

Ipswich Local Plan Review Examination - November 2020

Position Statement

Of The Ravenswood Environmental Group

MATTER 6

Matter 6: Site Allocations

Issue: Whether the proposed site allocations in the SAP are justified taking into account the reasonable alternatives, positively prepared in meeting the Borough's development needs, effective in terms of deliverability over the Plan period and consistent with national policy in enabling sustainable development?

Introduction

- 1.1 The Ravenswood Environmental Group (TREG) speaks for residents and interested parties opposed to the Local Plan Review on planning and environmental grounds. It is considered that the Local Plan should not be adopted and is not sound. The plan may be improved but the changes required would indicate that a new plan and a new approach is required to plan properly for growth infrastructure and environmental protection.
- 1.2 TREG is concerned that the Local Plan proposes a piecemeal collection of poorly presented proposals for the Ravenswood Neighbourhood which the Council has intentionally and repeatedly separated and concealed in this badly structured illegible plan. These very obvious criticisms of the structure content of the Local Plan have been ignored in previous consultations.
- 1.3 TREG has formulated its objections on the lack of cooperation, lack of justification and poor presentation of the plan AND thereafter has criticised the plans proposals for the Ravenswood Neighbourhood.
- 1.4 The main "allocation" part of the plan is the snappily titled IPSWICH BOROUGH COUNCIL LOCAL PLAN SITE ALLOCATIONS AND POLICIES (INCORPORATING IP-ONE AREA ACTION PLAN) DEVELOPMENT PLAN DOCUMENT REVIEW – FINAL DRAFT. Hidden within this document and its appendices are the Ravenswood Neighbourhood proposals to which TREG objects:

Policy SP1 The protection of allocated sites Page 16

Policy SP3 Land with planning permission Page 30

IP150a "Ravenswood U, V, W" – 94 Dwellings- Table 2 Page 31

Policy SP2 Land allocated for housing Page 17

IP150d "Land South of Ravenswood Sports Park" – 34 dwellings Page 26

IP150e "Land south of Ravenswood (excluding area fronting Nacton Road) – to be master planned" – 126 dwellings		Page 26
Policy SP5 Land Allocated for Employment Use		Page 37
IP150c "Land south of Ravenswood" - B1 (excluding office use B1a) and appropriate employment-generating sui generis uses - Table 3		Page 38
IP152 "Airport Farm Kennels" - B1 (excluding office use B1a), B2 or B8 – Table 3		Page 39
Policy SP7 Land Allocated for Leisure Uses		Page 43
IP150b "Land at Ravenswood" –Sports Park-	Table 5	Page 43
Policy SP8 Orwell Country Park Extension		Page 45
Appendix 3 Site Sheets		Page 112

- 1.5 Thus, 11 policy proposals, statements and allocations for Ravenswood totalling 30,000 sqm of industry, warehousing and sui generis uses plus a minimum of 254 new dwellings and a vague Sports Park are sprinkled throughout 11 separate pages of the plan without once highlighting that 5 of these allocated sites share common boundaries one with another. These geographically conjoined sites are IP150b, IP150c, IP150d, IP150e and IP152. They are "literally" divorced by this poorly presented plan. In addition, there is site IP150a (U,V,W) which is shown erroneously as benefiting from outline planning permission notwithstanding the fact that the last planning application for that site was submitted in 2007. Finally, the Orwell Country Park extension (IP149) is proffered as a ploy to reduce visitor pressure on the SPA when the preceding 6 sites do exactly the opposite.
- 1.6 TREG is concerned at the absence of comprehensive masterplanned approach to Ravenswood. The extent of development clearly impacts negatively on the SPA and the Sports Park is at the boundary with a designated Local Wildlife Site. We also consider that a comprehensive overview of Ecological and other Environmental Impacts is required now along with a masterplanned new access to the Nacton Road to ease congestion and improve Air Quality. The Appendices to the plan merely hint that a new access could be required and hint at masterplanning but only in the least certain terms. Paragraphs 4.10 and 4.11 of the supporting text serve only to highlight the lack of evidence behind the policy content.
- 1.7 Paragraph 16(d) of the NPPF states that Local Plans "should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals". Given the fact that the Borough Council owns a number of sites it is of grave concern that the planning policy here is so poorly presented that the Council does not understand its own policy. This obvious criticism has become crystallised in recent weeks with the Council's housing company submitting a planning application for site IP150a which fails to comply with the emerging local

plan, the old local plan, national planning policy or the opinion expressed in the recovered decision which previously refused the proposal.

Questions

IP150d – Land South of Ravenswood – Sports Park

146. Should the development of this site be co-ordinated with the housing development at IP150e and the employment development at IP150c?

1.8 It is absolutely essential that sites which adjoin on another should be both masterplanned together AND made the subject of a single comprehensive criteria based policy. Neither approach is evident in this Local Plan.

147. Has full consideration been given to the impact of the development of this site on the local highway network, sewage and drainage capacity, the AONB, ecology, local services and facilities and local wildlife?

1.9 No. Indeed, the evidence in Appendix 3 of the plan proves that none of the constraints or impacts have been assessed. The Appendix lays bare the failings of the site assessment and suggests that the allocation is not justified. Pages 234 and 235 of the Appendix set out reasons why the site should not be allocated.

148. Would the unusually shaped nature of this site impact upon the deliverability or capacity of the allocation?

1.10 The odd shape of the site cannot deliver a form of development consistent with the character of the locality. It ignores existing swales, ecology and the need to deliver a single point of access. To deliver this allocation as frontage development it would not be possible to fit 34 homes on the site using a varied and inclusive housing mix. However, development in depth would lead to a dead frontage backing on to the Sports Park Allocation. It seems as though the new housing is to be used as a buffer to existing homes but the environment of the new homes cannot be guaranteed without a clear understanding of what a Sports Park is supposed to be.

149. Would the proposed allocation provide an appropriate mix of housing?

1.11 The Borough Council is planning its current site U,V,W as a ghetto of affordable housing so there is clearly a very high risk that this site will be proposed in a non-inclusive and inappropriate way... with the further risk of the Council submitting a planning application to itself to propose a form of development which gives away the value of the land (at a cost to tax payers) and fails to be socially inclusive.

IP150e – Land South of Ravenswood

151. Should the development of this site be co-ordinated with the housing development at IP150d and the employment development at IP150c?

1.12 In any other Local Plan these three sites would be the subject of a single policy to deliver a comprehensive approach which mitigates the impacts of the developments. These sites require comprehensive and interconnected access, ecology and drainage solutions. Appendix 3 of the plan is simply a vague list of constraints which haven't been assessed and there is nothing in the plan to prohibit piecemeal development or to insist upon a masterplanned approach.

1.13 The Local Plan at Appendix 3 refers to masterplanning however it is not clear that the Appendix is part of the plan. At previous Examinations, Inspectors have concluded that an Appendix to the plan is not part of the Development Plan for the purposes of decision making. There is nothing in the plan to insist upon masterplanning or to set out what this process would be and the level of signoff or consultation required.

152. Would the proposed allocation provide an appropriate mix of housing?

1.14 No. The Council should insist upon socially inclusive housing in accord with the previous plans for Ravenswood which saw a blend of homes and a degree of tenure blindness in layouts.

153. Has full consideration been given to the impact of the development of this site on the local highway network, sewage and drainage capacity, the AONB, ecology, local services and facilities, climate change and local wildlife?

1.15 No. Pages 236 and 237 of Appendix 3 just set out the constraints and the reasons why this is not a justification allocation. It is really odd that the Council chooses to prove that the site is not justified (either alone or with other sites in the Appendix while continuing to allocate it in the Local Plan.

1.16 There has been no evidence based assessment of the impact on the Local Wildlife Site the SPA or the site itself of Ecology and protected species.

1.17 It is absolutely essential that there are specific highway improvements proposed including a new dedicated vehicular access to this mixed use growth area. The Local Plan (at its Appendix) merely suggests vague sustainable transport improvements. However, the Nacton Road corridor was widened to its maximum extent and includes a combined cycleway and footway so it is baffling to suggest that some further solution can be found.

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

1.18 The site was previously allocated for employment and was not marketed appropriately.

IP150a – Ravenswood U, V, W

163. Has full consideration been given to the impact of the development of this site on the local highway network, including the cumulative impact of other nearby development proposals, and local services and facilities?

1.19 No formal transport assessment or RSA has been carried out. The Council simply relies on the site's previous inclusion in a 2007 planning application and its planning application does not assess current or predicted traffic modelling.

164. Would the proposed allocation provide an appropriate mix of housing?

1.20 No. The current planning application for the site is for 100% affordable housing. A previous proposal was refused planning permission by the Secretary of State for its lack of social inclusion.

IP150c – Land South of Ravenswood

175. What is the justification for the allocation of this site for employment uses?

1.21 There is none. Appendix 3 just sets out reasons why the site should not be allocated.

176. Should the development of this site be co-ordinated with the housing developments at IP150d and the employment development at IP150e?

1.22 Refer to 1.12 above

177. Have the cumulative impacts on traffic, air quality, noise, heritage and ecology of the development of this site, along with the housing allocations at IP150d and IP150e, and the employment allocation at IP152 (Airport Farm Kennels) been fully considered?

1.23 No. In addition to comments above, there is no explanation why B1(a) uses are prohibited given that these are, by definition, compatible with Residential Uses.

178. How would the access to the site be provided? Would any access also serve the housing allocation at IP150e and the wider Ravenswood?

1.24 It looks like the plan is pointing to the use of the main access to the Ravenswood Estate which is already at gridlock because there is now a 24hr McDonalds situated on a confined site which cannot accommodate its queueing traffic. A new dedicated access to Nacton Road should be proposed. It seems logical that such an access would assist with air quality at the main roundabout.

IP152 – Airport Farm Kennels, north of the A14

179. What is the justification for the allocation of this site for employment uses?

1.25 Appendix 3 at page 239 sets out constraints but the plan does not contain a criteria based policy to overcome these. The traffic and environmental impact of this colossal proposal is potentially vast but no evidence is tabled to address this. Also, the Council uses the term "appropriate Sui Generis uses". What is this intended to mean ...Car Repairs, Petrol Filling Stations...?

180. Has full consideration been given to the impact of the development of this site on the local road network?

1.26 No.

IP150b – Land South of Ravenswood

185. Is the allocation of this site for a Sports Park justified?

1.27 There is no explanation of what a Sports Park is thus it is impossible to justify it. This proposal is literally adjacent to Residential Development and a Local Wildlife Site. The latter has experienced a recent history of vandalism and visitor pressure and a Sports Park could add to this.

186. Has full consideration been given to the impact of the development of a Sports Park on this site on the AONB?

1.28 No. The Sports Park is not defined so its full impact cannot be assessed.

187. Has full consideration been given to how access could be made to this proposed Sports Park?

1.29 This is not evidenced in the plan.

188. Has full consideration been given to the impact of the development of a Sports Park on ecology, as well as traffic congestion in the locality?

1.30 It is inevitable that the proposal would have a detrimental impact on Ecology as the site is biodiverse and is visually contiguous with the adjacent Local Wildlife Site. If significant sporting events are proposed these could be in the evening leading to floodlighting and may attract significant traffic given the site is not accessible by buses.

189. Should further details be provided in respect of the types of facilities to be provided?

1.31 Yes. However, it seems clear that the Council does not understand what a Sports Park is. Will there be buildings, what sports are proposed to be accommodated. Is this a stadium? Is this a proposal supported by facilities such as food outlets, retail or other infrastructure?

Orwell Country Park Extension (Policy SP8)

190. Does Policy SP8 provide a clear indication of how a decision maker should react to a development proposal for the Orwell Country Park extension on this site? Should it contain any criteria against which to assess any proposal?

1.32 The Orwell Country Park extension is already bisected by public paths. It is counterintuitive to suggest that this proposal can help to limit visitor access to the foreshore. The main reason that visitors use the locality is to gain access to the foreshore. The totality of the allocations at Ravenswood will add to visitor pressure and will impact negatively on the SPA. The Country Park extension is not mitigating this hugely damaging collection of local plan policies within walking distance of the SPA.