



Ipswich Borough Council Local Plan Review 2018-2036 Examination

Hearing Statement Matter 6



Boyer

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1. INTRODUCTION

- 1.1 This hearing statement has been prepared by Boyer and is submitted on behalf of Ipswich School following the representations made to the Ipswich Local Plan in March 2020.
- 1.2 Ipswich School is actively seeking to engage in the preparation of the Ipswich Local Plan which will guide the development of the Borough up to 2036. Ipswich School is seeking to promote and use their land holdings in a more effective manner to secure the long-term future of the school which is a registered charity.
- 1.3 In its 600 year history, Ipswich School has been supported by local benefactors including Richard Felaw who in 1482 gave his house for the education of boys in the town, but unlike many other private schools Ipswich School does not have a major endowment and it therefore has to manage its assets carefully in order to be able to deliver its charitable objectives. As a charity, Ipswich School has a long-term strategy to open up access to the School to any worthy pupil, regardless of their ability to pay. The School see this as a major contribution to education in Suffolk, which helps address social mobility and allows pathways to be opened up to deserving pupils.
- 1.4 Ipswich School has submitted representations to previous stages of Local Plan preparation and is a key partner within the Ipswich Garden Suburb (IGS), through land ownership. Representations relate to the need to secure greater flexibility for the school and its land holdings to ensure that the needs of the school can be met in the long term.
- 1.5 Land at Tuddenham Road is currently allocated for Sport and Open Space provision which is not in the best interests of Ipswich School, due primarily to the cost implications or relocating facilities from the existing site at Notcutts Field (which is within the area designated for IGS).
- 1.6 Reallocating land at Tuddenham Road for residential use will ensure that opportunities for housing development are increased across Ipswich Borough but also provides greater assurance for Ipswich School through a positive and appropriate allocation.
- 1.7 Parcels of land are currently allocated but these do not provide the most appropriate solution for the school and are not considered to be justified and effective allocations as they do not match the aspirations of the land owner as explained in more detail below and other hearing statements submitted on behalf of Ipswich School.
- 1.8 It remains the view of Ipswich School that the emerging Ipswich Local Plan is not justified and the allocations within it are undeliverable.
- 1.9 This hearing statement relates to Matter 6: Site Allocations.

2. MATTER 6: SITE ALLOCATIONS

- 2.1 On behalf of Ipswich School, a number of questions from the Inspector Matters, Issues and Questions have been addressed below. For ease of reference the question has been provided in bold and italics font with the response below.
- 2.2 This hearing statement focuses on Matter 6: Site Allocations but should also be read alongside hearing statements submitted for Matter 2: Spatial Strategy and Matter 3: Housing Provision.
- 2.3 Within this hearing statement, Ipswich School has looked at the questions relating to the Strategic Allocations and specifically the Ipswich Garden Suburb and land at Humber Doucy Lane.
- 2.4 Responses to questions which are considered relevant to the interests of Ipswich School and land holdings at Notcutts Field and Tuddenham Road have been provided in the paragraphs below.
- 2.5 As an update to the information submitted within representations in March 2020, further details relating to existing Local Plan site allocations has also been provided. This information has been updated to reflect understanding as at the beginning of November 2020 and clearly demonstrates that many of the allocations cannot be relied upon to deliver dwellings as anticipated by the Council.

Ipswich Garden Suburb (IGS) (Policy CS10)

84. What evidence is there to support the Council's assumptions in respect of the anticipated delivery rate for the IGS? Is this realistic?

- 2.6 The Council's assumptions in respect of delivery on the Ipswich Garden Suburb is not realistic as this fails to take into account the financial implications and the appropriate method for relocating the playing fields use found at Notcutts Field.
- 2.7 Ipswich School has identified that the relocation of the playing fields is unviable and therefore unlikely to happen based on the current allocations seen in the emerging Local Plan and therefore the assumptions outlined by the Council are considered to be unrealistic and bring the deliverability of the Notcutts Field site into question over the plan period.

85. Is the phasing of the IGS justified and effective?

- 2.8 Ipswich School consider that the phasing of the Ipswich Garden Suburb is not justified and not effective because in order for the strategic allocation to be delivered comprehensively the provision of replacement sport facilities is required as detailed in paragraph 8.135 of the Final Draft Local Plan.

- 2.9 The representations submitted by Ipswich School outline that the provision of replacement sports facilities is unviable and is unlikely to be an option that will be taken up, therefore the allocations are not justified and bring the deliverability of the Local Plan into question.
- 2.10 It is accepted that for development to take place on Notcutts Field and for that parcel of land to be incorporated into the Ipswich Garden Suburb, the existing playing fields and sports facilities will need to be relocated.
- 2.11 The sale of Notcutts Field on its own is highly unlikely to raise the funds required to relocate the sports facilities on a new site to a modern standard. Therefore with Notcutts Field unlikely to be released due to viability issues over the plan period, the Ipswich Garden Suburb will fall short of delivering the overall quantum of development expected. Allocation of land at Tuddenham Road for residential use will potentially enable release of Land at Notcutts Field.
- 2.12 As detailed within the representations, in recent years, Ipswich School has invested heavily in sports facilities in the local area, namely at the site in Rushmere. As a result, the original intentions behind relocating to land at Tuddenham Road are being reviewed and are considered no longer to be fit for the purpose of the school.

Humber Doucy Lane (Policy ISPA4.1)

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?

- 2.13 The emerging Local Plan identifies land at Tuddenham Road for Sports Use which is considered to be unjustified.
- 2.14 The site in the ownership of Ipswich School is considered to be an appropriate site for development and in a location which accords with the strategy that the Council is promoting through this Local Plan.
- 2.15 By continuing with the allocation for Sports Use on land at Tuddenham Road, the Council have incorrectly discounted a reasonable alternative in light of a focus on regeneration sites which as detailed in Appendix One are not certain of development coming forward in the plan period.
- 2.16 Should the land at Tuddenham Road be allocated for residential uses, the opportunity presented will complement the allocations at Humber Doucy Lane and the Ipswich Garden Suburb not only in being able to deliver the same strategic objectives but also enable greater links between these allocations in the form of walking and cycling links. The land also provides the opportunity for the Council to significantly boost the supply of housing across the Borough and ensure that a housing land supply is maintained over the plan period.

2.17 Through the allocation of land at Tuddenham Road for residential uses, the Council will be able to deliver a sound Local Plan which secures development opportunities and necessary infrastructure for the local community over the plan period, but also enables Ipswich School to meet its requirements as a charity and deliver its charitable objectives including opening up access to the School to any worthy pupil, regardless of their ability to pay. The School see this as a major contribution to education in Suffolk, which helps address social mobility and allows pathways to be opened up to deserving pupils. One way of achieving these charitable objectives is through making best use of its assets in a carefully managed way.

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?

2.18 A considerable number of the site allocations are historic allocations that were first included in the 1997 Local Plan 23 years ago. There is very little evidence of much progress being made on these sites with limited activity from site promotor. It is apparent that many of the sites have simply been included within the emerging Local Plan on the basis that they are long standing allocations without the specific circumstances of each site being properly re-assessed. A schedule of these sites is included at Appendix One and summarised below

- IP009 Victoria Nurseries, Westerfield Road (12 dwellings)
- IP011c Smart Street, Foundation Street (North) (7 dwellings)
- IP012 Peter's Ice Cream (35 dwellings)
- IP035 Key Street / Star Lane / Burtons (St Peter's Port) (86 dwellings)
- IP0376 Island Site (421 dwellings)
- IP054b Land between Old Cattle Market and Star Lane (23 dwellings)
- IP132 Former St Peters Warehouse Site, 4 Bridge Street (73 dwellings)
- IP136 Silo, College Site (48 dwellings)
- IP150d Land south of Ravenswood Sports Park (34 dwellings)
- IP150e Land south of Ravenswood (126 dwellings)

2.19 In total 2,750 dwellings are allocated as Site Allocations through Policy SP2. Collectively, the sites listed above and summarised in Appendix One total 865 dwellings. This represents a significant proportion (approximately one third) of the total number of dwellings allocated through Policy SP2. It is not considered a robust approach to simply transfer a site allocation from one Plan to the next. There should be collaborative working and ongoing dialogue between landowners/their agents, IBC and other relevant bodies in allocating sites but it does not appear that this has been the case with these sites. Just because a site has historically been suitable for development does not mean it is the right approach today.

2.20 The approach is therefore not considered to be robust, particularly when there are other more deliverable sites, such as land west of Tuddenham Road, where the landowner is proactively seeking for the site to be brought forward for residential development.

111. Are the housing allocations listed in Table 1 and referred to in Policy SP2 justified and effective? What evidence is there to demonstrate that they are deliverable and/or developable in accordance with the housing trajectory and the proposed site capacity? In particular, are they:

- confirmed by the landowner involved as being available for the use proposed?

- supported by evidence to demonstrate that safe and appropriate access for vehicles and pedestrians can be provided?

- deliverable, having regard to the provision of the necessary infrastructure and services, and any environmental or other constraints?

2.21 The deliverability of the housing allocations listed at paragraph 2.18 above is questioned. Our justification for questioning each of the sites is set out in Appendix One.

2.22 Each of these sites were included within the 1997 Local Plan and as such have been allocated for 23 years with very little progress being made to demonstrate their deliverability. It is unclear how this approach to site allocations can be justified and it is not effective. There should be confidence that the sites being allocated within the Plan will be delivered over the Plan Period and that cannot be said for these historic allocations.

IP009 – Victoria Nurseries, Westerfield Road

118. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

2.23 Yes, it is considered more cautious approach should be undertaken. The site is a long-standing allocation. However, it is noted that there has been a recent local press release for the development of a 76-bed care home at the site. Therefore the site could potentially become undeliverable if the development goes ahead. (Further details are included at Appendix One).

IP011c – Smart Street / Foundation Street (North)

123. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

2.24 Yes. This site currently operates as a car park and there appears to be no evidence of redevelopment proposals at this stage. Further details are included at **Appendix One**.

IP012 – Peter's Ice Cream, Grimwade Street

124. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

- 2.25 Yes. Based on the planning history available on the Council's website, there appears to be no evidence of this site being brought forward. Further details are included at **Appendix One**.

IP035 Key Street/Star Lane/Burtons (St Peter's Port)

128. Would the development of this site be viable with the capacity proposed?

- 2.26 The site promoter suggested in representations that the site would not be viable at the current density due to the site constraints. It would not be appropriate to increase the height of buildings as requested by the site promoter due to the detrimental impact on heritage assets. It is also apparent that the site has been allocated since the 1997 Local Plan and not been brought forward to date further suggesting there may be viability issues with the site. Further details are included at **Appendix One**.

129. Should the Site Sheet refer to the need for car parking to be incorporated into this development to support it and developments on IP206 and IP211?

- 2.27 Yes. This may affect the developable area of the site and therefore the overall viability and deliverability.

IP037 – Island Site

133. Would a more cautious approach to the delivery of this site be necessary given the requirement for an additional access and that it has been allocated since 1997?

- 2.28 Yes. Associated British Ports is seeking to reduce the allocation from 421 to 150 units (a reduction of 271 units). This is to reduce the density of the site and potentially the requirement for a second access. On this basis, the allocation should be amended to 150 units towards. Some work has been undertaken to create a vision for the site but it is considered that if the site does come forward it would be in the long term towards the end of the Plan period or beyond. Further details are included at **Appendix One**.

IP054b – Land between Old Cattle Market and Star Lane

140. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

- 2.29 Yes. There appears to be no evidence of this site being brought forward. Further details are included at **Appendix One**.

IP132 – Former St Peter's Warehouse, 4 Bridge Street

144. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

2.30 Yes. There appears to be no evidence of this site being brought forward. Further details are included at **Appendix One**.

IP136 – Silo, College Street

145. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

2.31 Yes. There appears to be no evidence of this site being brought forward. Further details are included at **Appendix One**.

IP150d – Land South of Ravenswood – Sports Park

150. Would a more cautious approach to the delivery of this site be necessary?

2.32 Yes. There appears to be no evidence of this site being brought forward. Further details are included at **Appendix One**.

IP150e – Land South of Ravenswood

154. Would a more cautious approach to the delivery of this site be necessary, given that it has been allocated since 1997?

2.33 Yes. There appears to be no evidence of this site being brought forward. Further details are included at **Appendix One**.

3. CONCLUSION

- 3.1 This hearing statement has been prepared by Boyer and is submitted on behalf of Ipswich School following the representations made to the Ipswich Local Plan in March 2020.
- 3.2 Ipswich School has not attempted to answer every question in relation to this matter, but has instead focussed on those relevant to the representations submitted in March 2020 and the interest of the school as an education provider, charity and landowner.
- 3.3 This hearing statement focuses on the issues identified by the Inspectors under Matter 6: Site Allocations. It should also be read in conjunction with other hearing statements submitted on behalf of Ipswich School under Matter 2: Spatial Strategy and Matter 3: Housing Provision.
- 3.4 Land at Tuddenham Road is currently allocated for Sport and Open Space provision which is not in the best interests of Ipswich school, due primarily to the cost implications or relocating facilities from the existing site at Notcutts Field.
- 3.5 Reallocating land at Tuddenham Road for residential use will ensure that opportunities for housing development are increased across Ipswich Borough but also provides greater assurance for Ipswich School through a positive and appropriate allocation.
- 3.6 As a charity, Ipswich School is committed to opening up access to the School to any worthy pupil, regardless of their ability to pay. The School sees this as a major contribution to education in Suffolk, which helps address social mobility and allows pathways to be opened up to deserving pupils. Ensuring that land is allocated for the most appropriate uses will ensure the charitable objectives of the School are maintained for the community.
- 3.7 It remains the view of Ipswich School that the emerging Ipswich Local Plan is not justified and the allocation of land for Sport and Open Space at Tuddenham Road is undeliverable. Ipswich School respectfully request that the allocation is revised to residential uses as this meets the Council strategy and is considered to be a site which will deliver housing opportunities over the plan period.
- 3.8 Ipswich School would welcome the continued participation in the preparation of the Ipswich Local Plan to consider any amendments to policy wording and supporting text that relates to the land holdings of the School following the closure of the hearing sessions.

**APPENDIX ONE – SITES ALLOCATED IN DRAFT
LOCAL PLAN WHICH HAVE FAILED TO DELIVER
DESPITE ALLOCATION SINCE 1997**

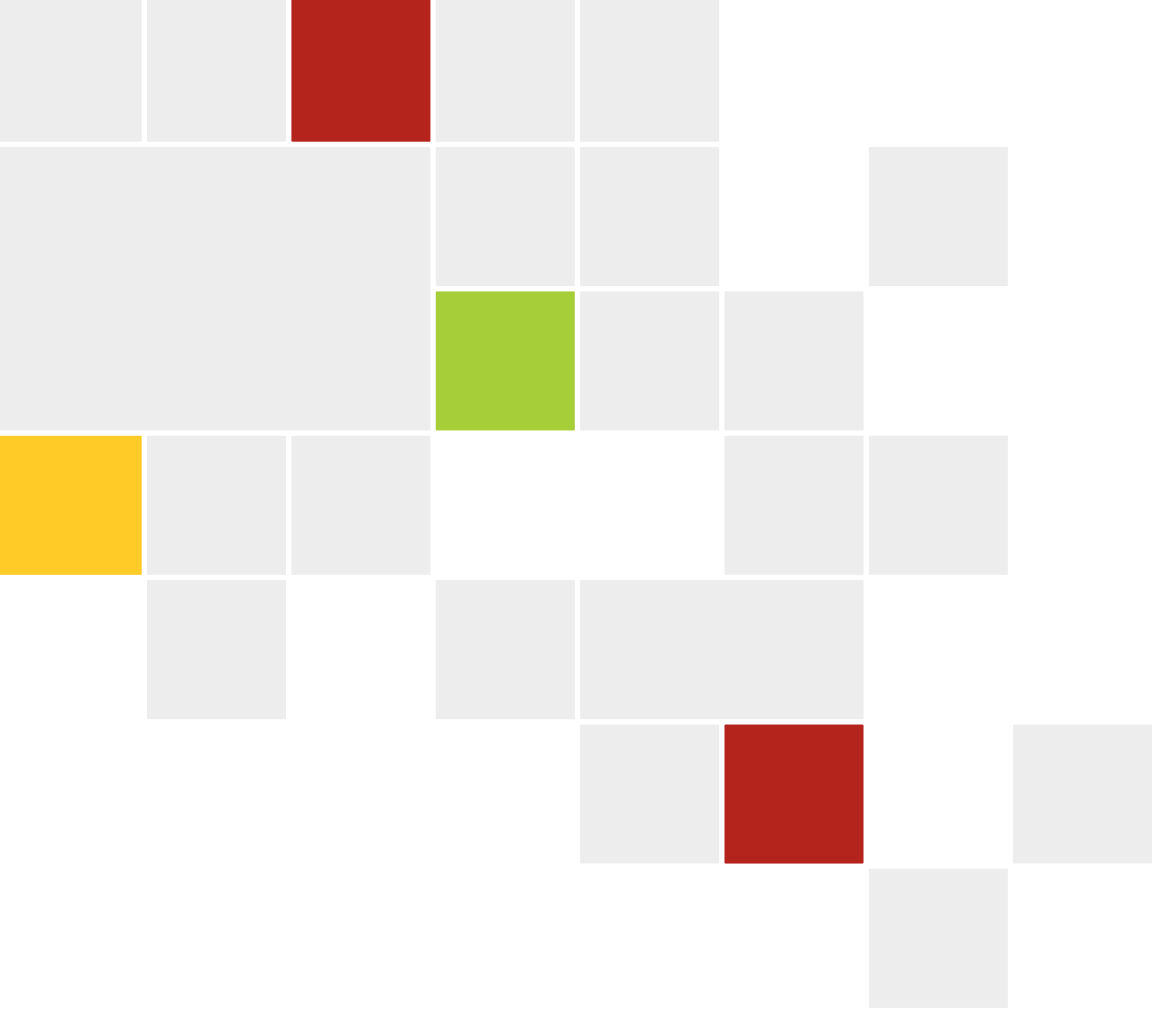
Site ref.	Site name and development description	Indicative capacity (homes)	Boyer Comments March 2020 Representations	Boyer Comments November 2020	Summary
IP009	Victoria Nurseries, Westerfield Road	12	<p>Allocated in 1997 Local Plan as part of site ref: 6.8, despite which has remained undeveloped.</p> <p>Displacement of existing nursery use would be required.</p>	<p>Application IP/19/01080/FUL granted on 24/01/2020 for continued temporary use of the site as a garden nursery and shop until 31/12/2020. Planning condition requires buildings to be demolished by this date and land left clean and tidy so as not to prejudice the housing allocation.</p> <p>No further application to extend the temporary permission further appears to have been submitted to date.</p>	<p>The planning condition attached to the planning permission demonstrates how IBC are encouraging the site to be brought forward for residential development.</p> <p>However, it is noted that in a recent press release dated 30 August 2020, it appears that the site could potentially be developed and become a 76 bed care home (https://www.ipswichstar.co.uk/news/care-home-plan-for-garden-centre-1-6815022) Therefore the site should not be relied upon for the delivery of housing within the emerging Local Plan.</p>
IP011c	Smart Street, Foundation Street (North) Allocated for residential development Site IP011b has been split to reflect the ownerships.	7	Allocated in 1997 Local Plan as part of site ref: 5.8	Application IP/20/00120/FPI3 granted on 06/04/2020 for the continued use of the land as a short stay car park until 06/04/2022. This site is owned by IBC. No evidence of allocation being brought forward at this stage.	The site is owned by IBC and has temporary planning permission to operate as a car park until 2022. No reference is made to the site allocation on the Decision Notice and there does not appear to be any evidence of commitment to deliver the site at this stage. For these reasons and given the site has been allocated for 23 years and not come forward to date, it should not be relied upon for the delivery of housing within the emerging Local Plan.

IP012	Peter's Ice Cream	35	Allocated in 1997 Local Plan as part of site ref: 5.11. Whilst parts of wider site have come forward, and signs of potential development have been apparent, it is noted that the site does not yet benefit from planning permission.	<p>Application IP/20/00629/FUL was refused on 23/09/2020 for a temporary car park on part of the site.</p> <p>Based on the planning history on the Council's website, it does not appear that planning applications have been submitted for the redevelopment of this site.</p>	There is no evidence of this site being brought forward for residential development despite surrounding developments being completed. Given the site has been allocated for 23 years and not come forward to date, it should not be relied upon for the delivery of housing within the emerging Local Plan.
IP035	Key Street / Star Lane / Burtons (St Peter's Port)	86	Allocated in 1997 Local Plan as site ref: 5.6. Site lies between two busy roads as part of one way network, which may form constraint.	<p>The site is currently used as a car park for the residents of Cardinal Lofts. No application has been forthcoming for the residential redevelopment of the site to date.</p> <p>The site promoter (Cardinal Lofts (Mill) Ltd) submitted representations (ref. 26566) stating that the site has a greater capacity than indicated and that increased residential capacity will be necessary to make the development viable due to abnormal costs with archaeology, hydrology, listed buildings, land contamination, flooding, air quality and design restriction. Also requested for the site allocation to include reference to a need to incorporate an element of car parking for residential units on this</p>	<p>This is a highly constrained site. There are concerns over the viability of the site as it would not be appropriate to increase the height of buildings as requested by the site promoter due to detrimental impact on heritage assets.</p> <p>For these reasons and given the site has been allocated for 23 years and not come forward to date, it should not be relied upon for the delivery of housing within the emerging Local Plan.</p>

				<p>and adjacent sites (IP206 and IP211).</p> <p>Site promotor representations (ref. 26572) state that site IP035 is capable of accommodating buildings of more than five storeys without having adverse impact upon the setting of adjacent listed buildings / historic environment. However, this remains to be proven and there are clearly viability constraints with the redevelopment of the site.</p>	
IP037	Island Site Allocated for housing and open space alongside existing Marina and small commercial uses to support enterprise zone.	421	<p>Allocated in 1997 Local Plan under site refs: 5.1 and 5.2.</p> <p>The need for additional access arrangements is noted and may represent constraint.</p>	<p>No application appears to have been forthcoming for the residential redevelopment of the site to date.</p> <p>Site promotor representations (ref. 26656) state that the vision for the site (agreed with partners and LEP) does not envisage 'high density' development and the indicative capacity of 421 homes is considered too high. The site promoters consider the Island Site will deliver reduced density of approx. 150 units and that the development should be sensitive to existing site uses. The site promoters disagree with the requirement for a road bridge and state that reduced density may not require additional access. The promoters request that the capacity</p>	<p>The site promotor has requested to reduce the allocation from 421 to 150 units (a reduction of 271 units). It appears that some work has been undertaken on the site to demonstrate commitment to bringing the site forward in the long-term at a reduced capacity. If the site does come forward for 150 units it is anticipated that this will be towards the end of the plan period.</p>

				of site IP037 be reduced to 150 units.	
IP054b	Land between Old Cattle Market and Star Lane	23	Allocated in 1997 Local Plan as part of site refs: 5.9 and 5.10	No application appears to have been forthcoming for the residential redevelopment of the site to date.	There is limited information about this site and given the site has been allocated for 23 years and not come forward to date, it should not be relied upon for the delivery of housing within the emerging Local Plan.
IP132	Former St Peters Warehouse Site, 4 Bridge Street	73	Allocated in 1997 Local Plan as part of site ref: 5.3. Lengthy vacancy with no signs of coming forward, despite allocation since 1997.	Application 20/00412/FPI3 granted on 11/09/2020 for continued use of the land as a car park until 31/08/2022. The site is owned by IBC. No application appears to have been forthcoming for the residential redevelopment of the site to date. The site is in Flood Zones 2 and 3.	The site is owned by IBC and has temporary planning permission to operate as a car park until 2022. No reference is made to the site allocation on the Decision Notice and there does not appear to be any evidence of commitment to deliver the site at this stage. For these reasons and given the site has been allocated for 23 years and not come forward to date, it should not be relied upon for the delivery of housing within the emerging Local Plan.
IP136	Silo, College Street	48	Allocated in 1997 Local Plan as part of site ref: 5.3. Fire damaged buildings and lengthy vacancy with no signs of coming forward, despite allocation since 1997.	Application 20/00412/FPI3 granted on 11/09/2020 for continued use of some of this site as a car park until 31/08/2022. The land is owned by IBC. No application appears to have been forthcoming for the residential redevelopment of the site to date. The site is in Flood Zones 2 and 3.	The site is owned by IBC and has temporary planning permission to operate as a car park until 2022. No reference is made to the site allocation on the Decision Notice and there does not appear to be any evidence of commitment to deliver the site at this stage. For these reasons and given the site has been allocated for 23 years and not come forward to date, it should not be relied upon for the delivery of housing within the emerging Local Plan.

IP150d	Land south of Ravenswood – Sports Park (part adjacent to Alnesbourn Crescent only – to be master planned)	34	Allocated in 1997 Local Plan as part of site ref: 6.1. Remainder of Ravenswood community has been built out, but several parcels remain undeveloped.	No application appears to have been forthcoming for residential development on the site adjacent to Alnesbourn Crescent.	The site has been allocated for 23 years and not come forward to date, it should not be relied upon for the delivery of housing within the emerging Local Plan.
1P150e	Land south of Ravenswood (excluding area fronting Nacton Road) – to be master planned	126	Allocated in 1997 Local Plan as part of site ref: 6.1. Remainder of Ravenswood community has been built out, but several parcels remain undeveloped.	No application appears to have been forthcoming for residential development on the site.	The site has been allocated for 23 years and not come forward to date, it should not be relied upon for the delivery of housing within the emerging Local Plan.
Total		865			



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