
WRITTEN STATEMENT

IPSWICH BOROUGH COUNCIL CORE STRATEGY AND POLICIES DPD REVIEW

EXAMINATION HEARING SESSIONS JUNE 2016

MATTER 8 – HERITAGE, DESIGN AND THE NATURAL ENVIRONMENT

PREPARED ON BEHALF OF
CREST NICHOLSON

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 8 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 8 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 heritage, design and the natural environment.
- 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** – plans 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** – plans should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – plans should be deliverable over their period and be based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** – plans should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.0 RESPONSE TO MATTER 8 – HERITAGE, DESIGN AND THE NATURAL ENVIRONMENT

Para 8.1 Are the policies in connection with heritage, design and the natural environment soundly-based? If you contend that they are not how should they be modified?

- 2.1 **Policy CS4: Protecting our Assets** – Reference to the Code for Sustainable Homes should be removed from Paragraph 8.58 of the supporting text, to reflect the withdrawal of the Code by Government.
- 2.2 **Policy DM5: Design and Character** – Part e. of this Policy requires all new developments to protect and enhance the setting of any nearby listed buildings. However, this is not considered to be “consistent” with National policy. Notably, the NPPF Para 134 allows for “less than substantial harm” to a designated heritage asset, should it be demonstrated that the harm is outweighed by the public benefits provided by the scheme. New developments cannot therefore be expected to protect and enhance the setting of a listed building in all situations. We therefore suggest the following amendments to Policy DM5:
- e. Where possible, protecting and enhancing the special character and distinctiveness of Ipswich, including significant views that are recognised as being important and worth protecting, the setting of any nearby listed buildings, and helping to reinforce the attractive physical characteristics of local neighbourhoods and the visual appearance of the immediate street scene – albeit any potential harm needs to be weighed against any public benefits provided by the scheme (NPPF Para 134).**
- 2.3 Part i. of this policy introduces the provision of public art where this would be required to enhance the public realm and/or reinforce a sense of place. This Policy states that this could include new installations where this would be commensurate to the scale and type of development. This Policy should be amended to indicate that requests for public art will be proportionate in scale and allow for flexibility, for example taking into account other contributions sought on an individual development. This is considered necessary to ensure that new developments remain viable and deliverable and for the Policy to be “justified” and “effective”. Furthermore, the definition of ‘art’ should be flexible and cover the delivery of a wide range of products/installations.
- 2.4 This Policy also requires that 35% of new dwellings, on developments of 10 or more units are built to Building Regulations standard M4(2) and where affordable housing is provided a proportion of dwellings should be provided to be built to Building Regulations standard M4(3).

The viability implications of introducing these optional standards has not been properly assessed by IBC. Therefore without robust evidence, this requirement is not “justified” and Policy DM5 is “unsound”.

2.5 We do however welcome the flexibility provided within the Policy, which states that the Council will consider waiving or reducing the requirement where the circumstances of the proposal, site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable. This flexibility will ensure that the requirements do not hinder development in specific circumstances.

2.6 **Policy DM10: Protection of Trees and Hedgerows** – Part h. of this Policy requires replacement planting where the removal of trees or hedgerows is proposed, on a two for one basis. No justification for this requirement has been provided and therefore Policy DM10 is “unsound”. A one for one replacement is considered to be more appropriate as this would provide for adequate mitigation.