

78. What evidence is there to support the deliverability and developability of the IGS during the Plan period?

The IGS is of course already a Local Plan allocation, having been included in the previous iteration of the Core Strategy and Development Management Plan which was adopted in February 2017.

Since then:

- The Council has adopted the accompanying Masterplan as SPD;
- Two strategic outline applications have been progressed, with the s106s now completed and permissions issued as of January 2020; 1,915 new homes now have Outline permission;
- A Delivery Board for all major stakeholders has been established;
- Reserved Matters for the first elements of Henley Gate neighbourhood have already been submitted. Reserved Matters applications for Fonnereau are expected next year;
- An Outline Application for Red House Farm is being prepared and is expected to be submitted in Spring 2021;
- Government funding has been secured for key infrastructure.

The existence of two major Outline permissions for 1,915 homes provides clear evidence of the *developability* of the IGS, as these consents have been granted following detailed scrutiny of the impacts of development and the requisite mitigation/infrastructure required.

The activity undertaken since allocation in 2017 and the work that has been achieved to date provides clear evidence of the investment being directed to successful delivery by all parties, and also of the economic *deliverability* of the development, since both Outline applications have demonstrated that the development is deliverable (provided there is flexibility in respect of affordable housing – see Q83).

As an experienced housebuilder, Mersea Homes Ltd have provided their estimate of completion rates in the SoCG with IBC (I19), and which essentially supports the trajectory given for the Red House Neighbourhood in the Council's latest monitoring report (E1).

80. The Ipswich and East Suffolk Clinical Commissioning Groups (CCGs) state that the opportunities for establishing a new health centre in the IGS are severely reduced and primary care would be provided for new patients at the Two Rivers Medical Centre and the new health centre proposed at the Tooks Bakery site. Given that the SoCG [I4] says that it is not reasonable to rely on the latter as part of the infrastructure strategy at the IGS, what measures are in place to ensure that the requirement for healthcare provision set out in Policy CS10 and Table 8B would be provided?

The Outline Planning Permission for Fonnereau Neighbourhood includes the ability to provide a health centre on site, but as we understand the NHS/CCG position, their preference is to use the funding being made available via the IGS permissions (secured through the respective s106 agreements) to create capacity at the named surgeries off-site. It is therefore the NHS/CCGs investment preferences that reduce the potential for an on-site facility, not the availability of a site for a health care facility per se.

81. As the proposed development of the IGS is required to contribute towards the Recreational Avoidance and Mitigation Strategy (RAMS), in addition to the provision of the Country Park and other on-site open space, how would this be secured and should reference to it be included in Policy CS10 and Table 8B?

The existing Outline permissions for Henley Gate and Fonnereau are premised on the new Country Park providing the necessary mitigation for recreational disturbance on-site as part of the development, rather than through an off-site contribution (other than an off-site monitoring contribution). As we understand the RAMS SPD (G6), this form of site specific mitigation remains an option instead of the tariff (section 3.6).

82. Does Policy CS10 defer important policy matters relating to the development of the IGS, including infrastructure requirements, the location of the district and local centres and the phasing of the development to the SPD? Having regard to Regulations 5 and 6 of the Town and Country Planning (Local Planning) (England) Regulations 2012 should these matters be included in the Local Plan?

No.

Policy CS10 relates to a single mixed use strategic allocation within the area defined by the Policies Map. It is not necessary, nor is it desirable, for the Local Plan to seek to micro-manage the specific location of individual elements within the overall site-wide allocation, not least because it is not supported by an evidence base that is sufficient to justify setting specific land use parcels for specific uses within the overall allocation area. As per our original written representation, the Policies Map should at most be showing indicative locations for facilities within the overall allocation area.

Provided that the SPD is properly used as guidance and a material consideration in relation to the determination of planning applications, then it is not making site allocations (or introducing development management policies), and therefore it is not in conflict with Regulations 4 and 5. Rather, it is performing the proper function of an SPD in helping to give guidance as to how a Local Plan policy can be effectively implemented.

In order to ensure that the SPD is not being treated as a de facto site allocations document contrary to the Regulations, amendments are required to the wording of Policy CS10 as per our written representations.

In terms of infrastructure provision, as far as we are concerned, all essential elements of infrastructure required for the development are set out in CS10 and Table 8B, and therefore we do not consider that any material infrastructure requirements are deferred to the SPD. The tables in the SPD relating to infrastructure requirements are essentially the same as the items set out in Table 8B (except that the latter is more up to date).

83. What evidence is there to demonstrate that the development of the IGS would be viable and that the target of 31% affordable housing would be deliverable, given that planning permissions for the first two phases provide for 5% and 4% affordable housing only?

Given that it was produced in January 2020, after the Council had negotiated the s106 agreements for Henley Gate and Fonnereau, and contemporaneously with the issue of the s106 agreements for those sites, it is difficult to understand why the AV Viability Assessment (D42) ignores the detailed evidence available from the two viability assessments produced in respect of those permissions.

As identified in our original written submission, the greatest area of discrepancy between the agreed site specific appraisals and AV relates to infrastructure costs (where as per our original representation, the AV appraisal includes a small element for extra over costs, but makes no allowance for strategic infrastructure), but for the record, the AV appraisal:

- Assumes higher market values than agreed for either Henley Gate or Fonnereau;
- Assumes higher values for the affordable housing elements;
- Assumes unrealistic finance costs.

As per our original representation, it is now not mathematically possible to provide 31% affordable housing within the IGS based on current policy, as set out in the table below.

Site	AH provision	AH units
Henley Gate Phase 1	5% of 400 total	20
Henley Gate remainder after phase 1 viability review.	5% minimum of 700 units (i.e. 35 units, which are forward provided in phase 1) and up to 35% of 700, including the 35 units forward provided in phase 1 i.e. 245 in total).	245
Fonnereau Phase 1	4% of 455	18
Fonnereau remainder after phase 1 viability review.	4% minimum of 360 units (i.e. 15 units, which are to be forward provided in phase 1) and up to 35% of 360 units, including the 15 units forward provided in phase 1 i.e. 126 in total).	126
IGS remainder	31% of 1585 (3500-1915)	491
Total AH Units		900
Total %	900/3500	25.7%

However, the theoretical mathematical maximum is not a realistic policy target, because:

- Although it is true that there is a prospect of later phases at Henley Gate and Fonnereau showing an improved viability, there is no realistic prospect of viability changing so much from the recently agreed viability appraisals as to suggest that 35% on other phases will be achievable, particularly as the only basis for suggesting otherwise is the AV assessment which we know has excluded the required strategic infrastructure costs;

- (b) From our work to date on the Outline application for Red House Farm, it is apparent that build costs, infrastructure costs and sales values have not changed materially since the position agreed with the Council in respect of the Henley Gate and Fonnereau assessments, and therefore we expect Red House Farm to contain a similar viability assessment;
- (c) It is not reasonable or CIL compliant for developers of others sites within the IGS to remedy any shortfall in affordable housing provision arising from consented schemes.

We do not consider it unreasonable for Policy CS10 to set an aspirational target for affordable housing. But it also has to be realistic and compatible with the most reliable evidence (which in this case comprises the bespoke site specific appraisals, rather than the AV Whole Plan assessment).

From the table above it can be seen that the theoretical maximum that can be delivered under the existing consents is 21% (409 units out of 1915). In the absence of any substantial evidence that other parts of the IGS would be subject to materially different levels of viability, it is reasonable to assume that, although in theory the remainder of the IGS could be developed at 31%, it too would only be viable at the same aggregate maximum level of 21% as the recently granted consents.

With that in mind, and in order to ensure that the wording in respect of viability reviews properly reflects the actual process that has already been established, we consider that the CS10 wording in relation to the affordable housing requirement should be amended as follows:

~~“Overall, The Council will require a minimum of 5% affordable housing but will seek up to 21% 31% affordable housing at Ipswich Garden Suburb. F for each individual planning application. The level of affordable housing should be the maximum compatible with achieving the 21% overall target and achieving viability, as demonstrated by an up to date viability assessment which has been subject to independent review.~~

Where a development is of sufficient size and is therefore to be implemented in more than one viability phase, the re-testing of the viability will occur prior to the commencement of subsequent viability phases within that planning permission, in accordance with the triggers to be set out in the relevant s106 agreement. pre-implementation of individual applications within each neighbourhood. Each viability phase of development within the relevant planning permission will be subject to a maximum cap of 35% affordable housing. The Council will seek a mix of affordable dwelling types, sizes and tenures in accordance with policies CS8 and CS12.”

The above would give a policy that although still optimistic (as even achieving 21% on remaining sites is not yet proven to be possible), is at least mathematically feasible and a reasonable target to aim for, based on the evidence of the agreed Henley Gate and Fonnereau viability assessments.

It will be noted that we have sought to clarify the use of the word “phase” within the policy to mean a viability phase within an overall application (as this is the term used in the s106 agreements in relation to development to be carried out in more than one stage). The use of the word “phase” to refer to different sites within the IGS is confusing, as there is nothing in the policy or SPD that requires different sites to come forward in any particular order. Also, as noted previously, it is not appropriate for later development to provide in excess of the policy target in order to remedy any under-provision by other developers on earlier sites.

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

See Q78

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

As per our response to Q78, we consider the housing trajectory, in so far as the Red House Farm Neighbourhood is concerned, to be realistic.

The policy itself sets no phasing. The SPD acknowledges that development can occur in all three Neighbourhood simultaneously, provided that each is delivering the requisite infrastructure for that Neighbourhood in a timely manner (the detail of which is governed by the respective s106 agreement/conditions). This ensures a practical and effective approach to sequencing that avoids unnecessary over-prescription and assists speedier delivery. The use of the term "phase" to describe different sites within the IGS is confusing.

86. Should the Secondary School Site be shown as a broad location rather than a specific allocation on the Policies Map?

Yes, as per our written representation and our response to Q82.

87. Has the potential impact of Sizewell C been considered in respect of rail freight transport passing through the site on the Ipswich to Westerfield line?

Yes, in respect of Red House Farm. Red House Farm is already bounded by freight traffic on the Felixstowe spur which will affect the proximity of residential properties on the site to the line. The main line is further away than the Felixstowe branch and therefore poses no extra constraint.