

## Ipswich Core Strategy Examination

### Hearing Statement

#### Matter 8: Heritage, design and natural environment

1 June 2016

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## **MATTER 8 – Heritage, design and natural environment**

### **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 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?*

- 2.01 It is our view that policies CS4, DM5, DM5 and DM31 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 CS4***

- 2.03 The final paragraph of policy CS4 does not relate to the main theme of policy CS4 which is the protection of natural and heritage assets, rather than the protection of resources. It is therefore not effective. The final paragraph should be deleted.

#### ***Policy DM5***

- 2.04 Policy DM5 seeks to establish requirements for Building for Life without being explicit about those intentions. It also seeks to impose the optional requirements of Building Regulations standard M4(2). The latter is justified by the Council (LPCD15) on the basis that the additional building costs of provision are offset by reductions in other building cost. That is no justification for imposing standards given the clear message set out in paragraph 173 of the NPPF and in Practice Guidance (Paragraph: 007 Reference ID: 56-007-20150327) which specifically requires strong justification. Instead, the additional cost of measures and their effect on viability must be fully considered given that the government's decision to withdraw the Code for Sustainable Homes is a separate policy area to that of optional national space standards.

- 2.05 LPCD15 fails to specifically deal with the issue of the “*size, location, type and quality of dwellings needed to meet specifically evidenced needs*” (Practice Guidance paragraph 007) and specifically highlights (paragraph 7.5) that the greatest impact on design form will be in relation to ‘suburban’ densities – exactly as proposed at the IGS.
- 2.06 There is also strong evidence to indicate that there is considerable risk to the practical deliverability of dwellings where planning policy is out of step with building standards. The Local Authority Building Control group specifically warns of these dangers<sup>1</sup>. The practical implication of the application of the optional standards might include, for example, the need a first floor flat (such as a maisonette arrangement) to be provided with a lift whether or not the occupier requires it.
- 2.07 Our view is that the Council have not justified the imposition of the optional standards and that the policy will not be practically effective. The last paragraph of Policy DM5 should be struck out.

***Policy DM31***

- 2.08 The Council seeks to establish a ‘two-for-one’ replacement policy under clause (h) of the policy. No justification for that approach has been set out and we recommend that the requirement be struck out to be replaced with wording which requires specific appropriate mitigation.

***Policy DM33***

- 2.09 We support the amendments made to policy DM33 in respect of development within green corridors.

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<sup>1</sup> The LABC is a not-for-profit membership organisation that represents all local authority building control teams in England and Wales. See <http://www.labc.co.uk/guidance/resource-library/housing-standards-review-and-optional-requirements-what-planners-need-know>