CBRE SPUK III (No.45) Ltd Mersea Homes

Ipswich Core Strategy Examination

Hearing Statement Matter 5: Ipswich Garden Suburb

> 21 June 2016 Prepared by David Lock Associates

#### MATTER 5 – Ipswich Garden Suburb

#### 1.0 INTRODUCTION

- 1.01 This hearing statement is submitted on behalf of CBRE SPUK III (No.45) Ltd and Mersea Homes Ltd.
- 1.02 CBRE SPUK III (No.45) Ltd ('CBRE') is the owner of land south of the railway, west of Westerfield Road (excluding land controlled by Ipswich School)., and forming part of the Ipswich Garden Suburb. The land is subject to an allocation for residential-led development under Policy CS10 of the extant adopted Core Strategy (2010). It is known as the 'southern neighbourhood' or 'Fonnereau Village' under the terms of the emerging SPD for the Ipswich Garden Suburb ('IGS'). A planning application for this land was submitted in June 2014 and is likely to be determined in Autumn 2016.
- 1.03 Mersea Homes have a promotional agreement with CBRE SPUK III (No.45) Ltd, but separately own land to the east of Westerfield Road (forming the substantive part of the 'Eastern Neighbourhood' or 'Red House village' site). That land is proposed to be allocated for development under Policy CS10 as is now proposed by the Council in the Core Strategy now before the Inspector.
- 1.04 The extents of land under our clients' control is provided at Appendix 1.

### 2.0 CONTEXT

- 2.01 Both CBRE and Mersea Homes have been represented on the Ipswich Garden Suburb Steering Group since its inception in early 2012. Crest Nicholson and the Ipswich School the two other major landowners have also been represented.
- 2.02 During that time, all of the landowners have contributed to progressing the Ipswich Garden Suburb, including:
  - attending regular meetings with Ipswich Council and Suffolk Council;
  - contributing to the instruction of consultants commissioned by Ipswich Council to provide specialist advice;
  - contributing to and commenting upon materials prepared by consultants under the Council's instruction, including the draft SPD and emerging Infrastructure Delivery Plan;
  - sharing of information, including in relation to technical and other matters; and
  - contributing to discussions in relation to potential mechanisms for securing the delivery of relevant infrastructure.
- 2.03 CBRE submitted a hybrid planning application for land west of Westerfield Road in July 2014. The planning application sought outline planning permission for 735 dwellings, a district centre, a site for a primary school and green infrastructure. Full details were submitted in respect of the first phase of development comprising 80 dwellings (the overall number of dwellings is therefore 815, including those within the district centre). The planning application reflected the provisions of the draft Ipswich Garden Suburb SPD.
- 2.04 In January 2015 the detailed element of the planning application was withdrawn. The application now seeks outline permission for 815 dwellings, a district centre, a site for a primary school and green infrastructure.
- 2.05 Work has been ongoing in relation to specific ecological surveys and transport modelling, and further submissions are proposed within the next two months to allow determination of the planning application in autumn 2016.
- 2.06 Specifically, in relation to transport matters, CBRE have been working closely with Suffolk County Council to ensure that the transport model used to support the planning application provides a robust basis for informing the assessments of impacts. The County Council's technical work in relation to the Upper Orwell Crossing is being shared with the applicants in order to ensure consistent and comprehensive assessment of impacts.

- 2.07 Ongoing work in relation to viability indicates to the signatory parties that the schemes are unlikely to be viable when the full list of infrastructure and planning obligations requirements are taken into account, and therefore viability assessments are necessary. It is also unclear whether the schedule of infrastructure and planning obligations set out by Ipswich Council are Regulation 122 and 123 compliant<sup>1</sup>.
- 2.08 It is also apparent to the signatory parties that the Council's proposed Framework Agreement (which is proposed to bind up to 13 parties into a single legal agreement to deliver relevant infrastructure) is unlikely to be realised. It is the view of the signatory parties that in order to enable any development to proceed an alternative solution is required.
- 2.09 Alongside amendments to relevant local plan policies (for example in relation to matters subject to planning obligations), the proposed amendments to Tabe 8B set out below provide an alternative mechanism for the delivery of strategic infrastructure in a coordinated and comprehensive manner without the need for relevant parties to sign legally binding agreements prior to their specific development area coming forward. The signatory parties consider this approach to be an approach to provide a flexible yet certain process to deal with a development horizon potentially in excess of 15 years, and one which will avoid significant delays in bringing forward any development on the IGS.
- 2.10 It will be necessary to confirm that strategic infrastructure items are financially viable in relation to each neighbourhood.

## 3.0 RESPONSE TO THE INSPECTOR'S QUESTION

Question 5.1: Having particular regard to the following, are the policies and proposals for Ipswich Garden Suburb soundly based? Traffic and transport; Other infrastructure and services; air quality; fresh and waste water and flooding; landscape and nature conservation; realistic delivery during the plan period; the flexibility of policy requirements. If you contend that the policies and proposals are not how should they be modified?

- 3.01 We believe that the identification of the Ipswich Garden Suburb as a location for an urban extension to Ipswich is soundly based. It is a sustainable location capable of delivering sustainable development, under the terms of the National Planning Policy Framework. We do not consider that any of the technical matters identified by the Inspector represents a barrier to development.
- 3.02 We do consider, however, that Policy CS10 and Table 8b, as currently proposed, fail to provide a sound basis for allowing the Ipswich Garden Suburb to be delivered in a timely way. They are not effective (since they will not provide deliverable outcomes), neither is the detail set out supported by evidence. Our particular concerns relate to the mechanism for delivering development and the extent to which detailed matters which are appropriately addressed in the SPD are sought to be established in CS10.

## Policy CS10

- 3.03 Policy CS10 sets out to allocate around 195 hectares of land for residential-led development. The land is within multiple ownerships, and four of those (who between them control the majority of the land within the IGS) have been working collaboratively since early 2012 to help bring forward a policy framework and delivery mechanism to guide development.
- 3.04 The IGS SPD, adopted as interim guidance by the Council in September 2014, provides a detailed narrative in relation to the type and quantum of land uses proposed, its spatial distribution, and in relation to the urban design aspirations for the IGS. If the core strategy is adopted, the SPD will be afforded greater weight in planning terms.

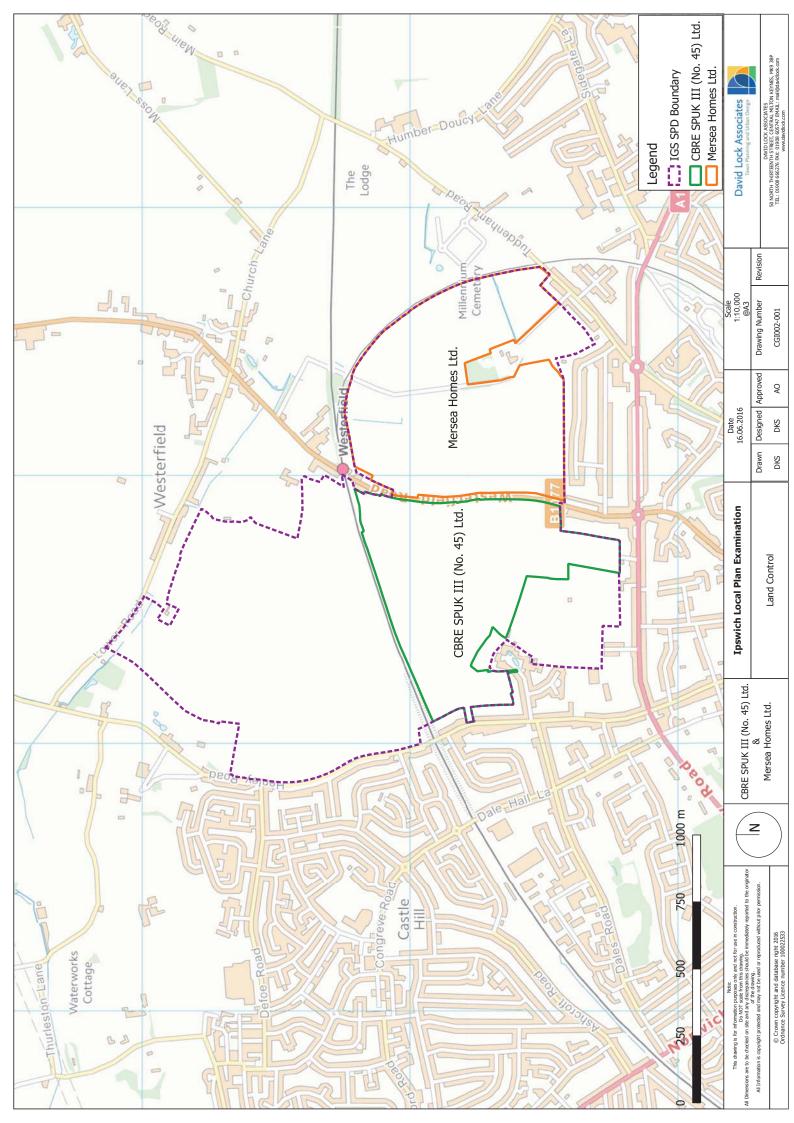
<sup>&</sup>lt;sup>1</sup> Regulations 122 and 123 of the Community Infrastructure Levy Regulations 2010 (No.948)

- 3.05 In our view, the function of Policy CS10 should be to:
  - identify land forming part of the IGS and set out the justification for that allocation;
  - identify the land uses which should form part of the proposal;
  - identify strategic infrastructure to serve development, and assign delivery to one of the neighbourhoods; and
  - provide a basis by which the IGS SPD will guide the delivery of the IGS by means of individual planning applications.
- 3.06 At present, Policy CS10 does these things, but adds a further layer of detail which is unnecessary and which reduces flexibility which is provided by the SPD and the provisions of current and future planning applications. In particular, Policy CS10 sets out unnecessary detail in relation to detailed land use quantum, and the provisions of Table 8B further amplify this unnecessary detail.
- 3.07 Our proposed changes to Policy CS10 are provided at Appendix 2.
- 3.08 We specifically recommend that the proposals map is amended to identify the boundary of the IGS alone, with no further land use annotations applied.
- 3.09 We also consider that the preamble to Policy CS10 fails to reflect the importance of the IGS as a component of the spatial strategy and has not been updated to reflect the present context. For example, we consider the 'Northern Fringe' terminology used in paragraph 8.104 is out of date, and that the provisions of paragraph 8.106 and 8.107 are unnecessary.

#### Table 8B

- 3.10 Table 8b provides for infrastructure requirements to serve the IGS. We consider it vital that there is certainty and clarity in relation to responsibilities for securing new infrastructure, and that the comprehensive delivery of the IGS requires equitable contribution towards that infrastructure. In our view, that is best served by assigning infrastructure to each neighbourhood, recognising the likely sequence of development and the geography of each component of the IGS. To that end, in order to ensure that Policy CS10 (as the parent policy to Table 8b) is effective, the 'strategic' infrastructure elements are assigned to specific neighbourhoods.
- 3.11 Our proposed replacement Table 8b is set out in Appendix 3. It provides for Strategic infrastructure, separately tabulated by IBC, to be assigned to each neighbourhood and is highlighted in a bold typeface. The purpose of the amendment is to ensure that each item of strategic infrastructure has a clear relationship with a given neighbourhood and that responsibility for delivery is unambiguous. Amendments have also been made to the narrative on each infrastructure item to provide increased flexibility, recognising the role of the SPD and emerging work commissioned by the Council in relation to the Infrastructure Delivery Plan.
- 3.12 It is hoped that a Statement of Common Ground can be agreed between relevant parties in relation to Table 8B. Our proposals in relation to Table 8B are therefore subject to amendment should common ground be secured. It is our intention to submit an agreed Statement of Common Ground at the earliest opportunity in advance of he Hearing session for Matter 5.

Appendix 1: Land in the control of CBRE SPUK III (No.45) Ltd and Mersea Homes Ltd



## Appendix 2: Proposed amendments to Policy CS10.

### POLICY CS10: IPSWICH GARDEN SUBURB

Land at the northern fringe of Ipswich, which is referred to as Ipswich Garden Suburb, will form a key component of the supply of housing land in Ipswich during the plan period <del>due to the limited</del> <del>availability of previously developed land</del>.

The site, identified on the policies map, consists of 195ha of land which will be developed <u>has</u> <u>been planned</u> comprehensively as a garden suburb of three neighbourhoods: <u>a Northern Henley</u> <u>Gate</u> neighbourhood (east of Henley Road and north of the railway line), <u>a Southern Fonnereau</u> neighbourhood (west of Westerfield Road and south of the railway line) and <u>an Eastern Redhouse</u> neighbourhood (east of Westerfield Road). Over the plan period, the site <u>will</u> <u>is expected to</u> deliver land uses as set out below:

Anticipated Land use	Approximate area in hectares
Public open space and ecological corridors	40
A Country Park (additional to the public open	24.5 (minimum)
space above) including a visitor centre	
Residential development of approximately up	102
<u>to</u> 3,500 dwellings	
A District Centre located within Fonnereau	3.5
<u>Neighbourhood</u> providing:	
i. A maximum of 2,000 sq m net of	
convenience shopping, to <u>which may</u>	
include a medium/large supermarket	
between 1,000 and 1,700 sq m net;	
ii. Up to 1,220 sq m net of comparison	
shopping;	
iii. Up to 1,320 sq m net of services	
uses including non-retail Use Class	
A1, plus A2 to A5 uses; iv. Supporting uses which may include A	
health centre;	
<del>v.</del> A library;	
vi. A police office;	
<del>vii.</del> A multi-use community centre; and	
viii. Appropriate residential	
accommodation in the form of upper floor	
apartments.	
Two Local Centres <i>located in Henley Gate</i>	1.5 including 0.5ha per
and Redhouse neighbourhoods together	local centre in the Northern and Eastern
providing:	neighbourhoods and 0.5ha
i. Up to 500 sq m net of convenience	within the Northern neighbourhood for the
retail floorspace	country park visitor centre/ community centre.
ii. Up to 600 sq m net of comparison	
retail floorspace; and iii. Up to 500 sq m net of service uses	
including non-retail Use Class A1, plus	
Classes A2 to A5.	
iv Community Centre located in Henley Gate	
A reserve site for a secondary school within	9
the Eastern <u>Redhouse</u> neighbourhood	
Three <u>reserve sites for primary schools (one</u>	<del>6</del>
<u>in each neighbourhood)</u>	

Primary road infrastructure, including a road	8.5
bridge over the railway to link the Northern	
and Southern neighbourhoods	
Total	<del>195</del>

The broad distribution of land uses is indicated on the policies map <u>will be agreed via a</u> <u>masterplan SPD to be adopted by the Council</u>. The detailed <u>anticipated</u> strategic and neighbourhood infrastructure requirements for the development and the triggers for their delivery are included in Table 8B in Chapter 10.

Future planning applications for the site shall be supported by an Infrastructure Delivery Plan based on the identified infrastructure requirements set out in Table 8B. The Infrastructure Delivery Plan shall set out in more detail how the proposed development and identified strategic and neighbourhood infrastructure will be sequenced and delivered within the proposed schemes.

A *draft* supplementary planning document has been prepared to:

- a. guide the development of the whole Ipswich Garden Suburb area;
- amplify the infrastructure that developments will need to deliver on a comprehensive basis alongside new housing, including community facilities and, at an appropriate stage, the provision of a railway crossing to link potential development phases, in the interests of sustainability and integration;
- c. identify the detailed location of a district and two local centres and other supporting infrastructure; and
- d. provide guidance on the sequencing of housing and infrastructure delivery required for the development

Development proposals will be required to demonstrate that they are in accordance with the <u>have</u> <u>taken into account the</u> SPD. They should positively facilitate and not prejudice the development of other phases of the Ipswich Garden Suburb area and meet the overall vision for the <u>comprehensive development</u> of the area as set out in the SPD.

Any development will maintain <u>The SPD demonstrates how</u> an appropriate physical separation of Westerfield village from Ipswich <u>can be maintained</u> and include green walking and cycling links to Westerfield station, and provide the opportunity for the provision of a country park as envisaged by CS16 and is more particularly identified in the SPD.

The land to the west of Tuddenham Road north of the railway line is allocated for the replacement playing fields necessary to enable development of the *Fonnereau neighbourhood*. Ipswich School playing field site as part of the Garden Suburb development.

#### Appendix 3: Replacement Table 8B

Without prejudice in relation to any statement of Common Ground in relation to this matter

TABLE 8B Neighbourhood S106 / Infrastructure requirements for the Ipswich Garden Suburb (see policy CS10 Ipswich Garden Suburb)

## Fonnereau Neighbourhood Infrastructure

The Infrastructure and planning obligations below will be the responsibility of the developer of the particular neighbourhood to deliver at the appropriate time as set out in the table below.

Strategic infrastructure necessary to make the neighbourhood sustainable is identified in bold typeface and will take precedent over other infrastructure items on this list. Other provisions (not emboldened) will be

Non-'bold' text in the table is anticipated to be appropriate subject to viability.

Note that dwelling numbers apply to the total number in this neighbourhood alone.

Infrastructure theme	Infrastructure item	Description and trigger point for delivery
Access & transport	Phased delivery of bus services & bus priority measures.	Establishing bus services and bus priority measures to be secured at an appropriate stage in the development.
	Completion of Fonnereau Neighbourhood Primary Street to Vehicular Bridge crossing point	Primary Street linking Westerfield Road to the location of the vehicular bridge crossing point to be in use by the 400 <sup>th</sup> occupation
	Improvements to town centre & east-west footpaths/cycleways linkages.	Delivery of improvements in agreement with SCC Highways to be secured at an appropriate stage in the development comprising improvements to crossing facilities and key routes to the town centre.
	Improvements to Westerfield Station access.	Contribution towards car & cycle parking provision and pedestrian access will be secured at an appropriate stage in the development.
	Controlled cycle / pedestrian crossing improvements on Westerfield Road.	Delivery of improvements to be secured at an appropriate stage in the development.
	Traffic management scheme for Westerfield village, The Crofts and other locations.	Details of scheme to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department and financial contribution secured at an appropriate stage in the development.
	Off-site junction improvements in surrounding road network.	Timetable for delivery to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department but is likely to include improvements to Westerfield Rd / Valley Road Junction

	Connection to the Urban Traffic Management & Control (UTMC) system.	Timetable for delivery to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department and financial contribution secured at an appropriate stage in the development.
	Travel Plan development, implementation & monitoring.	Travel Plan to be submitted and agreed with SCC Highways department as part of planning application. To be implemented and monitored during the development.
	Improvements to Fonnereau Way (complete section linking Valley Road & railway line).	Prior to occupation of 500 dwellings and taking into account any amendments to the Right of Way network as a consequence of the proposed closure of the Fonnereau Way rail crossing by Network Rail
	Pedestrian and cycle signage (monoliths).	Contributions to be secured at an appropriate stage in the development.
Education	Secondary school provision	Phased contributions shall be secured throughout each stage of the development.
	Primary school site with the potential for some facilities to be shared with the community.	Serviced site (with access roads) to be offered for transfer prior to occupation of 200 dwellings. The need and timetable for the provision of a second form of entry will be reviewed following this.
		Phased contributions shall be secured at an appropriate stage in the development taking account any provision of serviced land.
Open space, recreation & play	Neighbourhood parks & open space	Including allotments, equipped sports and play facilities to be secured at an appropriate stage in the development.
	Swimming contribution (off- site)	Contributions to be secured at an appropriate stage in the development.
Community facilities	District Centre including community buildings with	To be secured at an appropriate stage in the development
	integrated uses (where required) e.g. library facilities, police office, health centre & reserved sites for community use.	Temporary community centre to be provided prior to occupation of 50 dwellings. Permanent community centre with integrated facilities prior to occupation of 500 dwellings.
	Funding for community development support officer(s).	To be secured at an appropriate stage in the development
Other items	Household waste facilities	Contributions to be secured at an appropriate stage in the development.
	Superfast broadband infrastructure.	To be delivered in each phase of development in neighbourhood.

## Henley Gate Neighbourhood Infrastructure

The Infrastructure and planning obligations below will be the responsibility of the developer of the particular neighbourhood to deliver at the appropriate time as set out in the table below.

Strategic infrastructure necessary to make the neighbourhood sustainable is identified in bold typeface and will take precedent over other infrastructure items on this list. Other provisions (not emboldened) will be

Non 'bold' text in the table is anticipated to be appropriate subject to viability.

Note that dwelling numbers apply to the total number in this neighbourhood alone.

Infrastructure theme	Infrastructure item*	Description and trigger point for delivery*
Access & transport	Vehicular/cycle/foot Bridge over railway line.	Prior to the occupation of 300 dwellings in Henley Gate or as agreed with Ipswich Borough Council (IBC) in view of the sequencing of both Fonnereau Village and Henley Gate.
	Fonnereau Way cycle / pedestrian bridge across rail line.	Prior to the occupation of 300 dwellings in Henley Gate or as agreed with Ipswich Borough Council (IBC) in view of sequencing of both Fonnereau Village and Henley Gate, taking into account any amendments to the Right of Way network as a consequence of the proposed closure of the Fonnereau Way rail crossing by Network Rail.
	Phased delivery of bus services & bus priority measures.	Extension of service to serve neighborhood including bus priority measures within the neighbourhood to be secured at an appropriate stage in the development.
	Traffic management scheme for Westerfield village, The Crofts and other locations.	Additional provisions as may be required with details of scheme to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department and financial contribution secured at an appropriate stage in the development.
	Off-site junction improvements in surrounding road network.	Additional improvements with timetable for delivery to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department but is likely to include improvements to Henley Road/Dale Hall Lane/Valley Road Junctions
	Connection to the Urban Traffic Management & Control (UTMC) system.	Timetable for delivery to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department and financial contribution secured at an appropriate stage in the development.
	Travel Plan development, implementation & monitoring.	Travel Plan to be submitted and agreed with SCC Highways department as part of the planning application. To be implemented and monitored during the development.
	Improvements to Fonnereau Way (complete section linking railway line and Lower Road).	Prior to occupation of 500 dwellings and taking into account any amendments to the Right of Way network as a consequence of the proposed closure of the Fonnereau Way rail crossing by Network Rail

	Pedestrian and cycle signage (monoliths).	Contributions to be secured at an appropriate stage in the development.
Education	Secondary school provision	Phased contributions shall be secured throughout each stage of the development.
	Primary school site with the potential for some facilities to be shared with the community.	Serviced site (with access roads) to be transferred prior to occupation of 200 dwellings. The need and timetable for the provision of a second form of entry will be reviewed following this. Phased contributions shall be secured at an appropriate stage in the development taking account any provision of
Open space, recreation & play	Country Park with visitor centre.	serviced land. Phasing for tree planting and landscaping to be agreed and commenced at an early stage in the development of Henley Gate.
		Completion and land transfer of initial ancillary works to include visitor facility centre and works compound prior to the occupation of 500 dwellings. Capital and maintenance contributions (or in-kind provision by the Henley Gate developer) and transfer of the remaining land will be secured at an appropriate stage in the development.
	Swimming contribution (off-site)	Contributions to be secured at an appropriate stage in the development
	Neighbourhood parks & open space	Including allotments, equipped sports and play facilities to be secured at an appropriate stage in the development.
Community facilities	Local Centre including community buildings with integrated uses (where required) e.g. library facilities, police office, health centre & reserved sites for community use.	To be secured at an appropriate stage in the development Temporary community centre to be provided prior to occupation of 50 dwellings. Permanent community centre with integrated facilities prior to occupation of 500 dwellings.
	Funding for community development support officer(s).	Contributions to be secured on commencement of early phases of development to ensure officer(s) in post prior to first dwelling occupation.
Other items	Household waste facilities	Contributions to be secured at an appropriate stage in the development.
	Superfast broadband infrastructure.	To be delivered in each phase of development in neighbourhood.

# **Redhouse Neighbourhood Infrastructure**

The Infrastructure and planning obligations below will be the responsibility of the developer of the particular neighbourhood to deliver at the appropriate time as set out in the table below.

Strategic infrastructure necessary to make the neighbourhood sustainable is identified in bold typeface and will take precedent over other infrastructure items on this list. Other provisions (not emboldened) will be

Non 'bold' text in the table is anticipated to be appropriate subject to viability.

Note that dwelling numbers apply to the total number in this neighbourhood alone.

Infrastructure theme	Infrastructure item*	bescription and trigger point for delivery
Access & transport	Phased delivery of bus services & bus priority measures.	Extension of service to serve neighbourhood including bus priority measures within neighbourhood to be secured at an appropriate stage in the development.
	Improvements to Westerfield Station access.	Additional contribution towards car & cycle parking provision and pedestrian access will be secured at an appropriate stage in the development.
	Controlled cycle / pedestrian crossing improvement on Westerfield Road.	Additional improvements to be secured at an appropriate stage in the development.
	Traffic management scheme for Westerfield village, The Crofts and other locations.	Additional provisions may be required with details of scheme to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department and financial contribution secured at an appropriate stage in the development.
	Off-site junction improvements in surrounding road network.	Additional provisions with timetable for delivery to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department.
	Connection to the Urban Traffic Management & Control (UTMC) system.	Timetable for delivery to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department.
	Travel Plan development, implementation & monitoring.	Travel Plan to be submitted and agreed with SCC Highways department as planning application. To be implemented and monitored during the development.
	Pedestrian & cycle signage (monoliths).	Contributions to be secured at an appropriate stage in the development.

Education	Reserve site for up to 1200 space secondary school (including sixth form facility) providing playing fields and recreational facilities that would be secured for use by the community.	If SCC have not already secured a suitable location for additional Secondary School capacity then a serviced site (with access roads) to be offered for transfer prior to occupation of 100 dwellings. The need, size and timetable for the facility will be in agreement with SCC education department. Phased contributions shall be secured throughout each stage of the development taking account any provision of serviced land.
	Primary school site with the potential for some facilities to be shared with the community.	Serviced site (with access roads) to be offered for transfer prior to occupation of 200 dwellings. The need and timetable for the provision of a second form of entry will be reviewed following this.
		Phased contributions shall be secured at an appropriate stage in the development taking account any provision of serviced land.
Open space, recreation & play	Swimming contribution (off-site)	Contributions to be secured at an appropriate stage in the development
	Neighbourhood parks & open space	Including allotments, equipped sports and play facilities to be secured at an appropriate stage in the development.
Community facilities	Local Centre including community buildings with integrated uses (where required) e.g. library facilities, police office, health centre & reserved sites for community use.	To be secured at an appropriate stage in the development Temporary community centre to be provided prior to occupation of 50 dwellings. Permanent community centre with integrated facilities prior to occupation of 500 dwellings.
	Funding for community development support officer(s).	Contributions to be secured on commencement of early phases of development to ensure officer(s) in post prior to first dwelling occupation.
Other items	Household waste facilities	Contributions to be secured at an appropriate stage in the development.
	Superfast broadband infrastructure.	To be delivered in each phase of development in neighbourhood.