

### **Q91.**

See our Matter 2 Statement.

### **Q92.**

Assuming a build rate of circa 80 dwellings pa, the site would have a build period of up to 7 years (including preliminary works prior to housing construction). Therefore to be complete by 2036, it would actually be possible to delay commencement until potentially as late as 2029.

It is our understanding that the only substantive infrastructure limitation on commencement of the site (that would not be directly addressed by the HDL development itself) relates to a current lack of available primary school places. Because the IGS is due to provide three new primary schools that constraint will be addressed as the IGS progresses, and there is consequently no requirement for an additional primary school site at the HDL site.

Clearly in the event that the IGS does not make substantive progress, then not only would the issue of primary school places not be addressed, but there would be a significant shortfall in housing provision generally that would need to be addressed by an urgent review of the Plan as a whole. In that context, it is possible that other alternatives to providing primary school capacity could be considered, including a primary school on the HDL site itself, or indeed in the absence of significant development in the IGS, the issue of primary school capacity might be resolved anyway (eg through expansion of existing schools).

But at the current time there is no need to consider such alternatives because progress is being made on all three of the IGS neighbourhoods, and sites for primary schools are being secured in the respective planning permissions (NB once land is transferred to the Education Authority under the respective s106 triggers, it is essentially down to the LEA to determine the phasing of additional school places, and so after transfer the rate at which school places are provided is not tied to the rate of development within the IGS, but rather additional places would be brought forward to reflect the expected speed of growth in the area).

### **Q94(a).**

As per our response to Q92, the IGS is due to provide 3 new primary schools and this will create the required capacity. Therefore there is neither a need nor would it be desirable for additional primary school capacity within the HDL site itself.

In reality, where children actually go to school is more complicated, as schools are not necessarily always providing places for just children in the immediate area. The closest existing primary school to the HDL site is actually Rushmere Hall Primary School, located on Lanark Road, which is under 500 metres to the nearest part of the site. The SoCG between IBC and SCC Highways (ref: I17) proposes that safe crossing points be provided on Humber Doucy Lane so that the school can be accessed on foot. Given the close proximity of this school to the site, it is anticipated that many of the primary school aged children from the proposed development may eventually go to this school, once primary school capacity in the area generally is increased.

### **Q94(b).**

We note from the SoCG between IBC and NHS/CCG that the NHS has not identified any need for new on-site facilities in relation to the HDL allocation, and instead intends to rely on increasing capacity

elsewhere through development contributions (which is the same as the approach already being deployed in the IGS through the agreed s106s).

Based on the SoCG, it is our understanding that there is no requirement for an on-site medical centre, but that the NHS/CCG are seeking flexibility as to where contributions are spent.

In the absence of any identified need for an on-site facility, it would be misleading for the policy to include provision for “healthcare facilities”, because that is not what is being sought, but could refer to a “contribution towards increased healthcare capacity”. If our understanding is wrong, and on-site provision were being sought or remained a possible requirement, then the correct wording in the policy would be “Safeguarding of land for a health facility and/or appropriate financial contribution towards health care capacity”.

### **Q94(c).**

The HDL site benefits from good accessibility to services and facilities with two local centres within reasonable walking distance. The Selkirk Road Local Centre, located to the south-east has a convenience store, bookmakers, newsagents, barber shop, takeaway, charity shop and public house and is 400m from the nearest part of the site (but we accept of course that the majority of the site is beyond 400m). The SoCG between IBC and SCC Highways (I17) recognises that it has a good range of local shops and facilities and identifies the need for a safe and suitable waling route to this Local Centre, potentially with a crossing point for Humber Doucy Lane. The Colchester Road Local Centre, located to the south-west includes a convenience store, a shop, a hair and beauty salon and a place of worship and is around 900 metres from the site. Additional facilities are proposed at Ipswich Garden Suburb. Therefore, the residents of the new development will be able to access other local centres in the vicinity.

We actually have no objection to the site providing a small scale local centre. In fact, a comment in the supporting text to the effect that, subject to consideration of the potential impact on the viability of existing local centres protected under Policy DM30, the Council would support a local centre on the site, would be helpful. But we do not consider a local centre *necessary* to the successful development of the site, and on that basis, it should not be a policy requirement.

### **Q95.**

Policy ISPA4 identifies at criterion (d) that transport measures are to include highways and junction improvements on Humber Doucy Lane and Tuddenham Road, walking and cycling infrastructure to link to key destinations including the town centre, and public transport enhancements.

The SoCG with SCC (Infrastructure) (ref: I17) sets out further information on these measures, principally in terms of the expectation for bus access (as per our previous representations there are already bus services along Humber Doucy Lane and Tuddenham Road) and connectivity for walking/cycling. These measures are consistent with the overall mitigation strategy for Ipswich (D39) which concentrates on promoting non-car mitigation measures.

In terms of junction improvements, the only substantial intervention that we are aware of from ongoing liaison between KCL’s highway consultant and SCC Highways are works to improve the junction of Tuddenham Road and Humber Doucy Lane (as noted in I17). As KCL controls land on both sides of the exiting junction, no significant delivery issues are anticipated.

The measures identified in I17 are considered to be reasonable and commensurate to the scale and nature of the proposals, and are readily deliverable. The deletion of the word “challenging” is therefore correct.

### **Q96.**

At this stage, the viability assessment work undertaken on behalf of the Council by Aspinall Verdi (D42) acknowledges that the detailed cost of the infrastructure package for the HDL land is not finalised (para 5.69). However, that study concludes that development is viable because it projects a £27,000/unit surplus (para 5.72) with 30% affordable, from which infrastructure can be funded.

As the appraisal is not based on a specific cost plan, there is no need for amendments in relation to healthcare. For context though, the healthcare contribution for the Henley Gate and Fonnereau Neighbourhoods in the IGS amounted to £390/unit, and so it can be seen that the scale of the healthcare contribution would not significantly affect viability.

The more detailed viability appraisals undertaken for the two nearby IGS sites casts some doubt on the accuracy of the AV high level viability modelling. However, what these appraisals also prove is that, notwithstanding the reduced affordable housing provisions agreed in those particular cases, large-scale greenfield development in this location is viable. It is likely that the relative development costs for the HDL site will be less than the IGS sites.

### **Q97.**

Policy DM11 is a development management policy for control of development in the parts of the Plan designated as “Countryside”, which by definition does not apply within the ISPA4 allocation area. We see no need for any amendment to ensure consistency accordingly.

Separation between the ISPA4 allocation site and surrounding settlements is achieved because substantial areas of open countryside would be maintained between the site allocation and other settlements (protected under the adopted Suffolk Coastal Local Plan).

The nearest village is Rushmere St Andrew, which already lies very close to the Ipswich urban area. The Parish Church effectively marks the western edge of the village, and is only 200m from the junction of Humber Doucy Lane/The Street, on the edge of Ipswich. By contrast, the closest part of the ISPA4 allocation to Rushmere St Andrew is some 450m away, and separated by the open fields south of Seven Cottages Lane. More typically Rushmere St Andrew lies over 650m away to the east of the closest part of ISPA4, and is separated by agricultural land. The villages of Westerfield and Tuddenham are further away and equally separated by open countryside.

### **Q98.**

We note the contents of the HIA included within the SoCG between HE and IBC (I30). From that SoCG it can be deduced that HE is now satisfied that the impact of the development on Heritage Assets has been fully assessed.

We do not disagree that the HIA at I30.3 provides a reasonable baseline assessment of the heritage assets in the area. The HIA confirms that the designated heritage assets that are potentially affected (the four Listed Buildings named in the HIA) are the same designated heritage assets already identified in the Site Sheet for ISPA4.1. Therefore the HIA confirms that the significance of key

heritage assets had already been recognised in the Plan. The HIA however provides a fuller assessment of the potential effects on designated and non-designated assets.

In terms of the findings of the HIA, however, it is important to recognise:

- (1) That as noted at paragraph 4.1, the assessment can only view the proposed allocation in broad terms, in the absence of a specific proposal, and therefore further impact assessment work will be required at the application stage; and
- (2) That the assessment effectively sets out the mitigation that the authors suggest would be required to allow development to occur “without causing harm to the significance of heritage assets” (i.e. essentially zero impact on built heritage). The report identifies that, without mitigation, the harm that *could* arise would fall in the “less than substantial” category. Where harm to a heritage asset falls in that category (regardless of which end of the scale of “less than substantial” the harm is assessed to lie at), the correct test for the decision maker under the NPPF para 196 is to assess the public benefits of the scheme against any harm. Therefore it is not necessarily the case that, in due course, all of the mitigation suggested in the HIA to achieve zero harm would be required, as there is a wider planning balance to be undertaken. There is also a balancing exercise to be undertaken under paragraph 197 in respect of any harm to non-designated heritage assets. Therefore again, in the balance, the mitigation suggested in the HIA (which is to achieve zero impact on non-designated assets) may well not need to be as extensive.
- (3) The development will not include vehicular access to Tuddenham Lane, Seven Cottages Lane or the bridleway (as assumed at the bottom of page 2).

In essence the HIA demonstrates that the site could be developed with no adverse impact at all. But achieving zero harm is not the correct test for determining the suitability of the scheme at the application stage.

Turning then specifically to the second and third parts of the question, the proposed modifications to the Site Sheet for ISPA4.1 do appear to fully reflect the recommendations of the HIA, but for the reasons given above, our contention is that it is not necessary or appropriate to apply the recommendations verbatim, because the detail of the mitigation required will be more properly dealt with in the context of the application HIA in due course (or in the Masterplan). What is necessary now is for the policy and the supporting text to provide the appropriate context for the more detailed HIA work to occur at the appropriate time. Due to the word limit we have not provided our edited version of the suggested amendments to the Site Sheet in the IBC/HE SoCG, but would be happy to do so.

Although Masterplanning work is still at an early stage, we are already aware that the parts of the site that the HIA identifies as sensitive (e.g. the part of the site immediately east of Allens House/Lacey’s Farmhouse, or east of Seven Cottages) coincide with parts of the site that we are already identifying as areas for sustainable drainage and associated open space, and which will contribute to the ‘green trail’. The effects of the HIA mitigation on the Masterplan for the site are

likely to be minimal therefore as the areas of sensitivity already correlate with areas likely to substantially form green space.

**Q99.**

The response from SCC's specialist advisor on archaeology raises no objection in principle to the development of the site on the grounds of archaeological sensitivity. Rather, as explained in the revised SoCG (I15), the aim is simply to ensure that any archaeological matters are properly assessed prior to the application stage. On that basis, we consider the issue of archaeology has been fully considered, and is deemed by the relevant experts to be a matter that can be addressed at the planning application stage.

The text in the SoCG accepts that the proposed additional wording put forward for inclusion in the supporting justification is not required for soundness, but is considered to provide helpful information.

**Q100.**

The provisions of Policy DM5 and ISPA4 cover the need to consider any replacement land required for the Rugby Club.

KCL has maintained contact with the Rugby Club over many years and has previously discussed the possibility of relocation or replacement facilities in the event that the land is allocated for development. KCL controls significant areas of additional land within the immediate locality which could provide either replacement or additional facilities to meet the Club's requirements, and KCL is happy to continue to liaise with the Rugby Club regarding the most appropriate options.

**Q101.**

In our view the policy framework should be sufficiently flexible to enable the Masterplan to include green infrastructure outside of the allocated site boundary. This flexibility would provide the Masterplan with the option of considering whether, for example, support for the Rugby Club can best be provided at the existing facilities or through re-location to neighbouring land, or provide the opportunity to consider alternative locations for SANG provision that may provide better options than on-site provision, or provide greater benefits for the Green Trail.

We do not think that as written IPSA4 is necessarily seeking to prevent the opportunity of green infrastructure outside the allocation boundary but it would benefit the effectiveness of the policy to be clear that the area that the Masterplan may cover may exceed the allocation boundary itself, in respect of green infrastructure provision only.

**Q102.**

The ecological value of the site is identified as low (A1.5). It primarily comprises either arable farmland or short-cut amenity grass. Opportunities for enhancements are set out in the recommendations of the Wildlife Audit (D21) for this site, such as habitat creation through the SuDs network, wildflower planting, and other elements of green infrastructure (ref: D21). The Masterplan for the site therefore has the ability to achieve net biodiversity gains, in accordance with DM8.

With regard to DM10, the Masterplan for the site will utilise the disposition of open spaces to contribute towards an accessible green corridor that links the site to the open countryside and that provides an accessible route around the site to contribute towards the Green Trail.

**Q103.**

Agricultural land – With the exception of areas of heathland and woodland, essentially all agricultural soils in the Ipswich/East Suffolk area are Grades 2 or 3, and therefore all development outside existing built up areas will represent a marginal loss of high quality agricultural land.

Ecology – the site has low ecological value and provides opportunities for enhancements.

Air quality – the AQ Assessment gives appropriate consideration to air quality across the whole of Ipswich, taking into account the projected traffic impacts of all development, and concludes that with the mitigation set out in D39, no significant issues are expected. There is no evidence to suggest any specific issues arise in respect of the HDL site.

Road network and traffic – the highway modelling assesses the impact of all proposals within the Local Plan, from which the mitigation strategy (D39) is derived. No substantive off-site highway measures are identified as being required in respect of this site.

Local Services and Facilities – the development can help to support local centres in the vicinity. Impact on health and education services would be mitigated through contributions to additional capacity in the normal way.

Flood risk/drainage – the site is in Flood Zone 1. The surface water drainage strategy for the site will use SuDS to control run-off rates to pre-development levels to ensure no increase risk off-site, and the principles of this strategy have already been discussed and agreed with the LLFA. Foul drainage will connect in to the existing nearby adopted network.

**Q105.**

On the assumption that the Site Sheets are intended to provide additional clarification and guidance regarding the development of each site (rather than policy), we consider them to be a useful addition in terms of explaining how constraints and opportunities may be addressed, outside the formality and precision of Policy.

**Q106.**

It would be logical for all site allocations to be listed in Policy SP2, and cross referenced to the appropriate Site Sheet at the end of the SAP.