

**Ipswich Local Plan Examination
Hearing Statement
Matter 6: Site Allocations**

Humber Doucy Lane, Rushmere St Andrew

Prepared on behalf of Bloor Homes

November 2020

Matter 6: Site Allocations

Site Name:	Humber Doucy Lane, Rushmere St Andrew
Client Name:	Bloor Homes
Type of Report:	Hearing Statement
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1.0 Introduction

- 1.1 This Hearing Statement is submitted on behalf of Bloor Homes in relation to their site at Humber Doucy Lane, Rushmere St Andrew.
- 1.2 Bloor Homes have previously made representations to the Reg 18 and Reg 19 consultations of the emerging Ipswich Local Plan Review (ILPR) in March 2019 and March 2020 respectively.
- 1.3 In summary, those representations set out various concerns with the Plan that result in it being unsound. Modifications have been suggested to overcome these concerns and make the Plan sound.

2.0 Matter 6: Site Allocations

Question 91. Is the allocation of this site on green field land on the edge of the settlement justified? Did the SA consider reasonable alternatives to this allocation, such as more homes in the town centre or on other sites within the urban area?

- 2.1 The current allocation in this location follows the administrative boundary of Ipswich, which does not follow any distinctive features on the ground and as such is purely arbitrary.
- 2.2 Notwithstanding the administrative boundary, development in this location will create illogical boundaries that do not take advantage of the opportunity to provide additional growth in this area. Clearly the Council consider this is a suitable location for housing and should look beyond the administrative boundaries. The allocation within the East Suffolk adopted Local Plan will not remedy this issue with the boundaries.
- 2.3 Allocating additional land in this area, such as Bloor Homes' site at Humber Doucy Lane, would provide more logical boundaries that take advantage of the sustainable location and will provide additional homes to meet the identified affordable and market housing needs.

Question 108. Was the process for the selection of the site allocations robust? Was an appropriate range and selection of sites assessed and were reasonable alternatives considered? Were appropriate criteria taken into account in deciding which sites to select? Was the assessment against those criteria robust?

- 2.4 The Strategic Housing and Economic Land Availability Assessment (SHELAA) assessed the sites, finding Bloor Homes' site at Humber Doucy Lane not to be developable. However, this was based on a flawed approach due to the separate identity of Rushmere village needing to be retained and a question whether drainage, access and infrastructure constraints could be overcome (ID: 26590).
- 2.5 Indicative Masterplans and transport information have been consistently submitted as part of representations to the emerging Local Plan, demonstrating that the site can be drained by sustainable drainage methods, that suitable access can be provided and that the development would not have an adverse impact on the wider highway network. The drainage, access and infrastructure constraints mentioned in the SHELAA can be overcome and are not constraints to development.

2.6 The indicative masterplans have identified that suitable green infrastructure and open spaces can be included within the site to ensure the separate identity of Rushmere village remains. Despite this information being provided, the Council's initial assessment of the site has remained and it is not considered to be a robust approach.

2.7 Furthermore, the approach to assessing sites has been constrained to the administrative boundary of Ipswich. With the constraints presented by the boundary, assessing a wider range of sites including those outside the boundary, would have provided a more robust assessment, particularly given that one of the reasonable alternatives considered in the Sustainability Appraisal was increased development outside the boundary.

Question 109. Are the proposed housing allocations identified in Policy SP2 and Appendix 3 of the SAP, justified as the most appropriate sites when considered against the reasonable alternatives and would they be consistent with national policy, with particular regard to the following [as set out in Matters, Issues and Questions]

2.8 As set out above and in previous representations (ID: 26577), given the flawed approach to assessing sites only within the administrative boundary and not considering whether any constraints could be overcome, it cannot be robustly concluded that the ILPR allocates the most appropriate sites when considered against reasonable alternative.

2.9 Furthermore, the housing allocation strategy proposed by the ILPR cannot be considered appropriate. Whilst the Council's intention to make effective use of brownfield land is to be commended and is consistent with the NPPF, this should not be at the expense of providing housing that people need.

2.10 The allocated sites will deliver predominantly one and two bedroom flats and will not deliver sufficient affordable housing. The proposed housing allocations alone cannot therefore be justified as the most appropriate sites for meeting the identified housing need of three or more bedroom homes.

2.11 Allocating additional sites that can provide affordable and market housing, across a range of bedrooms including larger family homes, would rectify this issue of soundness in seeking to ensure that the identified needs are met, consistent with national policy.

- 2.12 Bloor Homes' site at Humber Doucy Lane is one site that could deliver 200 homes within the short/medium term, including affordable housing and larger family homes. In the longer term, there is the opportunity for a large scale development on land adjacent to the administrative boundary. Such a development would increase the amount of housing provided to meet identified affordable and market housing needs, consistent with national policy.