

26th May 2016

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Dear Annette,

Re: Ipswich Local Plan Examination (Stage 2) – Matters and Questions

The following further written statement has been prepared by Boyer on behalf of the East of England Co-operative Society in respect of Stage 2 of the Ipswich Local Plan Examination. Specifically it addresses a number of the Matters and Questions posed in relation to the Ipswich Borough Council Submission Core Strategy and Policies Development Plan Document and the Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD, upon which our client has duly made representations.

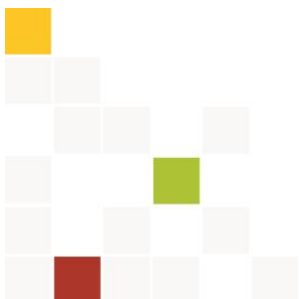
As you will be aware the Society has a number of property interests in the Borough ranging from trading Co-operative convenience stores and Funeral Directors premises to potential development opportunities presented by the re-organisation of a variety of sites within its portfolio. A number of these sites are currently under discussion with officers at Ipswich Borough Council in respect of how they may be brought forward in an appropriate manner to assist delivery of the Local Plan, and indeed these have been the subject of previous representations at earlier stages of the review process, as noted above.

As set out in previous correspondence with the Programme Officer, it was considered unnecessary to participate in the hearing sessions. However we would like to take the opportunity to provide brief responses to the questions relating to several of the policies of relevance to the Society's interests.

Representations are therefore set out below in relation to Matter 4b – Residential Development Allocations, Matter 7 – Town Centre / Retail policies and Allocations and Matter 8 – Heritage, Design and the Natural Environment.

Matter 4b – Residential Development Allocations (SP2)

Question 4.2 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?



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The Society fully supports the identification of the Mint Quarter / Cox Lane area as a significant and important regeneration opportunity. Whilst the principle of mixed use development on the site is not objectionable in itself, it is considered that range of potential uses identified is unnecessarily restrictive. The assignment of mixed development comprising simply of residential, open space and car parking uses, is considered to be somewhat narrowly defined and may prevent a wider range of potential alternative uses equally well suited to a town centre location from being realised.

The site has previously been marketed for a range of alternative uses for a number of years without the successful delivery of an appropriate and viable development. In light of this it is therefore considered that the application of such a limited range of potential uses is likely to reduce the scope for delivery of the site within the Plan Period, particularly having regard to other constraints affecting parts of the site, as referred to below and at greater length within previous representations.

In this regard the inclusion of reference to the retention of the Carr Street frontage must be regarded as a substantial restriction on the potential redevelopment of the site. Representation has been made previously with regard to this matter. The inclusion of this requirement within the site allocations policy further reduces the flexibility which is required to successfully bring forward the redevelopment of the site.

It should be noted that the National Planning Policy Framework requires sufficient flexibility to respond to changing circumstances and stresses that policy burdens that would threaten viability should be avoided within the plan making process.

It is therefore recommended that the policy relating to this allocation is modified to allow greater flexibility for potential uses consistent with its town centre location, and to omit explicit reference to the retention of the façade to Carr Street, thereby removing unnecessary restrictions to redevelopment of the site in terms of both market interest and viability considerations.

Matter 7 – Town Centre / Retail Policies and Allocations (DM22, DM23, SP10)

Question 7.1 Are the policies (listed above) and site allocations in connection with retail and town centre development soundly-based? If you contend that they are not how should they be modified?

As stated in previous representations, the East of England Co-operative Society supports, and has been working hard to assist delivery of redevelopment of the Mint Quarter. In this regard, and as noted above, the Society recommends a more flexible approach is taken in order to maximise potential to secure delivery of the site in the short-term in a manner that will contribute significantly and positively to the vitality and viability of the town centre as a whole. On that basis, Policy DM22 is supported due to the flexible approach to potential uses at a site outside of the central shopping area.

Matter 8 – Heritage, Design and the Natural Environment (CS4, DM5, DM8, DM9)

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

As stated in previous representations, the East of England Co-operative Society has promoted and worked towards delivery of redevelopment of the Mint Quarter (IP048) in respect of its ownership interests within the site, and continues to be committed to bringing the site forward in a manner which will contribute towards regeneration of this key town centre site.

The direct reference within the site allocations policy to the requirement to retain the Carr Street façade is considered to represent an unnecessary burden that may harm viability and scope to successfully secure development of the site. This issue is further compounded by the amendments to Policies CS4 and DM8 that include reference to resisting the demolition or partial demolition of non-designated heritage assets.

The Society also previously objected to the Local Listing of the premises within the Local List SPD. Whilst it is acknowledged that this has since been confirmed, it is felt that the modifications to these policies seek to place excessive weight on the implications of non-designated heritage assets.

It is understood that the provisions of the Local List SPD would not rule out loss of this façade, but rather that emphasis would need to be placed upon a sufficiently high quality design solution for any redevelopment proposals. It is considered that this eventuality should either be outlined more explicitly within policies CS4 and DM8, or that the additions which relate the policy provisions inappropriately to undesignated assets should be deleted.

Policy CS4

The modification to Policy CS4 (Protecting our Assets) seeks to widen the scope of the protection that the policy offers to heritage assets by making specific reference to the maintenance of a list of buildings and other heritage assets of local importance, and taking steps to reduce the number of heritage assets at risk.

The Society maintains a concern that placing too much weight on the Local List SPD and undesignated heritage assets could unnecessarily constrain the future redevelopment and regeneration of important sites, not least buildings within its ownership that form part of the Mint Quarter regeneration area. The Local List SPD should be seen as supplementary guidance to assist development management decisions, and the concern is that by making explicit reference to 'heritage assets of local importance' within Policy CS4, places undue weight upon local listings. Policy CS4 should be in conformity with paragraph 135 of the National Planning Policy Framework which states that:

'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.'

Whilst the intentions of the Council to safeguard the historic environment are acknowledged in principle, the modifications could potentially place additional and unnecessary burdens upon development, particularly in relation to undesignated heritage assets. In particular the Society is concerned that the policy modifications could frustrate the redevelopment and regeneration of key sites, including the Mint Quarter (with reference to site IP048).

Policy DM8

Policy DM8 (Heritage Assets and Conservation) is similarly proposed to be modified in order to specifically include both Designated and Undesignated Assets, widening the scope of the policy. As with Policy CS4 above, whilst the intentions of the Council to safeguard the historic environment are acknowledged and supported in principle, this should not place additional unnecessary restrictions upon development, particularly in relation to key sites, such as the redevelopment of the Mint Quarter (with reference to site IP048).

Specifically the Society objects to the addition of a new third paragraph to Part a. of Policy DM8 which states that *'the Council will resist the demolition or partial demolition of both designated and undesignated heritage assets as outlined in paragraph 133 of the National Planning Policy Framework'*. This paragraph is considered to be in conflict with paragraph 133 of the NPPF which only makes reference to substantial harm or total loss of significance of a designated heritage asset (as opposed to a non-designated heritage asset as referenced within the policy modification).

In this regard Policy DM8 should in fact be in conformity with paragraph 135 of the NPPF which seeks a balanced approach to the determination of an application in relation to a non-designated heritage asset. Paragraph 135 states that:

'The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significant of the heritage asset.'

The Society considers that the additional third paragraph to Part a. of Policy DM8 should be amended to delete reference to undesignated heritage assets.

Yours sincerely



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