

IPSWICH LOCAL DEVELOPMENT FRAMEWORK: SITE ALLOCATIONS AND POLICIES

Analysis of comments received in response to issues and options consultation, June-July 2006.

Overview

Number of comments received on each of the issues

Issue Number	Issue	No. of comments
1	Identifying Most Appropriate Use for Development Sites	101
2	Balance Between Housing and Employment Use	89
3	Phasing of Allocated Sites	58
4	Sites Total (see individual totals below)	886
5 (i)	Location of Greenfield Development	535
5(ii)	Scale of Greenfield Development	163
5(iii)	Timing of Greenfield Development	127
6	Accessibility of Sites	31
	<i>Comments on Additional Sites (71-107)</i>	<i>(55)</i>
	Total	2,045

Whilst this paper pulls together as far as possible the 2,045 wide ranging comments made on this topic, please note that the full database of comments is available on the Ipswich Borough Council web site at www.ipswich.gov.uk on the Strategic Planning and Regeneration page.

A detailed analysis of each issue follows.

Issue 1: The Identification of the Most Appropriate Use for Development Sites.

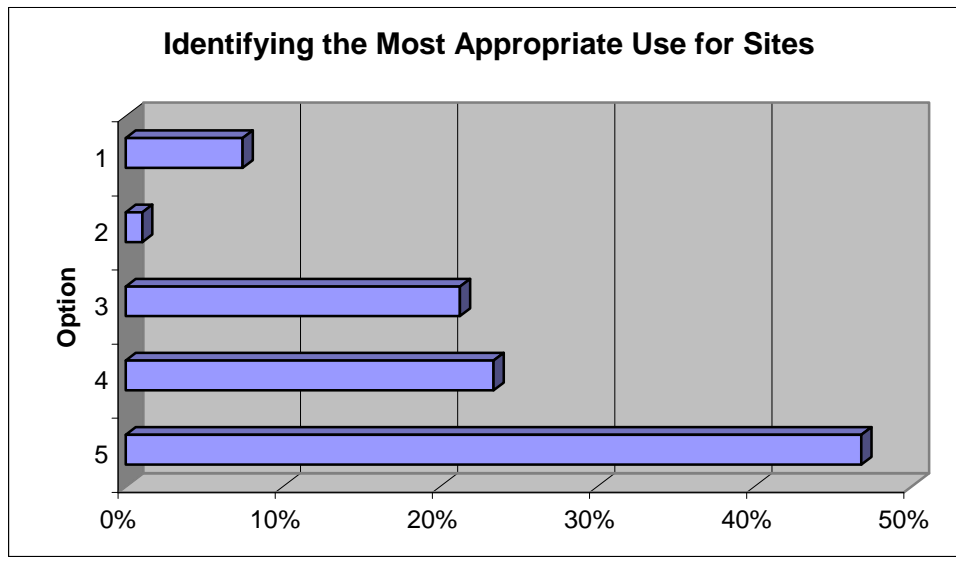
Option 1: Allocating land for housing is more important than allocating land for employment.

Option 2: Allocating land for employment is more important than allocating land for housing.

Option 3: Each site should be considered on its own merits.

Option 4: The use of a site should be determined through the application of criteria (ie. for housing, proximity to amenities, employment and public transport accessibility).

Option 5: The use of a site should be determined by a sequential approach which considers brownfield Vs greenfield, public transport accessibility etc.



There were 101 responses in total to Issue 1. Of the options offered by the Issues and Options paper, the majority of support (44 responses) was for a sequential approach as set out in Option 5 although in general, the development industry respondents seem to be looking for flexibility indicating that they prefer each site to be considered on its own merits (option 3). (in some cases reference was made to the need for a policy to be flexible enough to cope with changing needs according to changing priorities and markets).

EERA commented that Options 3,4 & 5 are broadly consistent with the policies of the East of England Plan but GO East expressed concern that the sequential approach should not be stated as an option as it should be an underpinning principle to site allocation (ie. one of “the givens”). The lack of reference to the national policy framework was also of concern, for example the options make no distinction between uses such as B1 offices and retail for which national policy guidance (PPS6) would direct towards town centres as opposed to general industrial type uses. These influences on suitable locations for development will have to be clarified in the Preferred Options stage.

In response to question 2, which asked whether there was any real benefit in clustering uses all of the respondents supported the concept of mixed-use developments in some form or another. Half of the responses also singled out industrial uses from the mix but there was no clear steer about what overall mix would be preferred.

The respondents suggested a range of possible criteria for determining the most appropriate use for a site (Option 4) as follows:

- proximity to amenities.
- the need to consider the surrounding uses
- sites relationship to existing built up area
- links to public transport

- linkages to other services
- sequential approach
- need
- preserving open space/allotments
- biodiversity assessments
- sustainable/green transport links (including pedestrian routes and cyclepaths)
- design
- accessibility
- traffic minimisation
- pollution
- proximity of leisure facilities
- good road access for HGVs for industry and retail
- Access to A14 for business
- landscape character assessments
- townscape character assessments
- the need for development to enhance an area
- mix of uses

Similarly, in terms of what a sequential approach should be for Option 5 the following considerations were put forward

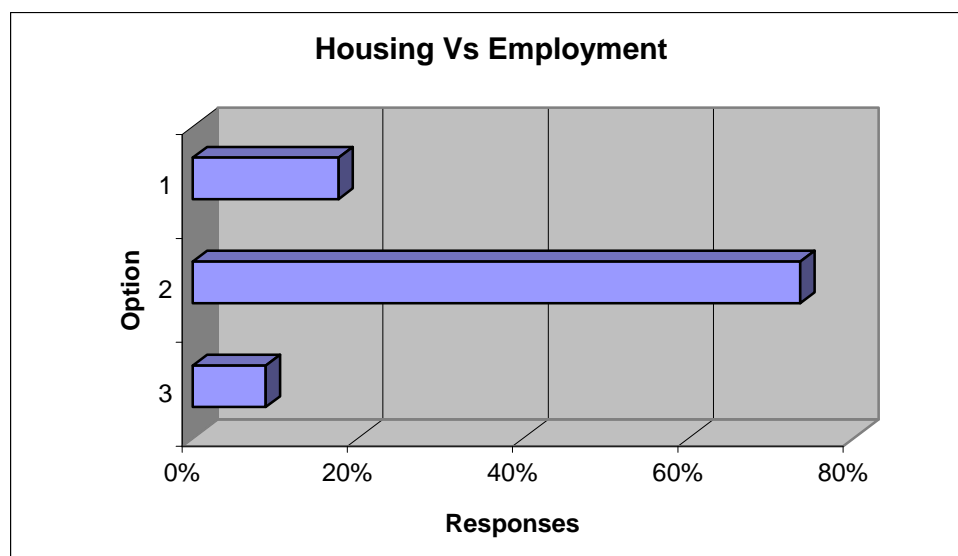
- vitality of town centre
- develop brownfield before greenfield
- local needs not government needs
- PPG3 sequential approach criteria and National Policy Framework
- a sustainability test
- non-environmentally sensitive sites first
- access
- public transport
- schools.

ISSUE 2 : The balance between housing and employment use.

Option 1: The Council should try to balance housing and employment provision in each neighbourhood.

Option 2: The Council should recognise that the balance will differ across areas and go for a Borough- wide balance.

Option 3: The Council should cluster similar uses together to achieve single-use areas.



There were 89 responses to Issue 2. Of the 68 that indicated a preferred option, an overwhelming majority (75%) preferred the Council to aim for a Borough-wide balanced approach (option 2) for housing and employment. These included Suffolk County Council, although the need to address any existing imbalances was highlighted.

The remaining 20 comments provided a range of opinions from those who are against any further housing and employment growth per se and/or development of business parks/ office blocks to respondents such as EEDA who favour high quality business premises in sustainable locations.

Those who preferred Option 1 (including Babergh District Council, University Campus Suffolk & Taylor Woodrow and Suffolk Preservation Society) usually stated that it is in their view, the most sustainable approach.

The Kesgrave Covenant Ltd responded that Ipswich should not lose any of its employment land if it is to achieve its jobs target and Crest Nicholson qualify their support for Option 2 suggesting that the balance should be sought across the Ipswich Policy Area, rather than just across the Borough.

Some respondents expressed some concern about delivery of jobs to match housing growth as policies cannot be prescriptive about jobs. Others perceived there would be difficulty in attracting new employment to the town and another flagged up the need for Ipswich to have a unique selling point to encourage inward investment.

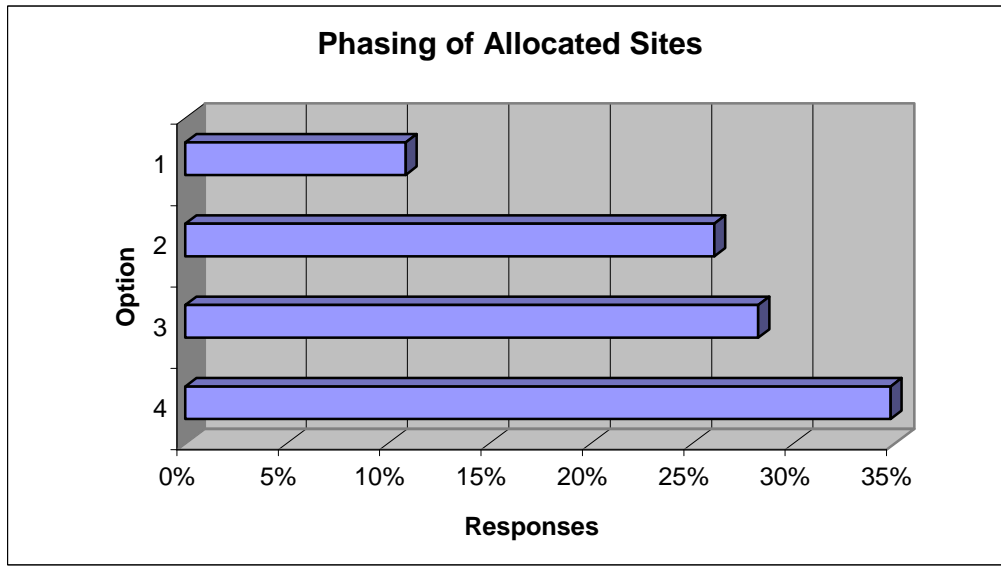
ISSUE 3: The Phasing of Allocated Sites.

Option 1: Phasing should be based on prioritising those sites with the best sustainability appraisal results.

Option 2 : Phasing should be based on prioritising sites ready for development first (ie. sites with no constraints to development).

Option 3 : Phasing should be based on prioritising problem sites first (ie. sites generating public complaints or harming the Borough’s image).

Option 4 : Phasing should prioritise sites reflecting the regeneration priorities.



There were a total of 58 responses on the phasing issue and they were fairly evenly split between Options 2, 3 and 4 although some responses indicated a combination of Options 1 & 2 or 1&4 would be preferred. Other respondents made clear that Phasing and delivery would in their view require a strategy based on each of the Options 1-4.

EERA supports the adoption of a plan, monitor and manage approach for the delivery of development sites and is concerned that the release of allocated sites should not in its view result in the overprovision and early release of greenfield land as expressed in policies SS4 & H3 of the Draft East of England Plan.

Of those that did not agree with any of the options listed most came from the development industry representatives. Comments included;

- Land release should be based on a sequential approach, preferring the use of brownfield sites first.
- Greenfield releases alongside brownfield regeneration will be necessary to deliver choice and a range of housing. They would prefer not to adopt a phased approach as in their view flexibility is the key to delivery across the plan period. There is a need to be able to respond to individual circumstances and recognition needs to be given to the timescales and investment necessary to put in place infrastructure to serve large sites.
- A strictly controlled phased approach may lead to market forces and monopolies controlling build-out rates.
- The options may be better suited to non-central sites whereas in the centre, the range of objectives being pursued might necessitate the release of several sites at the same time or as availability allows (eg.retail sites).
- There should not be restrictions on employment land coming forward given the urgent requirements for employment land. Priority should be given to areas such as the Waterfront.

Issue 4: Comments on Individual sites

Respondents were invited to comment on the 70 possible sites put forward for development. Each of these sites has a set of possible uses, about which respondents could give their views. For each site, respondents were asked to answer the following questions:

1. **Do you think this site should be allocated for development?**
2. **What is your preferred use for this site?**
3. **Why is this your preferred use for this site?**
4. **If the Council decides to promote a mix of uses on this site, what mix of uses do you believe it should promote?**
5. **What are your views on the current use of this site?**
6. **Are you aware of any difficulties relating to developing this site?**
7. **Do you have any other comments about this site?**

862 comments were received relating to the specific sites set out in the consultation paper. The comments received were helpful in indicating the extent of support for particular options on each site, and also in identifying opportunities and constraints. A number of respondents also suggested other sites that the Council should consider allocating for development.

Comments received on the 70 sites

The table provided in the appendix to this summary paper summarises the comments received. For each site, the table shows:

- The number of responses received stating that the site should not be developed, and the key reasons by respondents given for not developing the site;
- The number of responses received stating that the site should be developed, numbers of support for each use option, and the key reasons given for support of each option;
- Comments received relating to possible mixed use development of the site;
- Views on the current use of the site and possible development constraints; and
- Any other key comments received relating to the site.

In the consultation paper, 66 sites (out of the 70 sites consulted on) included a possible option of development for housing. 44 of these 66 sites received support for the housing option from at least one respondent.

58 sites included a possible option for development for employment uses. 25 of these 58 sites included support from at least one respondent.

Comments on Extra Sites (71-107)

Respondents put forward a further 37 possible sites for development. A list of these sites is also provided in the appendix to this document. Not all of those who put forward sites promoted specific uses for those sites. However, 16 additional sites are put forward for housing, 2 for employment and 3 for mixed uses.

Key Issues

Some of the key issues raised from comments received relating to individual sites are set out below.

GO-East do not make any comments relating to specific sites. More generally they consider that the consultation document lacks a clear expression of national policy, and for soundness purposes, stronger links should be established between site options within the Borough and national policy to avoid the need for extra testing of options at a later date. They comment that if an allocation diverges from national policy, the authority should demonstrate overriding local circumstances to justify it.

EERA state that, in taking sites forward, the Council should adhere to policies SS2, SS4 and HG3 of the draft Regional Spatial Strategy for the East of England. EERA do not make any site-specific comments.

The Environment Agency raise flooding concerns on a large number of sites, and oppose development of some sites for housing on these grounds. The Agency states that a risk-based approach to the sequential test should be carried out to support site allocations and ensure that the Council takes account of flooding issues when allocating sites for development and in specifying uses.

The Highways Agency states that a number of smaller sites that are close to the town centre are unlikely to have a significant impact on the strategic road network. However, the Agency specifically cautions that some sites that would have a significant impact on the road network if developed. These include King George V Playing fields, Former Tooks Bakery on Old Norwich Rd, North of Whitton Lane as well as the Cranes Site, Raeburn Rd South/Sandy Hill Lane and the Co-op Depot on Felixstowe Rd and Bramford Rd.

Suffolk County Council state that the forthcoming Waste Development Framework will identify suitable sites for waste management.

A number of objections are received opposing the loss of open space/ recreational space to development. Sport England comment that consideration should be given to community needs for open space/facilities, particularly in relation to sport and recreation. They comment that, for a number of sites, a needs assessment (under PPG17) must be carried out to assess the justifiability of losing any open/ recreational space, or that replacement facilities would need to be provided if any such land is lost without such a justification.

Also of note is a 77-household petition from local residents objecting to development of sites S006 (the all weather area on Halifax Road) and S031 (Halifax Road Sports Ground).

The Suffolk Wildlife Trust also makes comments on the biodiversity value of a number of sites.

Suffolk East Primary Care Trusts comment that the relationship between planning and the health services is an important one given the impact of new development on these services. They request that, in particular relation to publicly owned land, the Council ensure an option for the health service provision.

Representatives of Gypsy and Traveller groups underline the need to provide for the needs of Gypsies and Travellers, and travelling showpeople, taking into account the latest government guidance and the local Gypsy and Traveller Accommodation Needs Assessment. One group asks that consideration be given to the relocation of the West Meadows site, and to the provision of transit/ tolerated stopping points for gypsies and travellers.

Two developers promoting development on the Northern Fringe oppose many possible housing allocations within the urban area of Ipswich. The key issues that they raise in relation to these sites are:

- Deliverability issues, often in relation to multiple ownership on individual sites and other constraints. These developers state that the soundness of the document may be in question if it allocates sites that cannot be delivered; and
- The need to ensure that sufficient employment allocations are made, and in that context the need to avoid the loss of existing employment land.

Other general comments of note from individuals not included in the appendix include:

- There are too many car parks in Ipswich: consider more use of multi-story car parks and park and ride facilities;
- Incorporate a green corridor linking town and country along Fonnereau Way into future policy;
- Development around Cliff Quay Water Abatement Plant should be stopped until the plant stops polluting the air: the current Odour Abatement Scheme is not working.

- Explore opportunities for conversion of existing buildings in the town centre, which are currently underused (eg. office/cinema to residential).

Major Greenfield Development Sites

ISSUE 5 (i): Where should any major greenfield development go?

Site Option A: North of Defoe Road and west of Henley Road

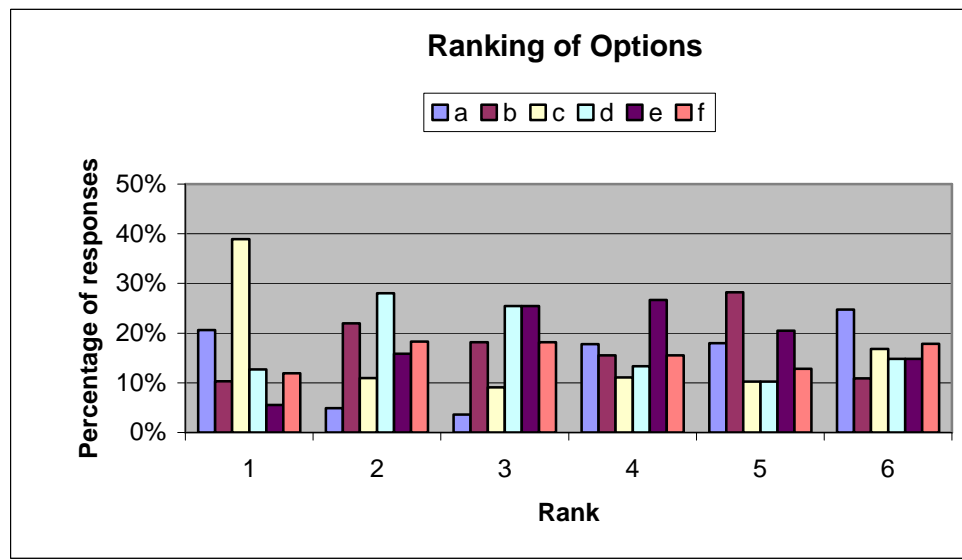
Site Option B: North of the railway line between Henley Road and Westerfield Road

Site Option C: South of the railway line between Henley Road and Westerfield Road.

Site Option D: Between Westerfield Road and Tuddenham Road and south west of the Felixstowe branch railway line.

Site Option E: Between Westerfield Road and Tuddenham and between the two railway lines.

Site Option F: North East of Humber Doucy Lane.



There were 535 replies to this Issue. Respondents were asked to rank the potential areas suitable for development. Only about half of the respondents did so because the strongest level of response overall was to oppose any development at the northern fringe irrespective of location. Suggestions were made for alternative brownfield locations within the Borough boundary at Chantry Vale/IP8 or other locations beyond the Borough boundary such as the British Sugar Factory site.

However there was some qualified support from the general public provided the range of concerns listed below were addressed.

The result of the ranking exercise is shown above.

It needs to be stressed that these results are definitely “non-scientific” (many respondents chose to only rank 1 or 2 of the options). However some tentative conclusions can be picked out. Looking at the results Option C was preferred over and above all other options, Option D was ranked 2nd most often, Options D & E were equally ranked 3rd, Option E again scored highest for 4th place, Option B for 5th position and Option A was most frequently ranked 6th. Option F figured equally strongly in the responses as the other options but generated the

least strong response in terms of where it should be ranked. However in general terms the results are scattered very widely and it is perhaps more interesting to note that Option C generated the most responses (89 in total) with over half (55%) putting it as the number 1 option. Option E received the least response (54 in total).

Very commonly, the respondents indicated that some or all of the options shown would in their view be totally unsuitable for development.

Reasons for objecting included:

1. Traffic & pollution impact – on villages and heavily trafficked areas.
2. Would exacerbate existing congestion, particularly at key junctions in peak hours.
3. Loss of attractive landscape, wildlife, trees, hedgerows, local recreational amenity.
4. Loss of agricultural land.
5. Lack of efficient public transport.
6. Pressure on schools and healthcare facilities.
7. Harm to quality of life.
8. Urban sprawl – keep villages separate.
9. Stay within the railway line and keep Westerfield and Henley separate.
10. Poor access to trunk road network & need for a northern bypass.
11. Sewerage, drainage & water supply inadequate.
12. Flooding already occurs and will increase.
13. Quantity and type of housing– development should be distributed more widely on smaller sites.
14. Brownfield sites could accommodate the necessary growth.
15. Development could take place to the south of Ipswich where there is good access to the A12.
16. The boundaries of the Borough should be reassessed.

Suffolk County Council declined to rank the areas but:

- Acknowledge the Structure Plan/Local Plan background which suggests further investigation of areas B, C & D for a potential future development of 1,500 houses:
- Recommend that a comprehensive re-appraisal of all the development options and their transport impacts needs be undertaken as a part of the LDF process:
- Advise that both Northgate and Thurleston High School are either approaching or exceeding their capacities with little opportunity to expand and offers suggestions for improving the cycle network within any new development linked to the rest of the town.

The Highways Agency comments that whilst all the options are remote from the trunk road, any consideration of highway access to them could have implications for the trunk road. If a northern bypass were to be proposed, then consideration would need to be given reducing the opportunity for local orbital trips from these new sites. One way could be to provide any connection to the A14 with only east facing slips. This would remove local Felixstowe- Ipswich movements off the A14 without encouraging other movements.

Network Rail has no objection to sites B,C,D and E which adjoin Network Rail land, station and the junction at Westerfield. But they have a number of requirements relating to development adjacent to the lines; landscaping; fencing; open space and the use of planning obligations to fund transport related mitigation or enhancements.

In relation to those with a development interest in the sites identified, Crest Nicholson supports the development of B & C in line with the 2001 Structure Plan (1,500 homes), but sees capacity for 2,500 – 3,000 homes in line with higher densities encouraged by PPG3. They point to their marketing proposal for “Henley Gate” which includes a section setting out a commitment to creating special places; the role of Ipswich at the heart of the region; sustainable construction; a masterplan, setting out plans for a mixture of uses aspects of design, movement, sustainable transport and involving the community in the creation of the development.

Similarly The Kesgrave Covenant Ltd promotes Site C as in their view it is best for road access and access to the town centre, relationship to existing housing, provision for facilities needed locally and capacity for dwellings. Best location for a mixed use development, serviceable by existing road system with a few minor adjustments, could have strong public transport links by bus to town centre and also Westerfield Station. A development of the area could retain hedgerows and incorporate a range of housing.

Ipswich School supports the development of areas C & E and confirm that a development of area C (The school playing fields) would help to deliver significantly improved facilities within area E, for use by other schools and sports groups.

Merchant Projects propose an alternative area of greenfield land between the A14 and Old Norwich Rd. (See responses to sites Issue 4 Q10)

ISSUE 5(ii) : How large should any major greenfield development be?

Option 1: The Council should plan for as little greenfield development as possible

Option 2: The Council should plan for a development that can provide a wide range of facilities for both the new housing and established neighbouring communities.

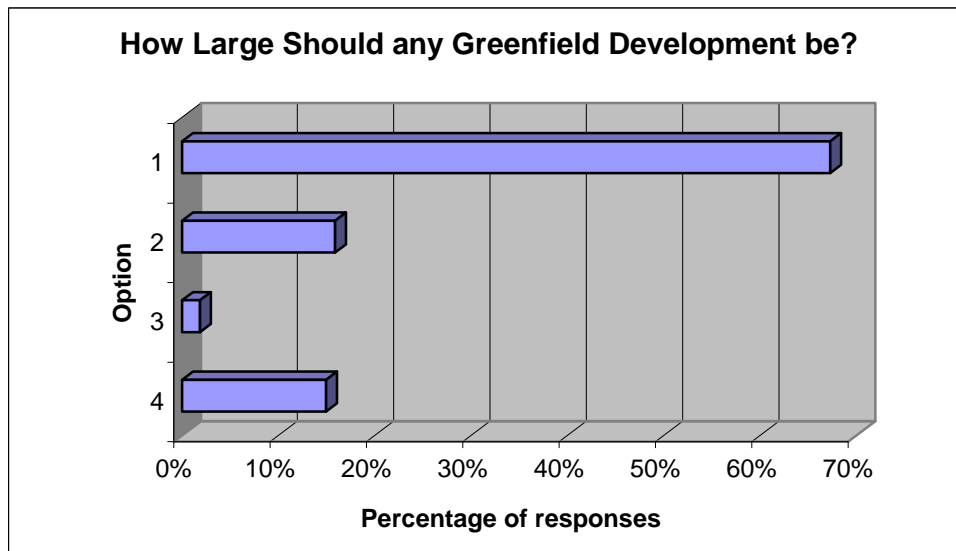
Option 3: The Council should plan for a development that goes beyond the current housing targets for Ipswich (up to 2021).

Option 4: The Council should plan for a greenfield development of :

- (i) 500 homes**
- (ii) 1000 homes**
- (iii) 1500 homes**
- (iv) 2000 homes**
- (v) 3000 homes**
- (vi) as many as will fit on greenfield land available.**

There were 163 responses to Issue 5 (ii). The majority were in response to Q16, which asked for any other factors the Council should consider when deciding how large a greenfield development should be.

Responses to Options 1-4 were as follows:



The overwhelming majority of respondents preferred Option 1 (as little greenfield development as possible). For many respondents their response to Option 1 here (plan for as little greenfield development as possible) became merged with those to Option 1 of Issue 5(iii) (The Council should plan for all greenfield development to take place after all brownfield sites have been built on) so there is a considerable overlap reflecting the general trend of opposition to development of the northern fringe. Also, many of the respondents who commented on Issue 5(i) above also made clear that they were opposed to greenfield development in principle and hence there were a large number of responses that would relate to Issue 5 (ii) Option 1 but may not have been specifically logged as responses to it.

There were 16 responses to Option 4 but many did not indicate which of the options i) – vi) were preferred. Instead, the responses provided a variety of general comments, which included maximising the use of the land (Option (vi)) and providing a development, which is of sufficient size to include new services and facilities, including schools to alleviate the pressure on existing facilities in the area.

Suffolk County Council confirms that any growth from 500-3,000 homes would have a significant impact on schools. All 6 areas fall within the catchments of Thurleston and Northgate schools; both are reaching the limit of their expansion. Should the number of new homes reach the upper end of 3,000 then a new location for a secondary school would be sought and at least 1 primary school in the area.

Following on from this, Question 16 asked whether there are any other factors the Council should consider when deciding how large any greenfield development should be. Comments ranged from those who took another opportunity to ask for the views of those people who are opposed to the development of greenfield sites to be taken into account (for all the reasons already stated above) to those that were keen to ensure that any development could be either sufficiently large to provide additional facilities or sufficiently small not to put too much pressure on existing facilities and infrastructure, particularly the local road network.

Local facilities requested included public transport, GP surgeries, dentists, schools, churches, leisure facilities, post offices, shops, convenience stores, mobile libraries, mobile police station, launderettes, community centres offering IT facilities, Age Concern tea rooms. It was also suggested that development should also reflect population demographics and provide for the needs of the elderly.

Boyer Planning on behalf of Persimmon Homes and Babergh District Council both point to the need for the scale of the development to be based on urban capacity, “critical mass” and the need to develop sites sustainably.

GO-East also stated that they would have anticipated a different approach at this stage, making a stronger link between the evidence base (urban capacity study) and options for greenfield land release. In Issue 2 the need for a balance between employment and housing is considered but no mention is made in section 5 of the use of greenfield land for employment development. Go-East acknowledge that considering different land uses could impact on the overall scale of greenfield land release needed, but if this were the case it should have been made clear and a clearer indication of the likely levels of release be provided. At preferred options stage, IBC need to give a clear indication of what land uses may need to be accommodated on greenfield land.

EERA support the factors outlined but expect the provision of greenfield land to be consistent with Policy SS3 and H3 of the Draft East of England Plan.

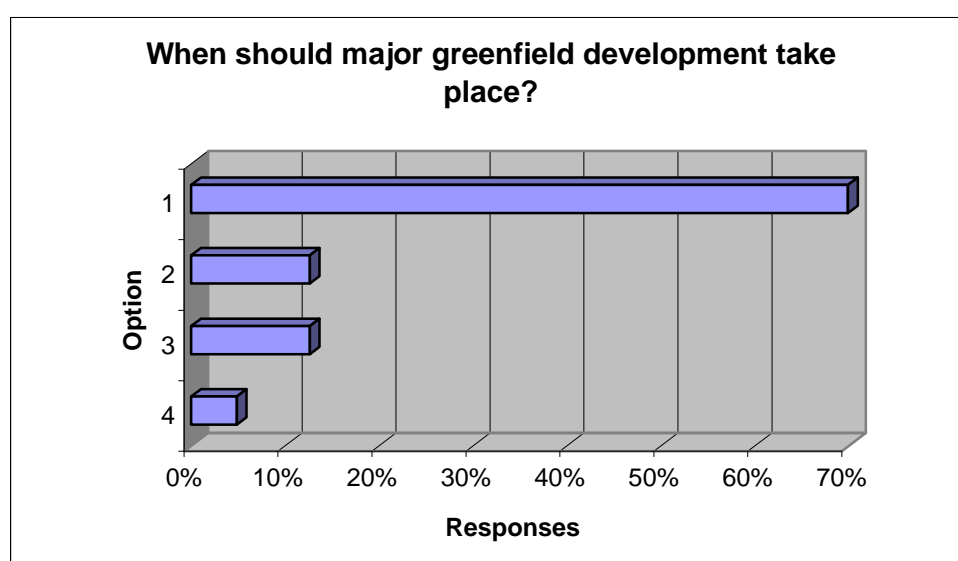
Issue 5(iii) When would it be appropriate for major greenfield development to take place?

Option 1: The Council should plan for all greenfield development to take place after all brownfield sites have been built on.

Option 2: The Council should plan to release greenfield land for development on a phased per annum basis in line with an overall percentage target for greenfield development as a proportion of total development.

Option 3: The Council should only release greenfield sites for development after all Brownfield sites are developed (ie. Option 1) or when housing completions fall more than 20% below the cumulative per annum target.

Option 4: The Council should not set any limitations on when greenfield development could take place.



There were 127 responses to this Issue in total and once again there was some considerable overlap with Issue 5(i) & 5(ii) in relation to those opposing development of greenfield land on the northern fringe of the town. Option 1 perhaps not surprisingly provided the biggest response and respondents took the opportunity to reiterate their concerns about development in the northern fringe in response to Questions 18 & 19 which asked what other factors/issues should the Council take into account when considering greenfield and/or developments to the north of Ipswich. Several people mentioned the need for a northern bypass of the town. Development Industry representatives in favour of Option 1 included British Energy and LIDL.

Options 2 & 3 attracted about 13 responses each. Those who stated a particular interest in providing consumer choice of a range of house types tended to choose option 2. They included a number of developers.

Mr. C.Mole MP and others indicated Option 3 so that greenfield land would only become available after given thresholds have been met. This option was also supported by Ipswich School, who seek a longer-term vision for the development of the area.

Crest Nicholson and some other development industry representatives generally preferred the unrestricted approach set out in Option 4, believing that flexibility will be needed to deliver the amount of housing. One respondent to option 4 warns that CPO powers will be needed if phasing is to be rigorously pursued.

The Kesgrave Covenant do not support any of the options, seeing parallel release of greenfield and brownfield land as the best solution as they play different but integral roles in the future growth of Ipswich.

Suffolk County Council did not indicate support for any of the Options, but suggested that if a greenfield development is to be pursued it should be promoted as a strategically important project contributing to overall needs while seeking to provide a range of house types within the overall housing supply. The response suggests the long lead time for such a project and the need for a degree of certainty on the part of developers could in the County Councils view, justify such a scheme running parallel with brownfield development elsewhere in the town. It would however require studies of transport impacts, high quality agricultural land, landscape, ecological, archaeological and biodiversity issues, foul and surface water drainage and the protection of the separate identity of Westerfield village.

English Nature perhaps surprisingly list Options 1 & 3 as the least preferred due to the potential biodiversity value of some brownfield sites. They recommend evaluation of greenfield sites on a site -by- site basis which considers the potential impacts on statutory and non-statutory sites, protected species and Local Biodiversity Action Plan species and habitats.

EDF Energy suggest a number of general points relating to electricity supply seeking early contact by developers to ensure these needs are factored in They include the replacement of mains, installation of new substations etc to larger sites (over 20 dwellings), waterfront sites and greenfield releases.

The MOD propose that the LDF should have regard to the 8 mile consultation zone relating to bird strike risk, part of which is within the Borough boundary and any potential locations for wind turbines which can interfere with MOD facilities (particularly radar).

Issue 6 Accessibility of Sites

Consultation question 20 asks how accessibility planning can be best used to identify development opportunities and options within the LDF?

There were a total of 31 responses to this issue.

Many of the respondents were keen to ensure that access to facilities should be at the heart of accessibility planning, particularly via non-car forms of transport. Access to the town centre using more environmentally sustainable modes was also a popular theme. Access to good road links was also highlighted (particularly to the south of the town).

One individual makes the point that transport links need to be based on feasibility studies indicating what people want and be affordable for all.

Crest Nicholson support the use of an accessibility framework to help in comparing sites and suggest the use of ACCESSION a tool for use in accessibility planning.

Bidwells suggest that the LDF needs to identify how public transport can provide access to necessary facilities/services where they cannot be provided in particular areas. They also suggest that accessibility planning should be used as a layer of information to help inform the allocation of sites but should not be an overriding issue to determine which sites are allocated.

British Energy Plc are concerned that accessibility planning should not delay appropriate development of sites that are sustainable in their own right.

ABP point to the important role that the waterfront facilities will have for residents of Bridge Ward and the Town Centre in improving accessibility to facilities (eg. doctors and dentists).

