

Ipswich Core Strategy Examination

Hearing Statement Matter 10: Transport and accessibility

1 June 2016

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MATTER 10 – Transport and accessibility

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 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 remains to be determined.
- 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.

2.0 RESPONSE TO THE INSPECTOR'S QUESTION

Question 10.1: Are the policies ... in connection with non-transport infrastructure/services and flooding soundly based? If you contend that they are not how should they be modified?

- 2.01 It is our view that policies CS15, CS16, and CS17 are not soundly based as considered against the provision of paragraph 182 of the National Planning Policy Framework ('NPPF'). We have consistently raised objection at previous stages of the plan making process, and do so again now. We consider that the proposed policies are variously:
- Not supported by adequate or appropriate evidence base (therefore not **justified**).
 - Not **effective** insofar as the policies will not provide deliverable outcomes.
 - Not **consistent with national planning policy** in relation to specific matters.
- 2.02 Each policy is dealt with in turn.

Policy CS15

- 2.03 Policy CS15 recognises that new education provision will be required within the Ipswich Garden Suburb. However, Policy CS10 provides for a single comprehensive policy dealing with the delivery of development and infrastructure. There is no benefit in duplicating such provision. The final sentence of Policy CS15 should therefore be amended as follows:

Education needs associated with development at the Ipswich Garden Suburb are identified, a secondary school site allocated and broad locations for primary schools safeguarded through policy CS10 of this plan and the policies map.

Policy CS16

- 2.04 Policy CS16 seeks to establish a requirement for new development to ameliorate existing open space deficiencies. Such an approach is contrary to the provisions of Regulation 122 of The Community Infrastructure Levy Regulations 2010 which requires planning obligations to be directly related to the development and fairly and reasonably related in scale and kind to the development. Clause (a) of Policy CS16 should be amended as follows:

a. requiring all developments to contribute to the provision of open space according to the Borough's standards and, identified strategic needs ~~and existing deficits in an area~~;

- 2.05 Clause (h) should, in light of the statement of Common ground agreed between the Council and Natural England, provide greater clarity in relation to the role and function of the proposed country park forming part of the IGS. Clause (h) of Policy CS16 should be amended as follows:

h. working with partners to support the delivery of mitigation measures identified in the Habitats Regulations Assessment including ~~ensure~~ the provision of a new country park and visitor centre within the Ipswich Garden Suburb, and an extension to Orwell Country Park and possible provision of a visitor facility there subject to assessing its impacts on the Special Protection Area;

Policy CS17

- 2.06 We remain concerned that there is insufficient clarity in respect of the potential roles of s.106 agreements and CIL in relation to infrastructure matters. Whilst the first schedule of categories of infrastructure can reasonably be associated with the s.106 process, key strategic infrastructure is by its nature less specific to individual developments, and thus more appropriately funded under CIL. Additional clarity should be established in the Policy to that effect. We recommend the following amendment:

Key strategic infrastructure requirements needed to deliver the objectives of the Core Strategy and for which CIL contributions may be sought include the following (not in priority order): ...

Policy DM29

- 2.07 We support the revised wording proposed in respect of Policy DM29.