

Matter 4b – Residential Development Allocations

1. Introduction

1. This Statement is submitted on behalf of The Kesgrave Covenant Ltd, which controls land within and adjoining the Borough boundary at north-east Ipswich. The Kesgrave Covenant Ltd are broadly supportive of the strategy set out by the Council in the draft Core Strategy and Site Allocations Plan, but consider that land at North-East Ipswich should properly have been included as a broad location for development in the Core Strategy (or a site specific residential allocation under Table 1/Policy SP2 in the Site Allocations Plan).

2. Response to Inspector's Questions

Are the site allocations for residential development soundly-based? Are there other non-allocated sites which could appropriately contribute towards housing needs during the plan period?

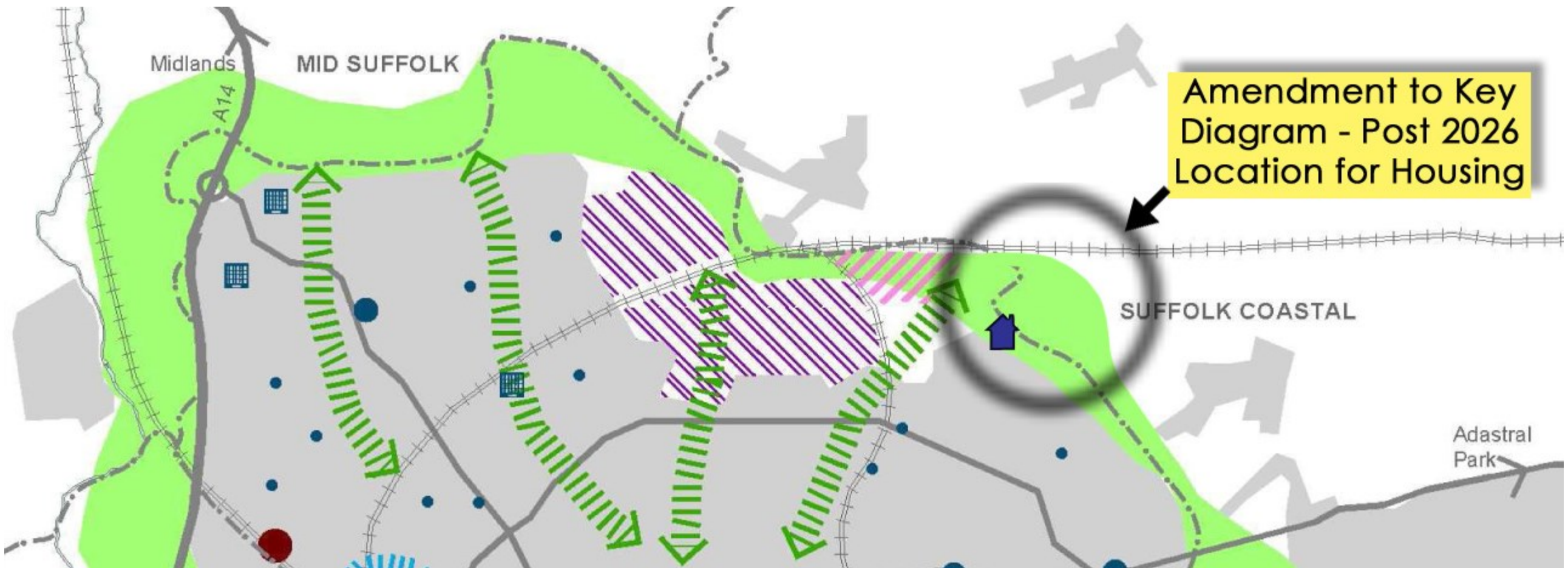
2. We have no comments to make on the first part of the question. Our concerns relate only to the second part, and specifically to our client's land at North-East Ipswich.
3. The land owned by our client at North-East Ipswich lies partly within Ipswich Borough Council's administrative area, and partly within Suffolk Coastal District Council's area. In our representations (and in the discussion on Matter 1) we have highlighted the potential for a strategic development in this location that straddles the Borough boundary. However, our representations to the Site Allocations Plan related only to the 14.6 ha of land that our client controls within the Ipswich Borough Boundary, and not to any adjoining land in Suffolk Coastal District, and our submission that the land within the Ipswich boundary is suitable for allocation is not dependent upon any additional land falling outside the Borough boundary.
4. Our original representations to both the Core Strategy and Site Allocations Plan suggested two possible alternative approaches to the treatment of development potential at North-East Ipswich, as follows:
 - (a) Our representations to the Core Strategy suggested that the Key Diagram be amended to show North-East Ipswich as a post-2026 location for residential development (with consequential amendments to Policy CS2 and Table 2). Appendix 1 to this Statement shows the suggested Key Diagram modification put forward in our original representations.
 - (b) Our representations to the Site Allocations Plan suggested that instead of a broad location for future development, our client's land could be specifically allocated for residential development (with consequential amendments to Table 1 of the Site Allocations Plan). Appendix 2 to this Statement shows the proposed area for allocation.

5. Although the Policies listed alongside the Matter 4b question are Policies SP2, SP3 and SP4 of the Site Allocations Plan, we remain of the view that either of the above approaches would be appropriate in the current circumstances (the circumstances being that of a submitted Plan that is unable to provide sufficient housing land to meet identified needs, but where suitable land exists within the Borough boundary that can contribute to meeting that need).
6. If however there is any concern that insufficient evidence exists at the current time to justify a site specific allocation under Policy SP2/Table 1, we would commend option (a) above, as a means by which a broad location can be identified now, but with actual allocation of the land and the definition of a specific site boundary to be a matter for future review. The addition of simple Modifications to the Key Diagram, Policy CS2 and Table 3 of the Core Strategy would cover the identification of a broad location for growth, with allocation dependent upon a review of the Plan (indeed, this is basically the mechanism used in the 2011 Adopted Core Strategy for the Northern Fringe, where only part of the Northern Fringe was allocated for development at that time, and the remainder identified as a 'broad location' for future development, to be brought forward through the next iteration of the Core Strategy, in accordance with Policy CS10 and paragraph 8.111 of the adopted Core Strategy). Our specific suggested amendments are set out at the end of this Statement.
7. The site is recognised in the Council's SHLAA (Core Document ICD09) as being suitable and available. All potential sites within the Northern Fringe area were caveated in the SHLAA as having "infrastructure constraints" (including those sites now forming the allocated Northern Fringe), but no specific infrastructure constraints have been identified in respect of this site. A short note from our client's Highways/Drainage Engineer is attached at Appendix 3, which confirms no known constraints.
8. The reasons why we agree with the Council's SHLAA assessment that the site/location is suitable for residential development are set out in our original representations to the Core Strategy and Site Allocations Plan, and are not repeated here.
9. It will be noted that in our original representations, we suggested that the site/location was appropriate for delivery post 2026. This suggestion was made on the premise that the Submission documents identified sufficient land for housing up to the latter part of the Plan period, and that new sites would only be needed for the final 5 years of the Plan period, rather than there being any impediment to earlier delivery. Our clients remain flexible on timeframes for delivery.
10. Finally, and for the sake completeness, our client also made representations relating to the proposed 'Green Rim' policy, which it is argued should not be finalised until the potential for development at North-East Ipswich has been properly assessed. We consider that development in this location can contribute positively to the objectives of the Green Rim in terms of enabling positive access to the countryside for recreation, but that the extent/role of the Green Rim and any appropriate development need to be considered concurrently.

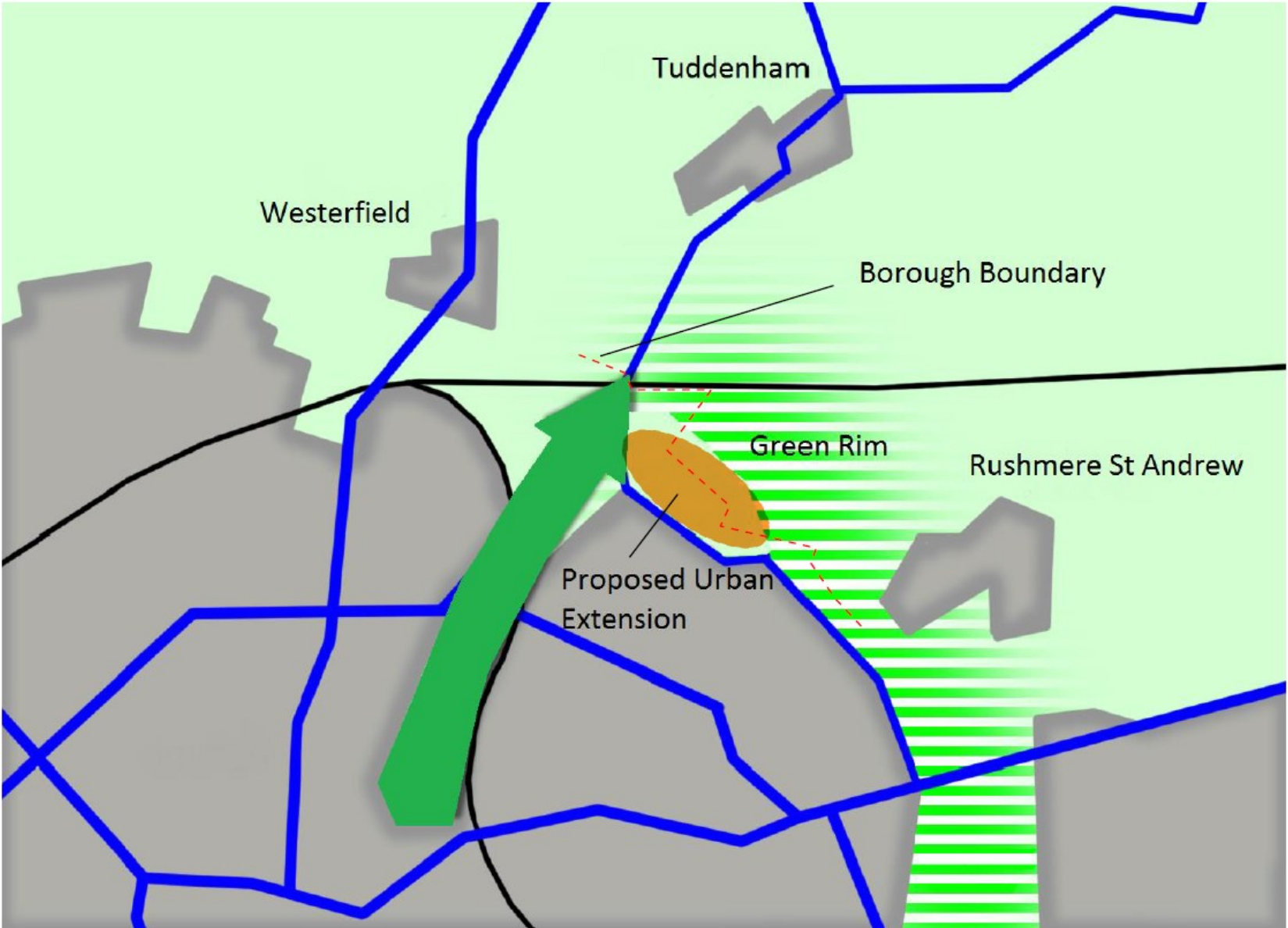
3. Specific Amendments

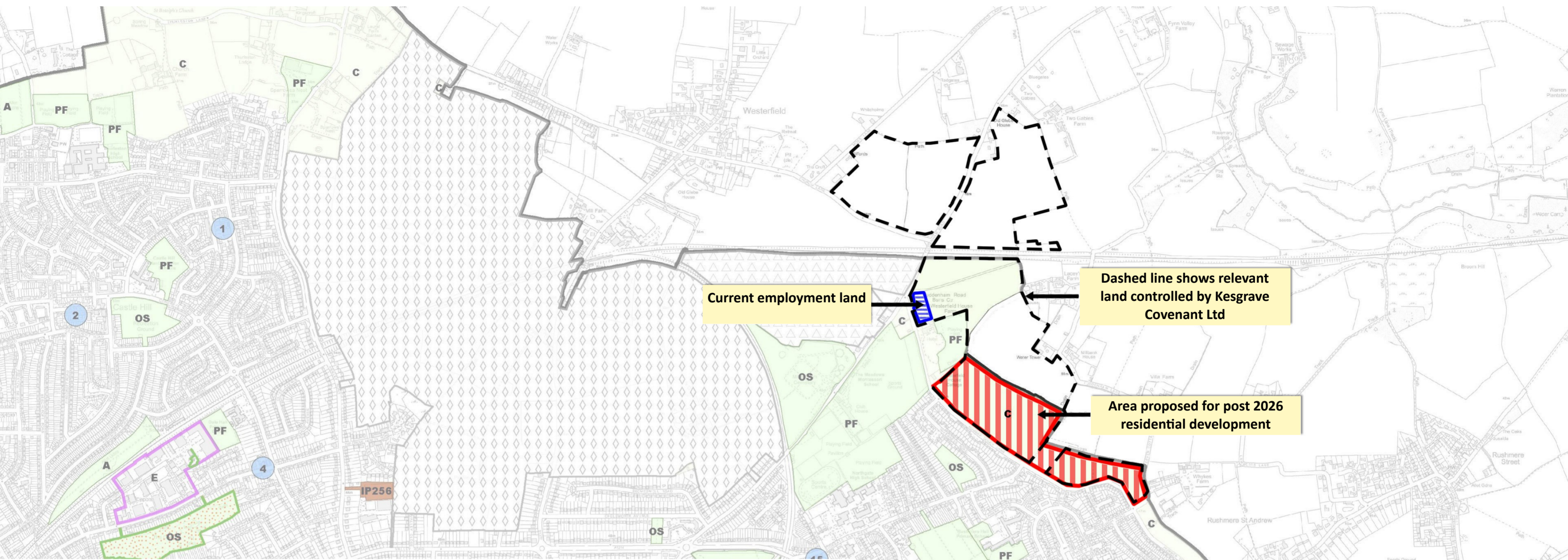
11. In the context of a site allocation, the specific changes required would be depiction on the Proposals Map and the addition of the site to Policy SP2 and Table 1.
12. In the context of identification as a broad location, the changes proposed are broadly as set out in our original submissions to the Key Diagram, Policy CS2 and Table 3, as follows:
 - Key Diagram – Inclusion of symbol for broad location;
 - Policy CS2 – Part (a) amended to state:

“Focussing new residential development and community facilities into the town centre, the Waterfront, Ipswich Village, and Ipswich Garden Suburb, ~~and~~ into or within walking distance of the town’s district centres, and at the future housing growth location(s) shown on the Key Diagram (the latter subject to allocation through the Site Allocation Plan or a future review of that document), and supporting community development;”
 - Table 3 – Add a row in Table 3 between the rows for “Windfall” and “Residual” to refer to “Residential Broad Location(s) – subject to allocation through the Site Allocation Plan or a future review of that document”, with a figure of 300 units (which can in turn be deducted from the “Residual” figure in the new row).



North East Ipswich Urban Extension - Schematic Diagram



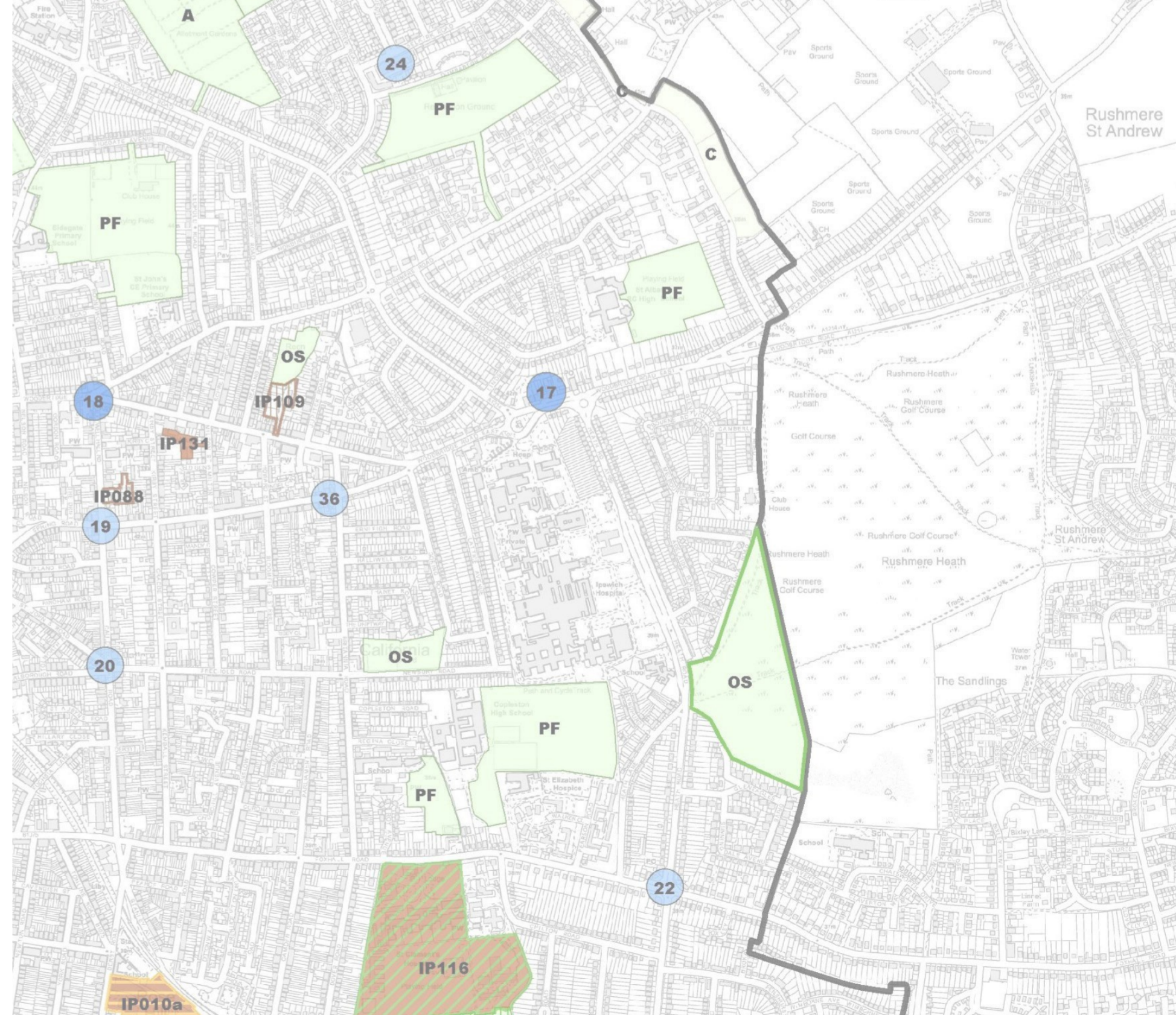
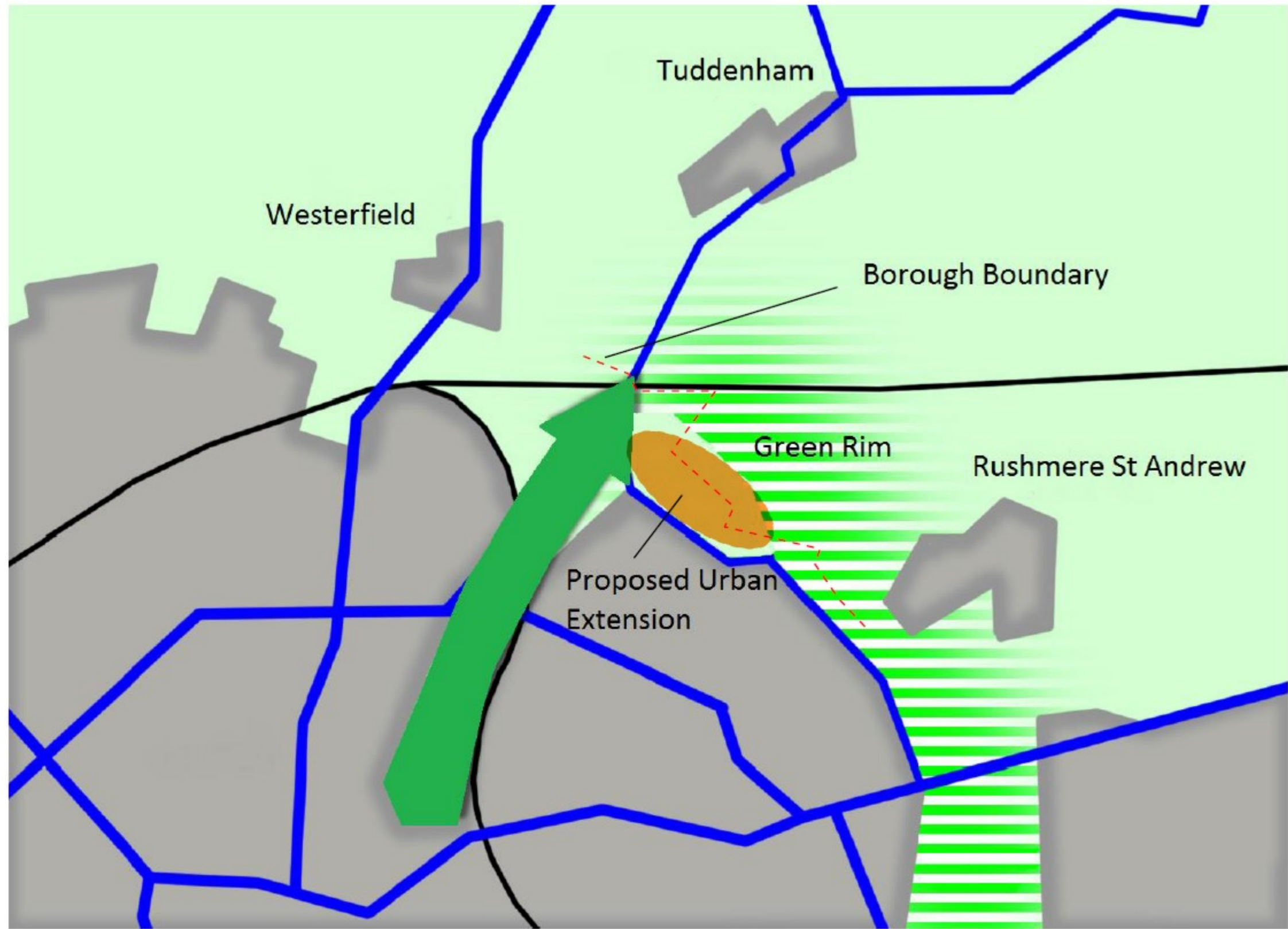


Current employment land

Dashed line shows relevant land controlled by Kesgrave Covenant Ltd

Area proposed for post 2026 residential development

North East Ipswich Urban Extension - Schematic Diagram



THE KESGRAVE COVENANT LTD

LAND NORTH OF HUMBER DOUCY LANE AND EAST OF TUDDENHAM ROAD, IPSWICH

IPSWICH BOROUGH COUNCIL SHLAA

REPRESENTATIONS TO THE SITE ALLOCATIONS PLAN

TRANSPORT AND DRAINAGE

Trevor Sparkes Consulting Limited
Chartered Civil Engineer
Chartered Highways and Transportation Engineer

THE KESGRAVE COVENANT LTD

LAND NORTH OF HUMBER DOUCY LANE AND EAST OF TUDDENHAM ROAD

REPRESENTATIONS TO THE SITE ALLOCATIONS PLAN

TRANSPORT AND DRAINAGE

Site Location

The site is located at the north-east edge of the Borough of Ipswich, north of Humber Doucy Lane and east of Tuddenham Road. The site is 3 km (1.86 miles) from the town centre, the largest employment area in Ipswich, and 2 km (1.2 miles) from Ipswich Hospital. The site includes an existing employment area and other employment areas are within approximately 5 km (3 miles) of the site.

Highway Access

The site is within approximately 1.5 km (0.9 miles) of the A1214 which is part of the principal road network. The site area is served by four existing radial routes, which give direct access to the A1214.

Westerfield Road gives access to the A1214 Valley Road and is accessible via Church lane, which could be improved using land controlled by The Kesgrave Covenant Ltd.

Tuddenham Road is adjacent to the site and provides access to the A1214 Colchester Road.

Rushmere Road is close to the site and gives access to the A1214 Colchester Road via Humber Doucy Lane.

Playford Road provides access to the A1214 Woodbridge Road East, also via Humber Doucy Lane.

There is also access to the A1214 Colchester Road via Sidegate Lane.

Therefore there is good accessibility to a number of distributor routes and there are no access issues.

Trevor Sparkes Consulting Limited
Chartered Civil Engineer
Chartered Highways and Transportation Engineer

Public Transport

Humber Doucy Lane, which runs along the southern boundary of the site, is very well served by existing bus services.

Ipswich Buses routes 5 and 11 run at 20 minute intervals in each direction on a gyratory route to and from the town centre Tower Ramparts bus station via Ipswich Hospital. The journey time to the town centre is 18 minutes and from the town centre it is 12 minutes. The journey time to the hospital is 8 minutes and from the hospital it is 5 minutes.

Beestons operate service 30 and 30A between Ipswich and Woodbridge which passes along Tuddenham Road. Also service 39 between Ipswich and Rushmere, which runs along Humber Doucy Lane, and Service 72 between Ipswich and Woodbridge via Rushmere Road.

The rail services at Westerfield Junction are easily accessible from the site via Church lane and Westerfield Road. Facilities at Westerfield Junction are due to be enhanced as part of the package of infrastructure improvements included in the Ipswich Northern Fringe development and this will also increase the attractiveness of rail travel for residents in the Humber Doucy Lane area, which is about 2 km (1.25 miles) from the station.

Walking and Cycling

The site benefits from being adjacent to the existing residential area on the south side of Humber Doucy Lane from where there are long established existing walking and cycling routes to local services, the town centre, Ipswich Hospital and to other parts of the town in the normal manner in relatively large urban areas such as Ipswich.

Schools

Similarly, existing schools are within easy walking distance of the site.

Drainage

There are existing public sewers close to the site into which foul drainage from the development could be discharged via a new on-site foul pumping station and a new off-site foul rising main.

Discussions with the Environment Agency have confirmed that surface water drainage from a sustainable urban drainage system within the development incorporating flow attenuation in a storage pond may be discharged to the River Fynn via a new off-site surface water sewer.

Trevor Sparkes Consulting Limited
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Chartered Highways and Transportation Engineer

Flood Risk

The site is located in Flood Zone 1 and there is negligible risk of flooding.

Sustainability

The site is relatively close to the town centre (3 km) and is contiguous with existing residential development that is very well served by existing bus services. Also it is very close to the principal road network. There are existing walking and cycling routes to local services, the town centre and the wider areas of the town via the urban network of footways and roads. Schools are within walking distance as are local shops. Therefore the site is well located for sustainable travel by means other than the private car and the development would be the subject of a substantial travel plan with robust targets to encourage further sustainable travel to and from the development.

Deliverability/Site Ownership

The site is owned by one landowner with experience of large scale developments in the Ipswich area having been the developer of Grange Farm, Kesgrave and therefore the development is deliverable without any delay due to multiple land ownership or any other related problems.