

Q16.

The SA (A4) contained an assessment of the spatial options that were previously identified in the Council's Issues and Options consultation document. That document, prepared jointly with East Suffolk Council, considered a range of strategies including higher density housing within the town and re-allocation of existing land uses to housing, as well as options beyond the town.

We consider that the Issues and Options document properly considered a range of appropriate alternatives strategic.

Ultimately, the SA correctly identifies that, given the scale of growth required, a combination of solutions are required. Under the 'higher density urban regeneration' option on Page 29 of Appendix C of A4 the SA notes under Objective 2 (meeting housing need) that whilst higher densities in the town "would make a major contribution towards meeting the housing need in the Borough by 2036 ... it would be unlikely to satisfy the need on its own and would have to be pursued in-combination with another option."

Equally, the SA's consideration of re-allocating other sites in the urban area (page 35 of Appendix C of A4) also notes that the option would need to be pursued in combination with other options.

We support the process that the Council has undertaken to consider the reasonable alternative strategies, and support Policy CS2 in its identification of the focus of development in the central area, but also its recognition that additional development is needed elsewhere (the IGS and Humber Doucy Lane as sustainable urban extensions) in order to deliver the overall quantum of growth required.

Q17.

As per our response to Q16, the Issues and Options document (prepared in conjunction with East Suffolk Council) did consider a range of options. These options were not restricted by the administrative boundary between the two authorities but looked at both at growth on a more strategic basis.

Also as per our response to Q16, it is evident that no single strategy for growth within the Ipswich administrative area would achieve the required housing delivery, and therefore the strategy has correctly, in our view, sought to deliver the reasonable maximum level of housing that can be delivered from within the central area of Ipswich (as evidenced from the SHELAA), the reasonable maximum that can be achieved across the remainder of the town (without developing on land that is important for other reasons such as open space – again based on the SHELLA), and then sought to provide the remaining required development via sustainable urban extensions.

The fact that IGS and HDL comprise roughly half the housing target is essentially a reflection of the limits of capacity elsewhere in the town.

The IGS proposals are a roll forward of the proposal adopted in the most recently revised Plan from 2017, which is now well advanced in the planning process with 1,915 units having already received Outline approval.

In relation to HDL, it is relevant to note that the Suffolk Coastal Local Plan was adopted on 23rd September 2020, and therefore the part of this allocation that falls within East Suffolk District is already allocated for development in a statutory plan. That Plan too was based on a Sustainability

Matter 2 Statement on behalf of Kesgrave Covenant Ltd.
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Appraisal (not part of this evidence base, but available as part of the evidence base to the SCDC LP 2020) that began with the same Issues and Option document and testing of the same spatial options through the SA process, and which also considered alternative sites. In the Suffolk Coastal Local Plan (Ref H2, Policy SCLP3.2 page 41), East of Ipswich is identified as a major centre in the settlement hierarchy, and a significant proportion of growth in that Plan is directed to this location. The cross-border allocation at HDL was found by the Inspector to be consistent with the growth strategy for that Plan.

In respect of the IBC Local Plan, the SA Addendum on this issue (128) explains in the 2nd paragraph on page 16 why the HDL allocation is a necessary and complementary element of the overall sustainable growth strategy set out in Policy CS2.