## WRITTEN STATEMENT

# IPSWICH BOROUGH COUNCIL CORE STRATEGY AND POLICIES DPD REVIEW

EXAMINATION HEARING SESSIONS JUNE 2016

# MATTER 10 – NON-TRANSPORT RELATED INFRASTRUCTURE AND SERVICES AND FLOODING

PREPARED ON BEHALF OF CREST NICHOLSON

May 2016



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#### Prepared on behalf of Crest Nicholson

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Checked by:	HA
Authorised by:	HE

Barton Willmore LLP The Observatory Southfleet Road Swanscombe Kent DA10 0DF

Tel: 01322 374660 Fax: 01322 374661 Email: <u>huw.edwards@bartonwillmore.co.uk</u> Ref: 24013/A5/LN/djg Date: 31 May 2016

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### 1.0 INTRODUCTION

- 1.1 This Written Statement has been prepared on behalf of Crest Nicholson in respect of Matter
  10 of the Inspector's Stage 2 Matters and Questions for the Core Strategy and Policies DPD
  Review (CSP DPD Review).
- 1.2 Crest Nicholson has control of the northern parcel of Ipswich Garden Suburb (IGS) known as 'Henley Gate', which is allocated under Policy CS10 of CSP DPD for mixed-use development. An IGS Supplementary Planning Document (SPD) has been prepared by Ipswich Borough Council (IBC), and interim 'adoption' took place in September 2014. Full adoption of the SPD will not take place until the revised CSP DPD has been adopted. This Statement is prepared with due regard to the allocation of the Ipswich Garden Suburb (IGS) under Policy CS10 of the CSP DPD Review.
- 1.3 Crest Nicholson is in the process of preparing an Outline planning application for Henley Gate, which is due to be submitted in June 2016.
- 1.4 Matter 10 relates the soundness of the policies within the CSP DPD Review and Site Allocations and Policies (incorporating IP-One Action Area Plan) Development Plan Document (SAP DPD) relevant to non-transport related infrastructure and services and flooding.
- 1.5 This Hearing Statement has been prepared with due regard to the tests of 'soundness', as set out in Paragraph 182 of the National Planning Policy Framework (NPPF), namely:
  - **Positively prepared** the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
  - **Justified** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
  - **Effective** the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
  - **Consistent with national policy** the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

#### 2.0 RESPONSE TO MATTER 10 – NON-TRANSPORT RELATED INFRASTRUCTURE AND SERVICES AND FLOODING

- 2.1 **Policy CS16: Green Infrastructure, Sport and Recreation** This Policy requires all developments to contribute to the provision of open spaces according to the Borough's standards. The open space requirements are set out within Policy DM29 and Appendix 6 of the CSP DPD, and we will therefore provide our comments on the specific requirements under this Policy below.
- 2.2 **Policy CS17: Delivering Infrastructure** This Policy requires new developments to meet on and off-site infrastructure requirements needed to support the development and mitigate the impact of the development on the existing community and environment. The flexibility provided within this Policy, which allows for developments to provide new infrastructure, or contribute to the improvement or extension of existing off-site infrastructure (where necessary) through Section 106 Agreement or CIL charge, or other mechanism as agreed with the Council, is supported.
- 2.3 Key strategic infrastructure requirements needed to deliver the objectives of the Core Strategy include measures to increase east-west capacity in the transport system. It is considered that the wording should be amended to indicate that opportunities to increase east-west capacity should be maximised.
- 2.4 A set out in this Policy, specific infrastructure requirements linked to IGS are identified in the IGS SPD. IGS is to be considered as part of Matter 5 and therefore specific comments relating to infrastructure for IGS will be set out within our Hearing Statements for this Matter, the deadline for which is 24 June 2016.
- 2.5 Policy DM29: Provision of New Open Spaces, Sport and Recreation Facilities This Policy requires developments to mitigate their own impact through the provision of the various open space and facility typologies identified in Appendix 6. The emerging Draft Open Space SPD (January 2016) reflects these standards. Reference should be made within this Policy to the potential for flexibility to be applied to the typologies, in situations where the on-site green space provision meets the overall requirements. Flexibility should be provided where it is deemed necessary, as a result of site specific circumstances. This Policy as currently worded is not "effective" and is therefore considered 'unsound' in this regard.