissioner has acknowledged that such processes represent a 'proceeding' for the purposes of r.12(5)(d).

**Condition two:** the confidentiality must be provided by law. SCC believes that the information meets the threshold for the common law of confidentiality as the information is not trivial and was submitted by the applicant as part of the pre-application advice process and deemed by them to be confidential. Pre-application advice is not a statutory function; it is a voluntary process designed to assist developers with identifying and addressing any potential issues early on, prior to submitting a planning application for formal consideration. Planning applications and

their supporting documents are made available to the public but pre-application advice does not form part of this process or outcome. It is up to the applicant whether they take the advice provided and it is regarded as confidential by both SCC and the planning applicants.

**Condition Three:** it must be demonstrated that disclosure would have an adverse effect on the confidentiality of the proceedings in question. Planning applicants who request pre-planning advice have an expectation when they enter the process that it is confidential. If SCC then discloses this information to the world at large, there would likely be significant damage to the relationship the applicants have with SCC, along with future relationships with that applicant or others.

Whilst in this situation a planning application has now been submitted, releasing the pre-planning advice provided and setting a precedent for doing so, simply because an application has been made, would significantly impact the current and any future applicants' trust in SCC and, therefore, their willingness to engage with the pre-application process. If applicants do not feel that they can trust SCC, this would significantly undermine the process of providing a confidential pre-application opinion and undermine their ability to have full and frank discussions regarding the planning proposals at hand. Another purpose of the pre-application process is to avoid SCC spending time and resources on considering inappropriate and non-compliant planning applications. Whilst there is no guarantee a subsequent application will be approved, it assists applicants and the Council by potentially improving the quality of applications.

Even though SCC considers, through the three conditions being met, therefore, engaging r.12(5)(d), the public interest test must still be considered.

Public interest arguments in favour of disclosure:

- Facilitate openness and transparency in Suffolk County Council's affairs.
- Facilitate the accountability and transparency of Suffolk County Council's decisions.

Public interest arguments in favour of withholding:

- Providing a confidential setting for pre-application advice allows for comprehensive and frank discussions that may not take place if public. Keeping conversations confidential improves engagement.
- Applicants who do not engage with pre-application advice are more likely to have their planning applications rejected, costing Suffolk County Council more time and money.
- An applicant does not need to follow any pre-application advice provided when submitting any formal planning application. Nor is the decision-maker for any subsequent formal planning application bound by any pre-application advice.

Accordingly, we have determined that it is not in the interest of the Council to release the information. Therefore, this information is withheld under r.12(5)(d).



## **Regulation 12(5)(e)**

Regulation 12(5)(e) allows a public authority to withhold information where its disclosure would adversely affect the confidentiality of commercial or industrial information where such confidentiality is provided by law to protect a legitimate economic interest.

In order to engage this exemption, the following questions must be considered:

**1. Is the information commercial or industrial in nature?**

The request relates to pre-planning advice for a development in Suffolk and, therefore, is classed as commercial information.

**2. Is the information subject to confidentiality provided by law?**

SCC believes that the information meets the threshold for the common law of confidentiality as the information is not trivial and was submitted by the applicant as part of the pre-application advice process and deemed by them to be confidential. Pre-application advice is not a statutory function and is a voluntary process designed to assist developers with identifying and addressing any potential issues early on prior to submitting a planning application for formal consideration. Planning applications and their supporting documents are made available to the public but pre-application advice does not form part of this process or outcome. It is up to the applicant whether they take the advice provided and is regarded as confidential by both SCC and the planning applicants.

**3. Is the confidentiality provided to protect a legitimate economic interest?**

Disclosure of pre-planning advice into the public domain would provide other individuals with a strategic advantage. Individuals or organisation could obtain strategic intelligence whilst maintaining their own confidentiality around any proposals they may have to develop the area. Consequently, this would mean that any planning applicants' economic interests would be adversely affected. Releasing the information alongside setting a precedent for releasing the information, would likely lead other organisations/individuals to submit requests for copies of pre-planning advice we have provided/been requested, to gain insights on any potential developments or proposed plans they could use before any planning application was published.

**4. Would the confidentiality be adversely affected by disclosure?**

Whilst in this situation a planning application has now been submitted, releasing the pre-planning advice provided and setting a precedent for doing so because an application has been made, would significantly impact the current and any future applicants trust in SCC and, therefore, their willingness to engage with the pre-application process. If applicants do not feel that they can trust SCC, this would significantly undermine the process of providing a confidential pre-application opinion and undermine their ability to have full and frank discussions regarding the planning proposals at hand. Another purpose of the pre-application process is to avoid SCC spending time and resources on considering inappropriate and non-compliant planning applications. Whilst there is no guarantee a subsequent application will be approved, it assists applicants and the council by potentially improving the quality of applications.

Even though SCC considers, through the four conditions having been met, therefore, engaging r.12(5)(e), the public interest test must still be considered.

Public interest arguments in favour of disclosure:

- Facilitate openness and transparency in Suffolk County Council's affairs.
- Facilitate the accountability and transparency of Suffolk County Council's decisions.

Public interest arguments in favour of withholding:

- Pre-planning advice is not the same as a planning application. Planning application information is released into the public domain once an application has been made releasing relevant information into the public domain at that stage.
- Releasing pre-planning advice, which has been provided in confidence, into the public domain would likely result in individuals and developers being discouraged from taking up pre-planning advice, which is not mandatory, for fear their information would be released into the public domain. This would likely result in more work for SCC through more refusals as issues would not have been able to be discussed at the earliest opportunity before any proposals had been presented.
- Releasing pre-application planning advice would harm SCC's ability to carry out the process effectively. The applicants would no longer trust SCC with their confidential information and either not engage with the process or withhold vital information over concerns it would be made public.
- Providing a confidential setting for pre-application advice allows for comprehensive and frank discussions that may not take place if public. Keeping conversations confidential improves engagement.
- Applicants who do not engage with pre-application advice are more likely to have their planning applications rejected, costing Suffolk County Council more time and money.
- An applicant does not need to follow any pre-application advice provided when submitting any formal planning application. Nor is the decision maker for any subsequent formal planning application bound by any pre-application advice.

Accordingly, we have determined that it is not in the interest of the Council to release the information. Therefore, this information is withheld under r.12(5)(e).

**Regulation 12(5)(f)**

Regulation 12(5)(f) allows a public authority to withhold information where disclosing it would adversely affect:

*“(f) the interests of the person who provided the information where that person –*

- i. *Was not under, and could not have been put under, any legal obligation to supply it to that or any other public authority;*
- ii. *Did not supply it in circumstances such that that or any other public authority is entitled apart from these Regulations to disclose it; and*
- iii. *Has not consented to its disclosure.”*

In order to engage this exemption, a four-stage test must be considered:

**Stage one** – was the person under, or could they have been put under, any legal obligation to supply the information to the public authority?

SCC can confirm that the applicant was not under any legal obligation to supply the information. Pre-planning advice is not mandatory.

**Stage two** – Did the person supply the information in circumstances where the recipient public authority, or any other public authority, was entitled to disclose it other than under the EIR?

The information was provided as a request for pre-planning advice and not as part of a formal planning application. The pre-application process is designed to provide applicants with impartial advice regarding their proposed scheme and where improvements or changes may need to be made should they decide to submit a formal planning application, details of which would then be placed into the public domain.

**Stage three** – has the person supplying the information consented to its disclosure?

The information was provided to SCC with the expectation that it would remain confidential and not be published in the public domain, the applicant has not consented to its disclosure. The pre-planning advice service is not mandatory nor is it a formal planning application where the information would be made publicly available.

**Stage four** – would disclosure adversely affect the interests of the person who provided the information to the public authority?

Whilst a planning application has been submitted in this case (and all information in relation to it has been made publicly available), setting a precedent to release non-mandatory pre-planning advice would lead to harm for future applicants as it would highlight how potential developers could access information disclosed in confidence to SCC, to allow them to adapt their own strategies or provide them with insights on other organisations' considerations, which would be detrimental to the interests of the developer. Releasing information of speculative proposals would lead to enquiries/objections about hypothetical scenarios and may also generate wider misinterpretation and confusion. Whilst some of the advice will have been generated by SCC, it is inextricably linked to and reveals the content of the information that has been provided in confidence by the applicant.

Even though SCC considers through the four conditions have been met therefore engaging r.12(5)(f) the public interest test must still be considered.

Public interest arguments in favour of disclosure:

- Facilitate openness and transparency in Suffolk County Council's affairs.

- Facilitate the accountability and transparency of Suffolk County Council's decisions.

Public interest arguments in favour of withholding:

- The information relates to pre-planning advice and confidential information that the applicant was not required to disclose to SCC; it does not represent a full planning application. Releasing information that has not formed or been included in a formal planning application, would likely lead to hypothetical questions being asked on information that is not relevant. All information in line with the planning application has been published in the public domain.
- The pre-planning advice includes commercially sensitive information that the applicant was under no obligation to provide. Pre-application advice would only be available through an EIR request and is not published online. Disclosing this information and setting a precedent for this type of information to be released into the public domain would provide competitors with a way to access other applicants' strategies and plans, with the view to undermine/undercut them with their own. This would also result in less applicants being willing to use the pre-planning application process or not sharing all relevant information for the best advice due to concerns about it being released into the public domain. This would result in more work for SCC staff at more expense due to issues in planning applications that could have been avoided if the process had been engaged.
- Any and all planning applications are subject to full public consultation. The pre-planning advice does not form part of a planning application; it is assistance in identifying potential problems before a planning application is lodged. All relevant information in relation to a planning application is made public for anyone to review.

Accordingly, we have determined that it is not in the interest of the Council to release the information. Therefore, this information is withheld under r.12(5)(f).

\*Redacted Information

All information released in response to a Freedom of Information Act 2000 (FOIA) or Environmental Information Regulation 2004 (EIR) request is deemed to be in the public domain. As such we must consider whether or not the requested information qualifies as personal information and should therefore not be released into the public domain.

The council has determined that this is personal information and is therefore exempt from disclosure under **section 40** of the FOIA and **regulation 13** of the EIR.

The Council considered the following, including the possible consequences of disclosure for the data subjects concerned and their reasonable expectations as to the use of their data:

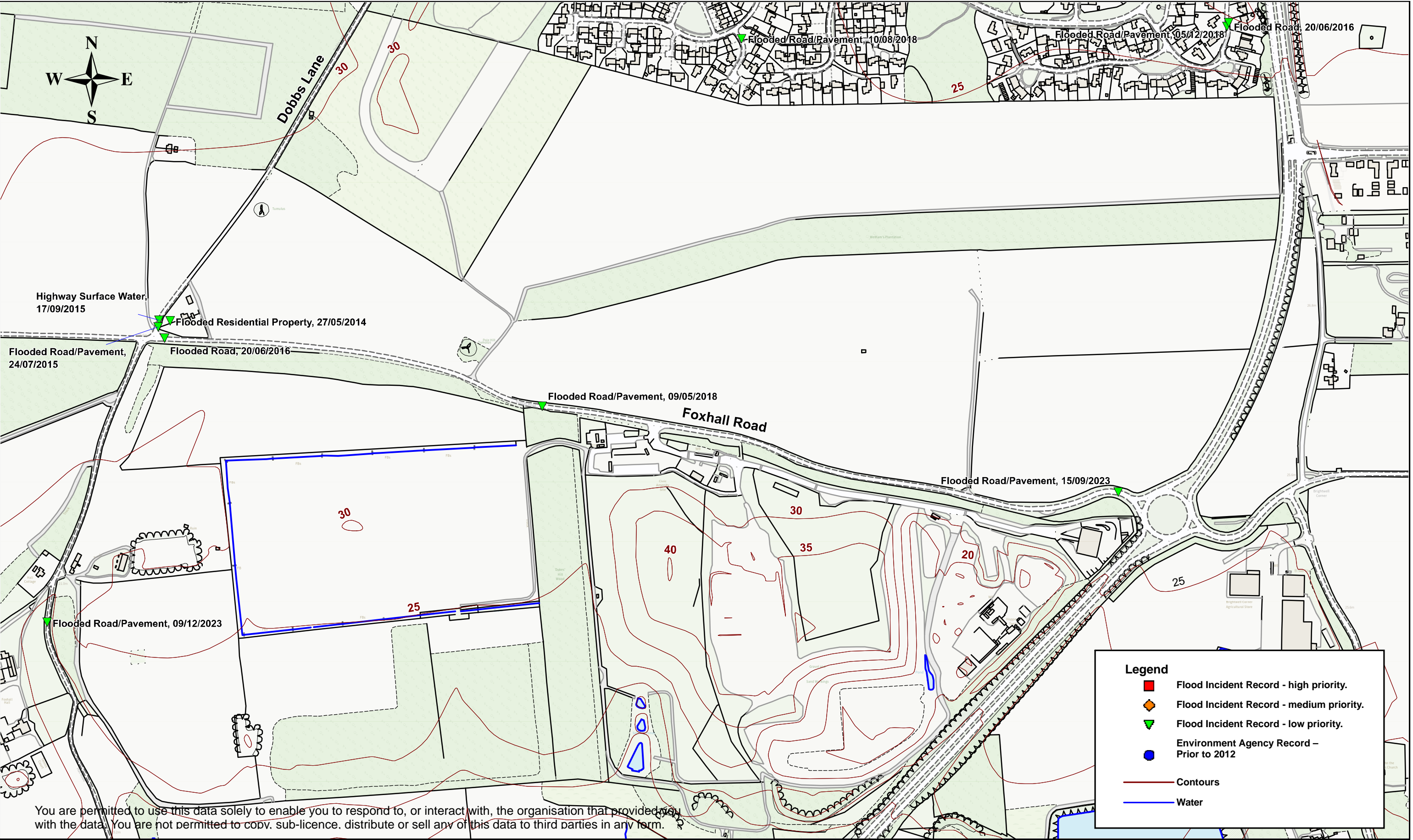
- expectations of the individuals concerned about personal information being put into the public domain;

- reasonable expectations - the data subjects concerned would have a legitimate expectation of privacy concerning their personal information and would not have anticipated this being put into the public domain;
- whether or not the requested information could be anonymised; and
- balancing the individual's rights and the legitimate interests - In past cases the Information Commissioner has weighed the individual's rights to privacy against the public interest in disclosure. There is no presumption in favour of releasing personal data.

This is an absolute exemption, which means that if the condition is satisfied there is no additional public interest test to consider.

In assessing fairness, the Council considered the likely consequences of disclosure of the requested information. Personal information should not be used in ways that have unjustified adverse effects on the individuals concerned. The council also considered whether such disclosure would be within the reasonable expectations of the individuals, given that any response to a request under the FOIA or EIR is deemed to be in the public domain. The council believes that in this instance it is not fair to disclose personal data and is therefore withholding the requested information under section 40 of the FOIA and regulation 13 of the EIR.







**Subject:** Foxhall Road Pre-App

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**From:** [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Sent:** 05 November 2025 12:18

**To:** [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Cc:** [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Subject:** Re: Foxhall Road Pre-App

Hi [REDACTED],

Many thanks, that is all excellent.

One thing to note is that even though this site wasn't allocated, the ISPA style transport policies are still in play. So, the development would need to fund ISPA style interventions (improvements or contributions) to suppress existing trip patterns in the Ipswich area to create sufficient 'headroom' for this site to come forward, way beyond simply mitigating direct traffic impacts.

I think [REDACTED] had some clauses in previous DM letters we could feed in, at an appropriate time.

Notwithstanding the ongoing issues with pooled contributions, which we're resolving through the KMC commission, and follow on work. KMC will obviously be aware of this, for this site!

Regards

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Sent:** 05 November 2025 11:58 AM

**To:** [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Cc:** [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Subject:** RE: Foxhall Road Pre-App

Hi All,

Please see draft comments on our current position on this proposal for sharing with ESC. Please let me know if you have any comments or input before I/we send it:

**Land North of Foxhall Road – proposed Bloor Homes development:**

Suffolk County Council as Local Highway Authority has engaged with the applicant's Transport Consultants and attended a number of meetings relating to the above proposal. The scope of information we have received to date is limited and subsequently, we are not in a position to provide any definitive comments on the proposal. However, we can provide comments on the information that we have received and discussed to date.

Sustainable Travel Connectivity – from the submitted information, we note that the site has significant constraints in this regard, particularly on the northern and western sides where key sustainable connectivity routes towards Ipswich, Kesgrave and Martlesham will be necessary to make the development acceptable. We have discussed the possibility of the use of Dobbs Lane as a sustainable travel corridor, however there are challenges related to this, and it is unlikely that this route in isolation would be sufficient to

make the development sufficiently sustainable in accordance with national policy and guidance. We are also keen to understand how existing off-site sustainable travel infrastructure will be improved and provision to enable access to existing sustainable travel infrastructure will be achieved in order to make the development acceptable.

Relationship with Brightwell Lakes - from the submitted information, we understand that secondary school provision would be provided by the permitted secondary school on Brightwell Lakes. However, we also understand that neither the delivery and the schedule for delivery of the proposed school have been confirmed. Subsequently, the proposal is very likely to need to provide suitable sustainable travel access to alternative secondary school provision, such as Kesgrave High School. There are also concerns around the use of a signalised crossing of the A12 by large numbers of secondary school pupils, firstly from a highway safety perspective, and secondly, the impact it would have upon A12/ Brightwell Lakes access junction traffic capacity as a result of frequent AM peak hour usage of the signalised crossing.

Traffic Impact – as a non – Local Plan allocated development site and based on the scale of development, there is likely to a significant impact upon the local and strategic highway network that has not been previously assessed as part of any Local Plan traffic assessment work. As part of the work to assess the impact with the SCTM (Suffolk County Transport Model), we have agreed on two sets of development trip generation rates, based upon how sustainable the development can be made. However, both rates would generate a significant number of new trips on the highway network and it is likely that local and strategic highway improvements will be necessary to mitigate the impact. This matter will also need to be considered with National Highways as it is likely to significantly impact upon their network.

Kind Regards

[REDACTED]

Principal Transport Development Planner

Suffolk County Council

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@suffolk.gov.uk>  
**Sent:** 05 November 2025 08:03  
**To:** [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>  
**Subject:** Re: Foxhall Road Pre-App

Hi [REDACTED],

Yes, that would be helpful, if you are able to do that without committing ourselves in a particular direction.

Thanks

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@suffolk.gov.uk>  
**Sent:** Wednesday, November 5, 2025 07:52  
**To:** [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>  
**Subject:** RE: Foxhall Road Pre-App

Hi [REDACTED],

I could provide a high level summary of our current position just setting out the sustainable travel connectivity challenges the site faces and where we are with the traffic impact assessment. Would just have to caveat it that based on the information we have to date, we cannot provide any definitive advice at this stage.

If that would be helpful, I'll draft something today?

Kind Regards

[REDACTED]

Principal Transport Development Planner

Suffolk County Council

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Sent:** 04 November 2025 17:05

**To:** [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Cc:** [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Subject:** Fw: Foxhall Road Pre-App

Hi [REDACTED],

I forwarded the meeting request to [REDACTED] and [REDACTED]. I will attend as well.

We met with the consultants developing the transport mitigation this morning, whilst it was a productive conversation we all agree the site has a number of challenges to overcome to make it acceptable in planning terms.

[REDACTED] - Are we in a position to provide any meaningful engagement response by Thursday? I would suggest we aren't anywhere near being able to put something in writing?

Thanks

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Sent:** Tuesday, November 4, 2025 09:25

**To:** [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED]

[REDACTED] <[REDACTED]@suffolk.gov.uk>

**Subject:** FW: Foxhall Road Pre-App

In addition to the invite that I have forwarded, [REDACTED] sent the following. Note highlighted

Best wishes


██████████  
██████████ MRTPI (he/him)  
Head of Planning  
Email: ██████████@suffolk.gov.uk  
Website: [www.suffolk.gov.uk](http://www.suffolk.gov.uk)

Suffolk County Council's Infrastructure Funding Statements are available: [click here](#).

The content of this email represents the informal opinion of the officer and is not binding upon the Council.

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**From:** ██████████ <██████████@eastsuffolk.gov.uk>  
**Sent:** 03 November 2025 20:06  
**To:** ██████████ <██████████@davidlock.com>; ██████████ <██████████@davidlock.com>  
**Cc:** ██████████ <██████████@DavidLock.com>; ██████████ <██████████@DavidLock.com>; ██████████  
<██████████@eastsuffolk.gov.uk>; ██████████ <██████████@eastsuffolk.gov.uk>; ██████████  
<██████████@suffolk.gov.uk>; ██████████ <██████████@bloorhomes.com>; ██████████  
<██████████@bloorhomes.com>; ██████████ <██████████@eastsuffolk.gov.uk>  
**Subject:** RE: Foxhall Road Pre-App

 **EXTERNAL EMAIL:** Don't click any links or open attachments unless you trust the sender and know the content is safe. [Read more information](#) for help from Suffolk IT

Hi ██████████

Thanks.

I've forward it to:

██████████  
██████████ (Highways)  
██████████ (LLFA)  
██████████ (SCC S106)  
██████████ (Specialist Services Manager/Design and Landscape)  
██████████ (Ecology)  
██████████ (Policy/Cycling and Walking)  
██████████ (Major Sites Planner)

Please could you confirm that you will send all relevant material and engagement responses by midday this Thursday so that we have a week to review that and best inform any advice we are able to give in the meeting?

Kind regards

██████████

██████████ MRTPI  
**Head of Planning and Building Control**  
East Suffolk Council  
██████████

*Please note that due to meetings I am often unable to answer calls, instead of leaving a voicemail please feel free to send me a text message as I can often react to those quicker.*

**Our latest Planning, Building Control and Coastal Management Newsletters can be viewed here: [Planning and Coastal Management Newsletters \(arcgis.com\)](#)**

[www.eastsuffolk.gov.uk](http://www.eastsuffolk.gov.uk)

[www.threecouncilsforsuffolk.org](http://www.threecouncilsforsuffolk.org)



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**From:** [REDACTED] <[REDACTED]@davidlock.com>

**Sent:** 29 October 2025 20:51

**To:** [REDACTED] <[REDACTED]@eastsuffolk.gov.uk>; [REDACTED] <[REDACTED]@davidlock.com>

**Cc:** [REDACTED] <[REDACTED]@DavidLock.com>; [REDACTED] <[REDACTED]@DavidLock.com>; [REDACTED] <[REDACTED]@eastsuffolk.gov.uk>; [REDACTED] <[REDACTED]@eastsuffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@bloorhomes.com>; [REDACTED] <[REDACTED]@bloorhomes.com>

**Subject:** RE: Foxhall Road Pre-App

Thanks [REDACTED]

I have sent an invite but would be really grateful if you and [REDACTED] could forward it to the other officers and if you could please confirm who will be attending.

Many thanks

[REDACTED]  
Senior Associate

+44 (0) 1908 666276

✉ [REDACTED]@davidlock.com

💻 davidlock.com



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**From:** [REDACTED] <[REDACTED]@eastsuffolk.gov.uk>

**Sent:** 29 October 2025 18:27

**To:** [REDACTED] <[REDACTED]@davidlock.com>; [REDACTED] <[REDACTED]@davidlock.com>

**Cc:** [REDACTED] <[REDACTED]@DavidLock.com>; [REDACTED] <[REDACTED]@DavidLock.com>; [REDACTED] <[REDACTED]@eastsuffolk.gov.uk>; [REDACTED] <[REDACTED]@eastsuffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Subject:** RE: Foxhall Road Pre-App

Hi [REDACTED]

Thanks.

I think we should pick everything up to initiate with key invites on 13<sup>th</sup>.

[REDACTED] has responded to me today and LLFA, Highways and SCC Planning/developer contributions.

Can you please send an invite.

Kind regards

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@davidlock.com>

**Sent:** 29 October 2025 18:16

**To:** [REDACTED] <[REDACTED]@eastsoffolk.gov.uk>; [REDACTED] <[REDACTED]@davidlock.com>

**Cc:** [REDACTED] <[REDACTED]@DavidLock.com>; [REDACTED] <[REDACTED]@DavidLock.com>; [REDACTED]

[REDACTED] <[REDACTED]@eastsoffolk.gov.uk>; [REDACTED] <[REDACTED]@eastsoffolk.gov.uk>

**Subject:** RE: Foxhall Road Pre-App

Hi [REDACTED],

Thanks again for the dates below, please could we confirm the 13<sup>th</sup> November as a 'key issues' pre-app session.

We appreciate and look forward to engaging with the other officers you mention and support your proposition to include them. Thinking about the items we need to run through I wonder if it might work to do the following:

- 13<sup>th</sup> November – key issues and connectivity, and involve SCC (subject to their availability). We are thinking primarily highways, but we are also keen for an education discussion and have reached out to [REDACTED] (but haven't heard back yet), so perhaps there is always the potential to combine the two; and
- 18<sup>th</sup> November – session more focused on GI, ecology and drainage with the LLFA.

Kind regards

[REDACTED]

Senior Associate

+44 (0) 1908 666276

[REDACTED]@davidlock.com

davidlock.com

[REDACTED]

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50 North Thirteenth Street | Central Milton Keynes | MK9 3BP



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**From:** [REDACTED] <[REDACTED]@eastsoffolk.gov.uk>

**Sent:** 26 October 2025 22:35

**To:** [REDACTED] <[REDACTED]@davidlock.com>

**Cc:** [REDACTED] <[REDACTED]@DavidLock.com>; [REDACTED] <[REDACTED]@davidlock.com>; [REDACTED]

Collier <[REDACTED]@DavidLock.com>; [REDACTED] <[REDACTED]@eastsoffolk.gov.uk>; [REDACTED]

<[REDACTED]@eastsoffolk.gov.uk>

**Subject:** RE: Foxhall Road Pre-App [Filed 27 Oct 2025 18:33]

Hi [REDACTED]



Thanks for the email. It was great to spend the day with [REDACTED] and I got to show him the site and some of the specific challenges it presents. On resource we will have a new Principal level contractor joining in the first week of December. This will either allow them to be assigned to this pre-app or free up other capacity in the team for it, more likely to be the latter.

Looking at diaries, and given we would like a number of our officers at the next meeting, including [REDACTED] (Specialist Services Manager) and [REDACTED] (Principal Ecologist) the following dates are the earliest we can offer.

11<sup>th</sup> Nov – 13.00-15.00 (Without me)

13<sup>th</sup> Nov – 09.15-11.00

18<sup>th</sup> Nov – 13.00-15.00 (Without me)

19<sup>th</sup> Nov – 11.00-13.00

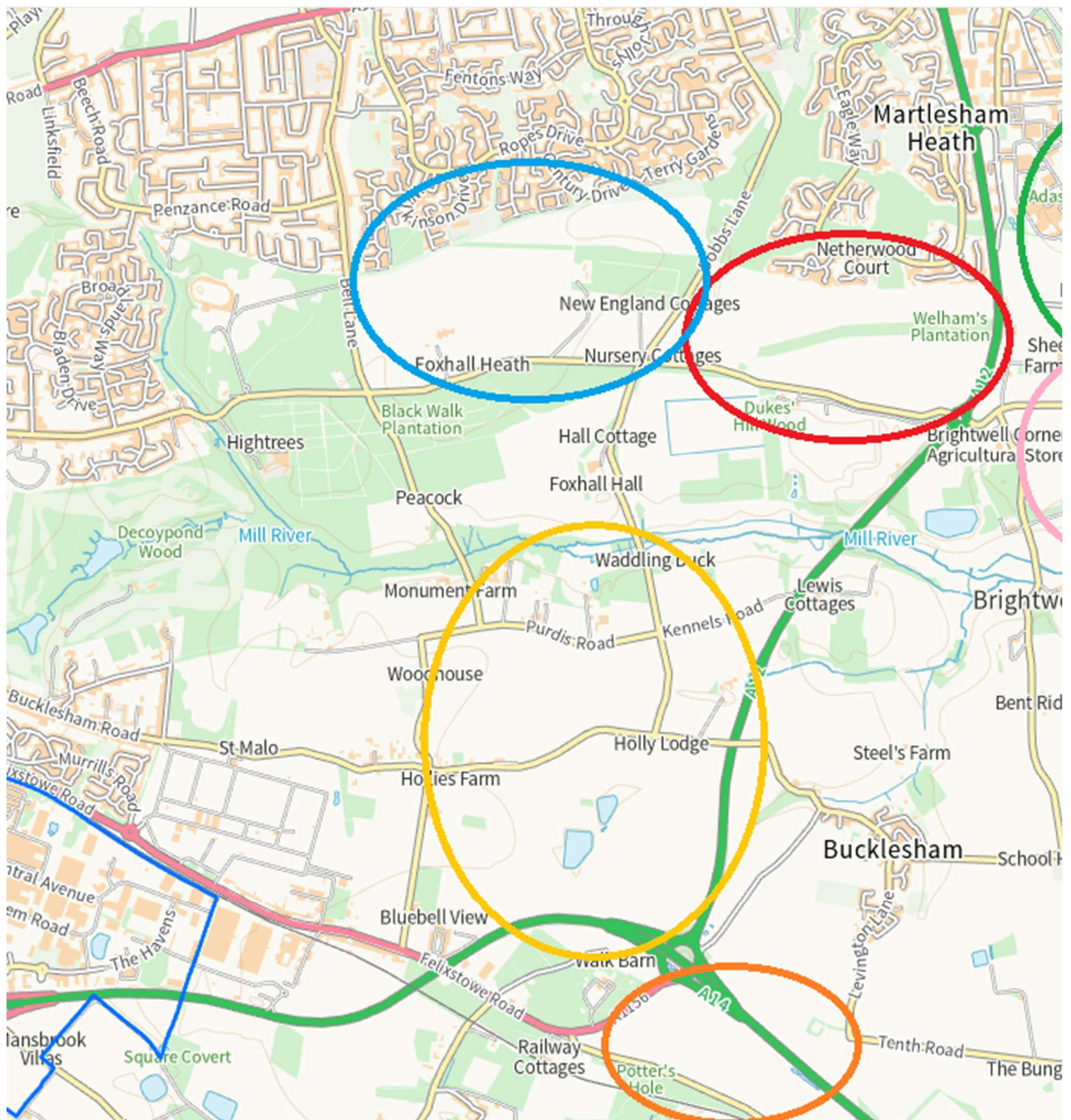
We've not checked the availability of officers at SCC yet but a Highways and LLFA presence would be worthwhile.

I'm not entirely sure what is meant by 3 months since the last pre-app meeting, which was on 4<sup>th</sup> Sept. I've added notes to the attached.

Hopefully EIA scoping should be live tomorrow.

I very much look forward to seeing feedback from you on our previous advice, the necessary evolution of plans and the feedback from public engagement. Any written feedback you have from consultees, such as SCC, NE, HE etc would be most helpful sooner rather than later please and we may also gain some of this directly from them.

This week we'll also be reaching out to landowners/promoters/agents for the following areas for a collective Teams call as part of the call for site process, with an aim for that to take place in November.



Kind regards

█

**MRTPI**

**Head of Planning and Building Control**

East Suffolk Council

█

*Please note that due to meetings I am often unable to answer calls, instead of leaving a voicemail please feel free to send me a text message as I can often react to those quicker.*

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[www.eastsuffolk.gov.uk](http://www.eastsuffolk.gov.uk)

[www.threecouncilsforsuffolk.org](http://www.threecouncilsforsuffolk.org)



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**From:** [REDACTED] <[REDACTED]@davidlock.com>

**Sent:** 23 October 2025 15:21

**To:** [REDACTED] <[REDACTED]@eastsuffolk.gov.uk>

**Cc:** [REDACTED] <[REDACTED]@DavidLock.com>; [REDACTED] <[REDACTED]@davidlock.com>; [REDACTED] <[REDACTED]@DavidLock.com>; [REDACTED] <[REDACTED]@eastsuffolk.gov.uk>

**Subject:** Foxhall Road Pre-App

Afternoon [REDACTED]

I hope you're well. Great news to see the Call for Sites is now up and running, a significant milestone, particularly given the challenges of coordinating with the other authorities.

Appreciate you have spoken to [REDACTED] on engagement going forward and we do understand the current resource challenges but I wanted to follow up so that we can get some dates agreed now.

As you know, Bloor remain keen to engage constructively and have refined their programme accordingly following the earlier ESC advice, however, they are keen to undertake this engagement asap to maintain momentum following the public consultation and to align with the now submitted EIA Scoping. The hope is to consolidate all of the feedback and inform any evolution of the scheme in a coordinated manner.

We are coming under pressure from Bloor to programme in pre-app discussions. As we have previously agreed with you, we want to discuss the headline ESC issues as a priority. We are preparing a pack to aid this discussion and would be grateful if you could confirm whether the **4<sup>th</sup> or 5<sup>th</sup> November** would suit for an ESC meeting combined with SCC (and potentially IBC)?

As we discussed, given we are nearly 3 months since our last pre-app, we need to reach out to technical officers. We had hoped that a workshop approach with slots for different themes would provide the most efficient way of doing this for ESC, but as this may become too difficult to coordinate, it may be easier to contact officers individually.

Unless it causes significant resource challenges, we would be grateful to start setting up calls with ESC officers (as set out on the attached updated Engagement Strategy). We can start to put these in the diary and ensure to invite you and [REDACTED] or alternatively if it is still possible, get a date in for the workshop as originally planned.

In parallel, we will also continue to engage with County on transport, education and minerals and waste and other statutory consultees. We understand that the LLFA requires ESC to request their input into pre-app – and so we would also be grateful for your assistance in coordinating a session with County in this regard.

Please could you also confirm that the EIA scoping is valid with consultation underway?

Many thanks

██████████

PS. ██████████ says thanks for a very informative day with you.

████████████████████

Partner

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📱 ██████████

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**Subject:**

Foxhall Road Pre-App

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**From:** [REDACTED]

**Sent:** 06 November 2025 10:46

**To:** [REDACTED] <[REDACTED]@eastssuffolk.gov.uk>

**Cc:** [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>; [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Subject:** Foxhall Road Pre-App

Hi [REDACTED]

Please see my comments below on our current position on this proposal ahead of next week's meeting:

**Land North of Foxhall Road – proposed Bloor Homes development:**

Suffolk County Council as Local Highway Authority has engaged with the applicant's Transport Consultants and attended a number of meetings relating to the above proposal. The scope of information we have received to date is limited and subsequently, we are not in a position to provide any definitive comments on the proposal. However, we can provide comments on the information that we have received and discussed to date.

Sustainable Travel Connectivity – from the submitted information, we note that the site has significant constraints in this regard, particularly on the northern and western sides where key sustainable connectivity routes towards Ipswich, Kesgrave and Martlesham will be necessary to make the development acceptable. We have discussed the possibility of the use of Dobbs Lane as a sustainable travel corridor, however there are challenges related to this, and it is unlikely that this route in isolation would be sufficient to make the development sufficiently sustainable in accordance with national policy and guidance. We are also keen to understand how existing off-site sustainable travel infrastructure will be improved and provision to enable access to existing sustainable travel infrastructure will be achieved in order to make the development acceptable.

Relationship with Brightwell Lakes - from the submitted information, we understand that secondary school provision would be provided by the permitted secondary school on Brightwell Lakes. However, we also understand that neither the delivery and the schedule for delivery of the proposed school have been confirmed. Subsequently, the proposal is very likely to need to provide suitable sustainable travel access to alternative secondary school provision, such as Kesgrave High School. There are also concerns around the use of a signalised crossing of the A12 by large numbers of secondary school pupils, firstly from a highway safety perspective, and secondly, the impact it would have upon A12/ Brightwell Lakes access junction traffic capacity as a result of frequent AM peak hour usage of the signalised crossing.

Traffic Impact – as a non – Local Plan allocated development site and based on the scale of development, there is likely to be a significant impact upon the local and strategic highway network that has not been previously assessed as part of any Local Plan traffic assessment work. As part of the work to assess the impact with the SCTM (Suffolk County Transport Model), we have agreed on two sets of development trip generation rates, based upon how sustainable the development can be made. However, both rates would generate a significant number of new trips on the highway network and it is likely that local and strategic highway improvements will be necessary to mitigate the impact and provide capacity in accordance with ISPA style requirements. This matter will also need to be considered with National Highways as it is likely to significantly impact upon their network.

**The above comments are based on the limited information supplied to Suffolk County Council as Local Highway Authority and using the standards, guidance and policies relevant at that time.**

**The above advice does not bind Suffolk County Council on its response to any future planning applications or agreements.**

Kind Regards

[REDACTED]

Principal Transport Development Planner

Suffolk County Council

[REDACTED]



**Subject:** Land off Foxhall Road, Ipswich

---

**From:** [REDACTED] <[REDACTED]@suffolk.gov.uk>  
**Sent:** 20 August 2025 08:32  
**To:** [REDACTED] <[REDACTED]@hea-llp.com>; RM Archaeology Mailbox <archaeology@suffolk.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@hea-llp.com>; [REDACTED] <[REDACTED]@hea-llp.com>  
**Subject:** RE: Land off Foxhall Road, Ipswich

Dear [REDACTED],  
Thank you for getting in touch regarding this proposed geophysical survey.

Please can a WSI be sent to us ASAP given the intended start date.

[REDACTED] is the person you will need to speak to regarding the SAMs- his email is  
[REDACTED]@historicengland.org.uk

As I am sure you have picked up from your DBA, the presence of the SAMs alongside the fact that there is a wider suspected barrow cemetery within the survey area, along with high potential for other archaeological remains, means that this archaeology contained within this site is likely to represent a number of constraints to development.

So you are aware, geophysical survey on other sites in the area has had mixed results and had not always successfully identified all archaeological remains (and there have been issues with green waste spread as well). The DBA should also include a study of AP evidence as we have found on a number of occasions that additional features are visible which are not picked up by geophysics.

Best wishes,

[REDACTED]

[REDACTED]  
Senior Archaeological Officer


Suffolk County Council Archaeological Service,  
Bury Resource Centre,  
Hollow Road,  
Bury St Edmunds,  
IP32 7AY

Tel.: 01284 741232  
Mob: [REDACTED]  
Email: [REDACTED]@suffolk.gov.uk

Website: <http://www.suffolk.gov.uk/culture-heritage-and-leisure/suffolk-archaeological-service/>  
Suffolk Heritage Explorer: <https://heritage.suffolk.gov.uk>  
Twitter Page: [www.twitter.com/SCCArchaeology](http://www.twitter.com/SCCArchaeology)

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**From:** [REDACTED] <[REDACTED]@hea-llp.com>  
**Sent:** 15 August 2025 13:28  
**To:** RM Archaeology Mailbox <archaeology@suffolk.gov.uk>  
**Cc:** [REDACTED] <[REDACTED]@hea-llp.com>; [REDACTED] <[REDACTED]@hea-llp.com>  
**Subject:** Re: Land off Foxhall Road, Ipswich

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Hi [REDACTED]

Thanks for getting back to me - there is no planning application as yet but I've attached the intended survey area.

Best wishes,

[REDACTED]

[REDACTED]  
Archaeology Director & Partner

t: 08081 641 288  
m: [REDACTED]  
t: 0203 544 2070  
w: [hea-llp.com](http://hea-llp.com)

On Fri, 15 Aug 2025 at 13:11, RM Archaeology Mailbox <[archaeology@suffolk.gov.uk](mailto:archaeology@suffolk.gov.uk)> wrote:

Good afternoon [REDACTED]

Thank you for your email,

Please could you provide a planning application number and a site location address.

Kind regards

[REDACTED]

[REDACTED]

Assistant Archaeological Officer (Technical Support)

Suffolk County Council Archaeological Service

Bury Resource Centre

Hollow Road

Bury St Edmunds

Suffolk IP32 7AY

Tel: 01284 741230

M: [REDACTED]

Email: [REDACTED]@suffolk.gov.uk

Website: <http://www.suffolk.gov.uk/archaeology>

Suffolk Heritage Explorer: <https://heritage.suffolk.gov.uk>

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**From:** [REDACTED] <[REDACTED]@hea-llp.com>

**Sent:** 15 August 2025 12:20

**To:** RM Archaeology Mailbox <[archaeology@suffolk.gov.uk](mailto:archaeology@suffolk.gov.uk)>

**Cc:** [REDACTED] <[REDACTED]@hea-llp.com>; [REDACTED] <[REDACTED]@hea-llp.com>

**Subject:** Land off Foxhall Road, Ipswich



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Hi all,

Hope you're doing well. We're instructed on a scheme at Foxhall Road east of Ipswich and have to date completed desk based reporting and have now been instructed for geophysical survey.

We have the geophysics lined up for August 26th at present although this depends on the farmer approving that timescale and confirming quad bike vs handheld survey. It will be Magnitude.

In the first instance, I wanted to let you know of the upcoming survey and that a WSI will be with you asap. If there is likely to be any issue with the survey date or WSI approval beforehand, I would appreciate if you could let me know.

Note that there are two SMs within the site so I'm trying to get hold of HE per a s42 license, they've suggested it would be [REDACTED] if you happen to have his direct email address that would be really helpful.

I will be on leave from COP today through to 28th August so my colleagues [REDACTED] and [REDACTED] are CCed in to help in the meantime.

Best wishes,

[REDACTED]

[REDACTED]  
Archaeology Director & Partner

t: 08081 641 288  
m: [REDACTED]  
t: 0203 544 2070  
w: [hea-llp.com](http://hea-llp.com)

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**Subject:**

Land off Foxhall Road, Ipswich Geophysics WSI.

---

**From:** [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Sent:** 26 August 2025 10:23

**To:** [REDACTED]@hea-llp.com

**Cc:** [REDACTED] <[REDACTED]@suffolk.gov.uk>

**Subject:** Land off Foxhall Road, Ipswich Geophysics WSI.

Hi [REDACTED]

The WSI for the geophysical survey is fine except that it needs to include reference to our requirements please [sccas-geophysical-survey-requirements](#).

All the best

[REDACTED]

[REDACTED]  
Archaeological Officer  
Suffolk County Council Archaeological Service  
Bury Resource Centre  
Hollow Road  
Bury St Edmunds  
Suffolk IP32 7AY  
Tel: 01284 741229  
Mob: [REDACTED]

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Website: <http://www.suffolk.gov.uk/archaeology>

Suffolk Heritage Explorer: <https://heritage.suffolk.gov.uk>

Suffolk County Council carried out surveys on Foxhall Road (grid reference 623755,244067) and Dobbs Lane (grid reference 623628,244875) in June 2023 recording volume and speed.

There were also a further 2 surveys, 1 in Dobbs Lane (grid reference 623766,245397) and 1 in Foxhall Road (grid reference 623552,244134) undertaken in June 2023 by a private survey company on behalf of Suffolk County Council as part of the Suffolk Model project. These surveys recorded volume and classification.

Data is normally supplied at a charge of £55.00 + VAT per set of data by contacting [trafficsurvey@suffolkhighways.org](mailto:trafficsurvey@suffolkhighways.org) Please see our page on SCC website for more information [Traffic surveys | Suffolk County Council](#)