

**Suffolk County Council Hearing Statement****Matter 6 – Site Allocations**Authors

Cameron Clow – Senior Planning and Growth Officer  
James Cutting – Head of Planning  
Graeme Mateer – Head of Transport  
Suzanne Buck – Transport Policy and Development Manager  
Luke Barber – Principle Development Management Engineer  
Chris Fish - Senior Development Management Engineer  
Pete Mumford – Schools Planning manager  
Denis Cooper – Flood and Water Engineer  
Abby Antrobus – Senior Archaeology Officer

**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?**

**Strategic Allocations**Ipswich Garden Suburb

*79. What evidence is there to show that the infrastructure requirements listed in Table 8B for the IGS are justified, deliverable and consistent with national policy?*

Transport contributions have been considered in detail alongside the Transport Assessments that were submitted with the two outline planning applications that have since been approved. These assessments include estimates of modal shift that are then linked to travel planning measures, contributions to bus services, public rights of way and off-site sustainable transport measures.

These are consistent with the NPPF which (para. 103) seeks “opportunities to maximise sustainable transport solutions” whilst recognising that these will vary between urban and rural areas and (at para. 108) will be “appropriate opportunities [...] given the type of development”.

As noted above, the Department for Education has provided guidance to supplement the strong policy position at paragraph 94 of the NPPF that “It is important that a sufficient choice of school places is available to meet the

needs of existing and new communities”. The estimated number of pupils likely to be living within new developments such as the Ipswich Garden Suburb is based on previous experience and tested against localised data from the 2011 Census (the latest information available).

The current ‘Securing developer contributions for education’ DfE guidance (November 2019) recommends using cost data based on the DfE local authority school places scorecards to help to establish developer contributions per school place, adjusting the national average for region and inflation. Previous cost estimates that informed the 2018 decision by Ipswich Borough’s Planning and Development Committee are now out of date.

Early years and primary education can be delivered within the neighbourhoods identified through the transfer of land and financial contributions. The delivery of the secondary school has been secured through an option agreement was signed between Mersea Homes and Suffolk County Council on 30 January 2020 enabling the land can be transferred to Suffolk County Council if Mersea Homes secure planning permission for development of the remaining parts of its Redhouse site.

The County Council, as Waste Disposal Authority, has statutory responsibilities as prescribed in s51 of the Environmental Protection Act 1990. This covers the interface between collection and disposal, such as at transfer stations, which Suffolk County Council is delivering, and which should provide sufficient capacity during the plan period. The responsibilities also includes the deposit of household waste.

The NPPF requires planning policies and decisions to plan positively for the provision and use of community and other local services (para. 92) and (at para. 182) states that “Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities”. Currently, there is not sufficient capacity at the existing Household Waste Recycling Centres to meet the additional demand arising from population growth from new development. For example, the existing recycling centre at Portman’s walk will need to be relocated to a larger site.

*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?*

The development of the Supplementary Planning Document (SPD) has been an important element in the master planning of the Ipswich Garden Suburb. There are detail elements during this process that could not be undertaken during the production of the local plan. Infrastructure requirements are set out in table 8B, some of which relate to activities of local authorities, such as transport and education, others relate to regulated utilities. How the development relates in detail to the infrastructure requirements, the provision of surface water drainage and open space for example, will be part of masterplanning individual parcels of land but the SPG provides a vital coordinating linkage between the overall policy and the specific design parameters of the individual parcels. Pedestrian and cycle linkages between the parcels and beyond the site is a good example of an important policy matter which the SPD has already helped to plan.

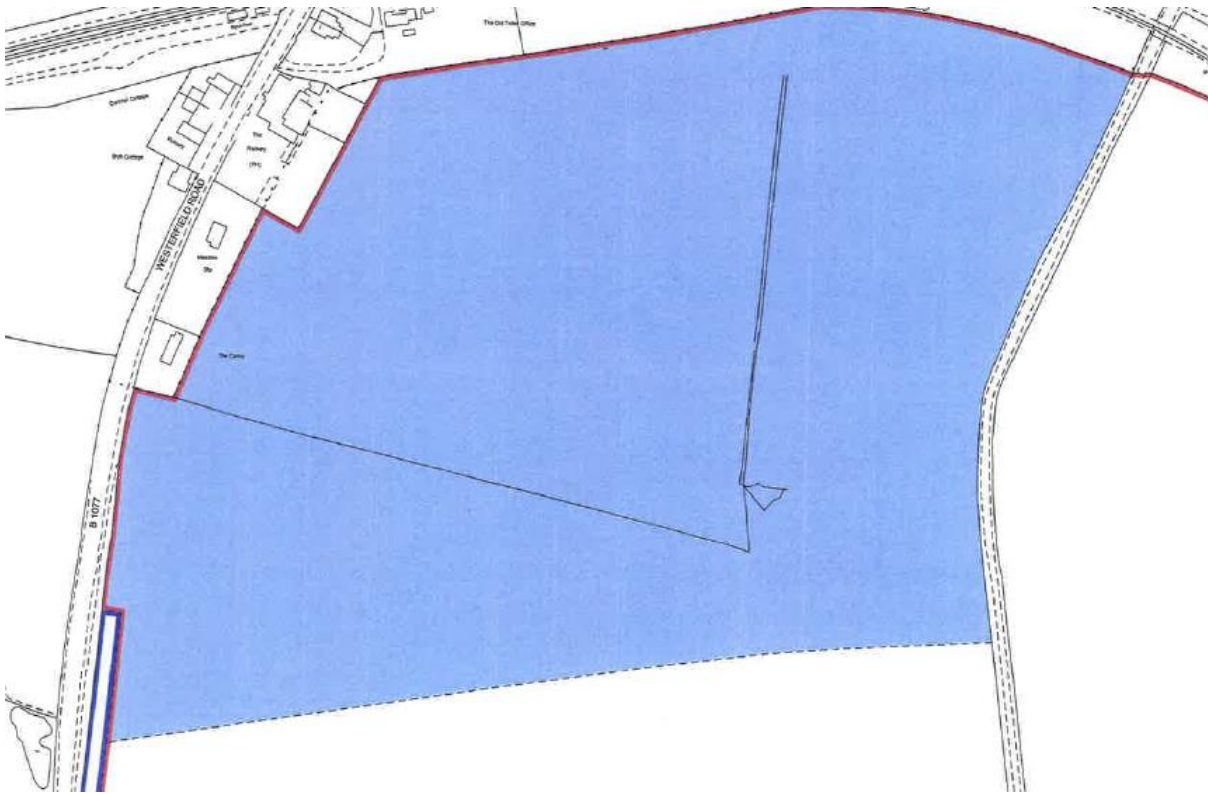
*86. Should the Secondary School Site be shown as a broad location rather than a specific allocation on the Policies Map?*

The location of the secondary school has been part of the production of policy, particularly the supplementary planning document that was approved by Ipswich Borough Council on 22 March 2017.

There should be a specific allocation because this is essential infrastructure that needs to be delivered and the requirements for site area and location of the school within the Red House Land have been established and agreed.

An option agreement was signed between Mersea Homes and Suffolk County Council on 30 January 2020 enabling land to be transferred to Suffolk County Council if Mersea Homes secure planning permission for development of the remaining parts of its Redhouse site.

There is, however, a difference between the allocation in the Local Plan and the site agreed through the option agreement. The plan below shows the extent of land included in the option agreement between Mersea Homes and Suffolk County Council.



This area is in the same broad location but differs from the current specific allocation owing to:

The incorporation of the primary school site within the Red House part of the Ipswich Garden Suburb into this area, and

Potential for access for the school(s) land from Westerfield Road to be made before completion of the primary road serving the residential areas.

Within the site, there is the potential for an all-through school or, in the case of different academies, some potential to share land uses such as vehicular circulation, parking and landscaping. Specific sharing of playing fields between schools is unlikely as timetabling and curriculum requirements are likely to require separate facilities. The site area agreed (at 10.9ha) is sufficient for both primary and secondary schools and for these to reach 1,200 places for secondary, 420 for primary and 60 for early years. These schools might not be built to this size initially, the secondary school could open as a 600 place school with "core" facilities for 900 places, or be built for 900 initially. Likewise, the primary could be 210 initially alongside a 60 place early years setting.

*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?*

The East Suffolk and Felixstowe branch lines run through the Ipswich Garden Suburb. Both are operational with differing freight and passenger uses. The potential impacts of additional rail movements would be assessed as part of the Environmental Statement submitted with the Sizewell C Development Consent Order.

*89. Has sufficient consideration been given to the impact of the IGS on air quality, flood risk, drainage, the existing road network, sewerage infrastructure and biodiversity?*

Strategic assessments have been undertaken; thorough consultancies commissioned by Ipswich Borough Council on infrastructure capacity. The outline applications for Henley Gate and Fonnereau villages included cumulative assessments of traffic impact. Furthermore, the transport modelling that has been undertaken with this Local Plan has incorporated this strategic allocation. This work has also informed air quality assessments that Ipswich Borough Council has commissioned.

With regard to drainage, SuDS to mitigate impacts are briefly described in the Garden Suburb SPD, which was, in turn informed by a Preliminary SuDS masterplan. Site specific FRAs submitted with planning applications have / are refining and further developing the SuDS strategy and designs in close liaison with the SCC floods team.

### Humber Doucy Lane

*94. Have the impacts upon local infrastructure and services been effectively considered? In particular:*

*a) Is it reasonable that the development should rely on the adjacent allocation at Ipswich Garden Suburb for the provision of its primary school places?*

In terms of the anticipated phasing of the Humber Doucy Lane and Red House Farm area of the Ipswich Garden Suburb, it is a reasonable approach. The allocation is within the catchment area for Rushmere Hall Primary School which cannot expand any further. The allocation is nearest to the Red House area of the Ipswich Garden Suburb development where a primary school will be delivered. The number of dwellings in this allocation, 496, is insufficient to generate the need for a new primary school on its own. 496 Dwellings generate an estimated

124 primary pupils, whereas a new primary school would require at least 200 pupils (usually generated by 800 dwellings) to be viable. Ipswich Garden Suburb is expected to generate the need for 875 primary places and will be providing three 315/420 place primary schools which would be equivalent to 945/1260 places. Based on the estimates above, the primary provision within Ipswich Garden Suburb should be able to accommodate the estimated 124 primary pupils generated from IPSA 4.1. The timing of IPSA 4.1 compared to Ipswich Garden Suburb will be key to this strategy being successful.

*c) Should the allocation include a local centre/retail provision, as proposed in the SoCG [A28] with Suffolk County Council?*

The provision of some local retail would help to provide accessible services within walking distance to the residents at the new allocation and existing housing nearby, minimising the need for travel. As can be seen on document A1.1 (District and Local Centres) new residents at the Humber Doucy Lane allocation would be farther than 800m away from a local or district centre. Services being farther away from the allocation means people are more likely to use their car to access services, potentially adding to traffic. Having some services nearby enables access by active travel.

*95. The supporting text at paragraph 8.28 states that the transport mitigation measures required for this development are challenging. The Council now proposes to remove the word 'challenging' from the supporting text. However, what evidence is there to support the deliverability of these transport mitigation measures?*

As with the other sites in the plan, modal shift will be required as part of the ISPA Transport Mitigation Strategy (D39) works to avoid significant impacts at local junctions. The options to achieve increases in traffic capacity are limited by space constraints therefore good quality walking, cycling and bus routes are crucial. The strategy focuses on measures of sustainable transport mitigations schemes which are very achievable and proportionate to the scale of development.

Comment on how ISPA Transport Mitigation Strategy will be delivered is provided in answer to question 21.

*99. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet agreed with Suffolk County Council in the SoCG [A28] necessary to make the Plan sound in this respect?*

Yes, archaeological impact has been fully considered. While the additional information is not strictly necessary for soundness, as mentioned in the county council's submission consultation response (representation 26616), this information provides clarity for developers and makes the site sheets consistent. The change to the wording and recommendations for evaluation will provide clarity for developers and ensure that the plan is sound in that it sets out expectations in relation to the implementation of DM14 and the NPPF regarding evaluation of sites. In this case, evaluation would identify foci of activity that may be present and inform approaches to mitigation. The inclusion of reference to archaeology also means the plan is consistent about providing archaeological advice on site sheets.

The site sheet notes that these large greenfield areas have not been subject to systematic evaluation. The sites are located on an area of higher clay plateau where, as a general rule, dispersed archaeological remains related to landscape use in all periods may be anticipated. Within the allocation area, cropmarks of field boundaries and extraction pits are recorded, as well as findspots of prehistoric and medieval finds. Farmsteads are recorded in the Historic Environment Record along Humber Doucy Lane.

*103. Has full consideration been given to the impact of the development of this site on the agricultural land, ecology, air quality, the existing road network, traffic, local services and facilities, flood risk and drainage infrastructure?*

The county council as highway authority has provided its view on this site to Ipswich Borough Council and, at this stage, consider that the site is capable of coming forward from highways perspective.

Parking would be expected to be delivered on site as per the minimum parking requirements in the Suffolk County Council Guidance for Parking 2019, unless other standards in Policy DM22 apply.

With regard to drainage, surface water flood risks on the site have been identified in the SFRA. A site specific flood risk assessment will be required to identify the appropriate drainage strategy for this site.

## **Land Allocated for Housing**

### **IP010a – Co-op Depot, Felixstowe Road**

*119. Is sufficient land set aside within the allocation for the provision of an extension to Rose Hill Primary School?*

The county council has made clear in its submission to the regulation 19 consultation (representation 26595) and the Statement of Common Ground with Ipswich Borough (I15) that 0.5ha of land noted on the site sheet is insufficient to provide the necessary expansion required for growth in the local plan. The required area is 0.8 hectares, which has been determined through a feasibility study. The study applies the space requirements set out in Building Bulletin 103.

*120. Although the Council says that the amount of land required for each use will be subject to separate landowner discussions and may be subject to change, as noted in the SoCG [A28] with Suffolk County Council, do Policies SP2 and SP7 provide a clear indication of how a decision maker should react to a development proposal on this site?*

As the policy is currently unclear on the area of land required to fulfil educational requirements, there is not a clear indication as to how a decision maker should react to this proposal. Stating the requirement (0.8 hectares) makes clear to the decision maker whether a planning application is meeting this requirement and would mean that this part of the plan is compatible with paragraph 94 of the NPPF and therefore sound.

#### IP011c – Smart Street/Foundation Street (North)

*122. Has the impact of the proposed allocation on archaeology been fully considered?*

Yes, the relevant information for developers and decision makers is included in the site sheet.

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

*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?*

Parking requirements are set out in Policy SP17. The level of parking at these sites should be determined using this policy.

#### IP037 – Island Site

*131. Would an additional access be required to enable development? If so, what is the justification for this?*

The view of the highway authority is that an additional access would be required to enable this development, unless there is evidence stating otherwise.



*134. Should reference to early years provision be included in Table 1 in Policy SP2 for this site?*

Yes, policy should contain reference to a setting for 90 places which will require 0.13ha of land in order to make the infrastructure and land requirements are clear to applicants and decision makers. expected uses on the site clear to the developer and make the policy sound

IP048a – Mint Quarter/Cox Lane East Regeneration Area

*137. Should reference to early years provision be included in Table 1 in Policy SP2 for this site, as agreed in the SoCG [A28] with Suffolk County Council?*

Yes, policy should contain reference to a setting for 60 places which will require 0.1ha of land. in order to make the infrastructure and land requirements are clear to applicants and decision makers. This will make the expected uses on the site clear to the developer and make the policy sound.

IP061 – Former School Site, Lavenham Road

*141. Has full consideration been given to the impact of the development of this site on the character and appearance of the area, green space, heritage assets, the living conditions of neighbouring residents, highway safety and car parking, local services and facilities and local wildlife?*

Heritage with regards to archaeology has been fully considered, site sheet contains information on what developer should undertake to assess archaeological heritage assets.

The county council as highway authority has provided its view on this site to Ipswich Borough Council and, at this stage, consider that the site is capable of coming forward from highways perspective.

Parking would be expected to be delivered on site as per the minimum parking requirements in the Suffolk County Council Guidance for Parking 2019, unless other standards in Policy DM22 apply.

IP089 – Waterworks Street

*142. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet, agreed with Suffolk County Council in the SoCG [A28], necessary to make the Plan sound in this respect?*

Yes, the impact has been fully considered. While the additional information is not necessary for soundness, this information provides clarity for developers.

The site is on the edge of the Anglo-Saxon and Medieval core, in a more suburban location with differing archaeological potential, and the small grammatical change was intended to reflect this to differentiate from sites within the core. The nuance does affect consideration of the impact of the proposed allocation on archaeology which underpins SCC consultation responses in relation to the site sheet. The potential of the site differs to those within the core of the town, although there is potential for encountering archaeological remains relating to activity in the suburbs, for example, industrial activity from the Middle Saxon period onwards, and the site of a Tudor gunpowder factory. The site has been previously built with terraced housing, now demolished. Early consultation will enable informed approaches to mitigation. Without prejudice to the results of evaluations, the balance of probability is that the archaeological remains will be different in character to elsewhere in the town where complex Anglo-Saxon remains may be anticipated, or deeper sequences including waterlogged remains.

#### IP098 – Transco south of Patteson Road

*143. Has full consideration been given to the impact of the development of this site on the living conditions of neighbouring residents and car?*

Parking would be expected to be delivered on site as per the minimum parking requirements in the Suffolk County Council Guidance for Parking 2019, unless other standards in Policy DM22 apply.

#### 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?*

While not strictly necessary for soundness from archaeological point of view, it would make for a more coherent approach to archaeological site investigations across the whole area.

A coordinated approach to these sites would enable a coordinated drainage strategy.

A coordinated approach to these sites would enable more integrated planning of transport.

*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?*

With regards to the highway network, in 2018 improvements were made to Nacton Road from the junction with the A14 off-slip to Thrashers roundabout, the junction with the Ravenswood development. This improvement provided increased capacity going into town by providing an additional lane, the purpose of this scheme was to reduce queuing back to the A14. The inclusion of either signals or a roundabout at the Nacton Rd/Orwell Country Park were considered and rejected as they would likely cause queueing onto the A14 which was the problem the scheme was addressing. The access therefore is limited to left in, left out. Any development will therefore need to be served from the current Ravenswood access at Thrashers roundabout.

Impacts on the highway network has been considered through the ISPA modelling. Ravenswood currently has one all vehicular access and one bus gate. The primary option to manage increased flows at the Thrashers roundabout is to signalise the roundabout and introduce additional lanes on approach to the roundabout. This proposal is included in the mitigation programme for Ipswich and has also been submitted to the DfT's Pinch Point for funding, submitted 31 January 2020.

The bus gate is key to providing sustainable access to the site and could accommodate increased bus movements in response to increased modal shift from the Ravenswood site. In addition to the Thrashers roundabout improvement referenced above, an option to provide additional access to the site would involve opening up the existing bus gate to Maryon Rd and moving it to a location adjacent to the school. Maintaining a bus gate is important to support modal shift for this large development. This option would split access in and out of the Ravenswood site but preventing movement through the point of the bus gate.

With regards to drainage, the county council has identified that SuDS will be needed for drainage, which is noted in SFRA appendix F.

#### 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?*

This is covered in the SCC response to question 146.

*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?*

Consideration has been given to the impact on the local highway network. Please see SCC's answer to question 147 for a full explanation.

IP307 – Prince of Wales Drive

*155. Has full consideration been given to the impact of the development of this site on the character and appearance of the area, green space, the living conditions of neighbouring residents, biodiversity, highway safety and car parking, local services and facilities and local wildlife?*

The county council as highway authority has provided its view on this site to Ipswich Borough Council and, at this stage, consider that the site is capable of coming forward from highways perspective.

Parking would be expected to be delivered on site as per the minimum parking requirements in the Suffolk County Council Guidance for Parking 2019, unless other standards in Policy DM22 apply.

IP354 – 72 (Old Boatyard) Cullingham Road

*156. Has full consideration been given to the impact of the development of this site on the living conditions of neighbouring residents, highway safety, traffic congestion and car parking, pollution, flood risk, play provision, drainage and sewage capacity, local services and facilities and local wildlife?*

The county council as highway authority has provided its view on this site to Ipswich Borough Council and, at this stage, consider that the site is capable of coming forward from highways perspective.

Parking would be expected to be delivered on site as per the minimum parking requirements in the Suffolk County Council Guidance for Parking 2019, unless other standards in Policy DM22 apply.

As is stated in the SFRA, the drainage strategy for the site should be considered early in the site planning process to ensure adequate inclusion of SuDS and adequate provision for the management of surface water. A site specific flood risk assessment will be required and should inform the layout of the site.

*157. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet,*

*agreed with Suffolk County Council in the SoCG [A28], necessary to make the Plan sound in this respect?*

Archaeological impact has been fully considered. While the additional information is not necessary for soundness, this information provides clarity for developers and makes the site sheets consistent.

IP355 – 77-79 Cullingham Road

*159. Has the impact of the proposed allocation on archaeology been fully considered? Is the proposed change to the archaeology wording on the Site Sheet, agreed with Suffolk County Council in the SoCG [A28], necessary to make the Plan sound in this respect?*

Yes, the archaeological impact has been fully considered. While the additional information is not necessary for soundness, this information provides clarity for developers and makes the site sheets consistent.

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?*

Consideration has been given to the impact on the local highway network. Please see SCC's answer to question 147 for a full explanation.

Site IP067a – Former British Energy Site, Cliff Quay

*255. Would the Council's proposed changes to the site sheet for IP067a, set out in the Statement of Common Ground [paragraph 10.3 of A24], provide the necessary policy safeguards to ensure an acceptable standard of residential amenity? Should they be treated as proposed Main Modifications?*

It should be noted that planning applications on this site will need to have regard to the Suffolk Minerals and Waste Local Plan which contains policy safeguards to prevent prejudice against the operation of waste facilities. The relevant policy is Policy WP18: Safeguard of Waste Management Sites.

A planning application for residential development which falls within the safeguard area for an operating waste site will need to show that the amenity effects from the existing waste site will not be significant or can be mitigated against. This is to prevent new development creating statutory nuisances which would hamper the operation of existing facilities.

**Land Allocated for Employment Uses***IP150c – Land South of Ravenswood*

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

This is covered in the SCC response to question 146.

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

This is covered in the SCC response to question 147.

**IP152 – Airport Farm Kennels, north of the A14**

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

This is covered in the SCC response to question 147. Additional information in relation to the park and ride is provided in the county council's answer to question 181.

*181. Is the reference to the Council investigating the feasibility of park and ride on part of this site in Table 3 and in Policy SP9 justified and effective, given the objections from the landowner? Is it the intention of the Council to 'safeguard' part of the allocation as a site for park and ride? If so, should this be made explicit in Policies SP5 and SP9 of the Plan? If not, do Policies SP5 and SP9 provide a clear indication of how a decision maker should react to a development proposal on this site, in particular whether provision for park and ride will be a requirement?*

While in general the county council supports the sustainable transport measures, the priority for park and ride in Ipswich is to ensure the sustainability of existing park and rides, followed by the reopening of the Bury Road park and ride in the north of the town.

A park and ride site in this area of Ipswich could perhaps be later in the local plan period at which time both capacity measures at Thrashers and some modal shift as part of the Smarter Choices will have been realised. Details of access to and from this site would need to be considered at that time.

**Allocations for Open Space and Leisure Uses or Community Facilities**  
**(Policies SP6 and SP7)**

IP150b – Land South of Ravenswood

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

It is anticipated that any vehicular access would be via the Ravenswood development. For full details see SCC's response to question 147.

*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?*

**Land safeguarded for transport infrastructure (Policy SP9)**

*191. Policy SP9 refers to the Council investigating the feasibility of park and ride on part of IP152 – Airport Farm Kennels. What evidence is there to support the need for and deliverability of additional park and ride at this site?*

Please see the county council's answer to question 181.

*192. Is it clear from Policy SP9 and Table 6 how much land is reserved for specific transport infrastructure?*

Currently it appears this table only shows the whole site area. It would be clearer if the land area for transport infrastructure was specified.

*193. Does Policy SP9 provide a clear indication of how a decision maker should react to a development proposal for transport infrastructure on the allocated sites?*

The requirement for additional vehicular access will be confirmed with final development access proposals, number and type of dwellings and confirmation of any new employment, associated development. However, additional access options for emergency, walking and cycling should be provided unless evidence is provided to demonstrate they are not needed.

*194. Are the transport infrastructure requirements at IP037 - Island Site set out in Table 6 to Policy SP9 justified and effective?*