
WRITTEN STATEMENT

IPSWICH BOROUGH COUNCIL CORE STRATEGY AND POLICIES DPD REVIEW

EXAMINATION HEARING SESSIONS JULY 2016

MATTER 5 – IPSWICH GARDEN SUBURB

PREPARED ON BEHALF OF
CREST NICHOLSON

June 2016

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1.0 INTRODUCTION

i) Overview

- 1.1 This Written Statement has been prepared on behalf of Crest Nicholson in respect of Matter 5 of the Inspector's Stage 2 Matters and Questions for the Core Strategy and Policies DPD Review (CSP DPD Review).
- 1.2 Matter 5 relates the soundness of the policies and proposals for Ipswich Garden Suburb (IGS), which is allocated under Policy CS10 of CSP DPD for mixed-use development. An IGS Supplementary Planning Document (SPD) has also been prepared by Ipswich Borough Council (IBC), and interim 'adoption' took place in September 2014. Full adoption of the SPD will not take place until the revised CSP DPD Review has been adopted.
- 1.3 Crest Nicholson has control of the northern parcel of IGS, known as 'Henley Gate' (the Site), and an Outline planning application was submitted to IBC on 22 June 2016 for the following:
- "Mixed use development comprising up to 1,100 residential dwellings (C3); a local centre inc. up to 250sqm (net) of convenience floor space (A1), up to 300sqm of comparison floorspace (A1), up to 250sqm in use classes A1-A5; and up to 500sqm community centre (D1); provision of land for a primary school (D1); provision of sports facilities, Country Park (inc. visitor centre- D1); and open space (inc. amenity space/children's play areas and allotments), sustainable urban drainage systems; and associated landscaping, infrastructure and engineering/earthworks; and the creation of 2No. new vehicular accesses from Henley Road, 1No. vehicular access from Westerfield Road (to serve Country Park only), pedestrian/cycle bridge over railway (access only), vehicular bridge over railway (access only)".**
- 1.4 A Site Boundary Plan (**Ref. AA203-2001 Rev D**) is enclosed at **Appendix A**.
- 1.5 The remaining phases of IGS are referred to as 'Fonnereau' and 'Red House' within the IGS SPD (2014). 'Fonnereau' is owned by CBRE, excluding land owned by Ipswich School, however Mersea Homes has a Promotional Agreement in place. Mersea Homes also control 'Red House'.
- 1.6 CBRE/Mersea Homes submitted a planning application for 'Fonnereau' in July 2014 (Ref. 14/00638/OUTFUL). That site totals 43ha and is located directly south of the railway line. The application seeks Outline planning permission for 815 dwellings, a district centre, a primary school, vehicular accesses, amenity space and infrastructure. The application is currently under consideration by IBC.
- 1.7 Red House is the only parcel not currently subject to a planning application.

ii) Hearing Statement Content

1.8 The following sections of this Hearing Statement respond to the following question raised by the Inspector:

Para 5.1 – Having particular regard to the following are the policies and proposals for Ipswich Garden Suburb soundly-based?

- ***Traffic and Transport***
- ***Other Infrastructure and Services***
- ***Air Quality***
- ***Fresh and Waste Water and Flooding***
- ***Landscape and Nature Conservation***
- ***Realistic Delivery During the Plan Period***
- ***The Flexibility of the Policy Requirements***

1.9 This Hearing Statement has been prepared with due regard to the tests of 'soundness', as set out in Paragraph 182 of the National Planning Policy Framework (NPPF), namely:

- **Positively prepared** – plans should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – plans should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – plans should be deliverable over their period and be based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – plans should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.10 It is demonstrated that the policies and proposals for IGS are generally soundly based. However, we do propose some amendments to the wording of Policy CS10, in order to provide suitable flexibility for future planning applications, and ultimately enable the delivery of IGS.

2.0 TECHNICAL MATTERS

- 2.1 The CSP DPD Review is supported by a number of Evidence Base documents which have been prepared by (or on behalf of) IBC, to support the allocation of the IGS.
- 2.2 The CSP DPD Review is further supported by site specific technical work which has been submitted in support of the Outline planning application for Henley Gate. This includes an Environmental Statement (ES), along with a number of other supporting documents, which demonstrate that the development of Henley Gate, either alone or in combination with cumulative schemes (including the wider IGS), does not give rise to residual adverse environmental impacts of a sufficient scale to indicate that development should be constrained. Such an assessment has also been undertaken in support of CBRE's application for 'Fonnereau' (Ref. 14/00638/OUTFUL)
- 2.3 A response to each of the technical points set out at Para 5.1 of the Inspectors Questions is provided below. Please note that, where relevant, this includes an overview of the assessments undertaken for the Henley Gate planning application. It does not however repeat the Evidence Base work undertaken by, or on behalf of, IBC.
- 2.4 Collectively, these confirm that in line with the Inspector's Question, there are no technical reasons why the IGS should not continue to be allocated for mixed use development under Policy CS10.

i) Traffic and Transport

- 2.5 The Transport Assessment (Vectos, June 2016), which forms part of the ES for Henley Gate, concludes that the highway impacts of traffic associated with the proposed development, and wider IGS, can be accommodated on the surrounding highway network, subject to a suitable package of highway improvements. It is acknowledged that traffic would inevitably be increased by the development, however it would not have a 'severe' residual impact on the local transport network, a key test of the NPPF (Para 32). The proposed offsite highway improvements and Travel Plans associated with the scheme (and wider IGS) would bring benefits for all road users by the overall improvements in pedestrian and cycle crossing facilities in the area.
- 2.6 The ES concludes that the residual impacts of Henley Gate, and the IGS as a whole, would be "minor adverse" in relation to driver delay and accidents and safety, "negligible" in relation to severance and pedestrian delay and "minor beneficial" in relation to pedestrian amenity.

ii) Other Infrastructure and Services

2.7 The Utilities Statement (TDS, June 2016) submitted in support of the planning application for Henley Gate confirms that all required services can be provided for the following:

- Anglian Water (excluding foul);
- Gas;
- Electric
- BT superfast Broadband;
- Duct Crossing for Utilities;
- Fire Hydrants.

2.8 It is assumed, albeit not confirmed by Crest Nicholson, that the same services could be provided to the wider IGS.

2.9 The provision of Infrastructure to serve IGS is considered further in Section 3 of this Statement.

iii) Air Quality

2.10 The Chapter 13 of the ES submitted in support of the planning application for Henley Gate confirms:

- No significant construction or operational traffic air pollution impacts are anticipated as a result of the Development;
- Construction effects of the proposed development (dust, traffic etc.) will be minimised through the use of appropriate mitigation measures for the Site. The mitigation measures are recommended for inclusion within a Construction Environmental Management Plan (CEMP) which will be secured through a suitable planning condition;
- For the operational phase, the main effects will be associated with development traffic. In overall terms, the operational effects of the Development are not considered to be significant. Notably, given that the predicted concentrations of NO₂, PM₁₀ and PM_{2.5} at the proposed receptor locations within the Site are well below the relevant air quality objectives, the Site is considered suitable for residential development without the need for additional mitigation.

2.11 The ES indicates that potential cumulative construction effects could occur in the event that construction of the committed developments, including the remainder of IGS occur at the same time. However, the ES concludes that significant cumulative impacts are unlikely to

occur given the locations of the schemes relative to each other; this would require the wind to be blowing in opposite directions on each development site. In addition, each development is anticipated to deploy similar dust mitigation techniques such that the individual construction phase effect was not significant, of itself or in combination with the other scheme.

- 2.12 In terms of the operational phase, the overall effects of the development and committed developments are considered to be “not significant” given that there are no predicted exceedances of any of the air quality objectives.

iv) Fresh and Waste Water and Flooding

- 2.13 A Flood Risk Assessment (FRA) (PBA, June 2016) was submitted as part of the application for Henley Gate and confirms that the majority of the Site is located within Flood Zone 1, with a small area adjacent to the Westerfield Brook at the north of the Site located in Flood Zones 2 and 3. Flooding in this area is confined to the watercourse corridor. As a result, the majority of the Site is at very low risk of flooding from surface water.
- 2.14 The proposed surface water strategy is to continue to discharge into Westerfield Brook. Surface water attenuation will be provided to accommodate the 1 in 100 year rainfall event plus an allowance for 40% climate change increase in flows in accordance with Environment Agency supporting Guidance to the NPPF ‘Flood Risk Assessment: Climate Change Allowances (February 2016)’. This will ensure that the proposed development does not have a detrimental impact on flood risk at the Site or downstream of the Site.
- 2.15 A series of SuDS features will be provided within the Development either close to the ‘source’ or in strategic features located in public open space and in the Country Park. No further measures are required for the development to comply with NPPF; however options to provide additional measures to manage the flows in the Westerfield Brook (Flood Zones 2 and 3) have been considered in the strategy for the Country Park.
- 2.16 A pre-planning report from Anglian Water (AW) (May 2016) confirms that further hydraulic modelling work is needed to assess the impact of the proposed development (and wider IGS) and to provide a solution for the drainage of foul flows from the proposed development. This modelling work is currently being undertaken by AW to assess the potential cumulative effects in relation to water resources and the foul drainage network for the entire allocation. These studies are ongoing and will identify any necessary off site measures required to mitigate any adverse cumulative impacts.

- 2.17 If this modelling work confirms the development will have a detrimental effect on the existing sewerage network, the drainage strategy will be detailed within a pre-planning addendum report from Anglian Water. This will encompass a connection point, details of any local reinforcements required and indicative budget costs. Suitable mitigation would therefore be put in place.
- 2.18 The ES has considered the potential impacts of the whole of IGS as well as other committed developments and concludes that the development at Henley Gate in conjunction with the committed development schemes will not give rise to any “significant cumulative effects” on water and flood risk.

v) Landscape and Nature Conservation

- 2.19 The Landscape and Visual Impact Assessment, included within the ES for Henley Gate, concludes that the proposed development at Henley Gate could be accommodated without causing any substantial landscape impact beyond the Site boundaries. Notably, due to the Site’s proximity to the built up area of Ipswich to the west and the presence of the railway line on the southern boundary, the Site is considered to have an urban-edge character with minimal sense of place or tranquillity.
- 2.20 The following specific mitigation measures are proposed as part of the development of Henley Gate:
- Buffer planting to the northern and eastern edges of the Country Park, to soften views from properties on Lower Road and Mill Farm;
 - Buffer planting within the open space on the western boundary to soften views from properties Sparrowe’s Nest and Sparrowe’s Nest Farm;
 - Enhanced planting to Henley Road frontage;
 - Tree planting within the Country Park; and
 - Planting along the railway line.
- 2.21 The ES indicates that views towards Henley Gate from some visual receptors will change on the completion of the whole IGS allocation and existing views over agricultural land will change to views of development, despite the landscape buffers which are proposed along the railway line and the areas of open green space within the scheme. On completion, the scheme at Old Station Works will also feature in some views from identified receptors.

2.22 The ES concludes that on completion of the development at Henley Gate, the significance of both direct and indirect effects on landscape character and on Site features would be “neutral” or “minor adverse”. In addition, whilst a development of the size and scale which is proposed will inevitably be visible from the surrounding area, the potential effects on visual amenity are limited.

3.0 INFRASTRUCTURE, DELIVERY AND FLEXIBILITY

3.1 As set out above, it is considered that the policies and proposals for IGS are generally soundly based. However, some amendments to the wording of Policy CS10 are required, in order to provide suitable flexibility for the delivery of the IGS and its future planning applications.

i) Current Infrastructure Requirements/Flexibility

3.2 IBC commissioned professional consultants to prepare an Infrastructure Development Plan (IDP) for IGS as a whole and a Steering Group (including representatives from IBC and developers/consultants with interests in IGS) was established in order to assist in the preparation of the IDP.

3.3 IBC previously envisaged that the IDP would be agreed prior to the determination of any application for development at IGS. However, it is now recognised by all parties involved that there is a risk that overall agreement on the strategic IDP will not be reached by the time the various planning applications are due to be determined by IBC. Therefore an alternative strategy will almost certainly be required.

3.4 In addition, it has generally been agreed from previous discussions with the Steering Group that infrastructure can be divided into 'neighbourhood' and 'strategic' infrastructure which are defined as follows:

- **Neighbourhood Infrastructure** – where infrastructure is to be provided in a single neighbourhood and is not relied upon as essential mitigation by any of the other neighbourhood;
- **Strategic Infrastructure** – infrastructure necessary to meet an allocation-wide need which will accordingly require site wide triggers and a site wide approach to delivery.

3.5 A draft Statement of Common Ground (SoCG) is under discussion between the relevant parties but has not yet been agreed at the time of writing, it may however, be agreed by the start of the Hearing Sessions for Matter 5 (18 July 2016). The draft SoCG sets out proposed amendments to Table 8B of the CS DPD Review and seeks to outline responsibilities for securing new infrastructure for IGS. It currently seeks to allocate the delivery of strategic infrastructure to individual phases/parcels within IGS.

- 3.6 From a Crest Nicholson perspective further discussions regarding the mechanism for securing the delivery of infrastructure need to be undertaken. In particular, Crest is of the view that allowance needs to be built into any agreement to ensure some form of “equalisation” provisions between the parties so that no party is left responsible for the delivery of a disproportionate level of strategic infrastructure.
- 3.7 With regard to Table 8B, it should be noted that the infrastructure items set out in the table are sensible however, the identified threshold and trigger points cannot be and are not supported. No evidence has been provided by IBC as part of the process to justify these trigger points and they do not reflect the actual timings necessary for the infrastructure to be put in place. It is considered that reference to specific dwelling number triggers is removed and a separate mechanism for delivery is agreed through S106/conditions. Alternatively, dwelling number triggers on an IGS wide basis (as opposed to neighbourhood specific) should be used.

ii) Delivery

- 3.8 Subject to flexibility being provided within Policy CS10 it is not considered that there will be issues with the deliverability of IGS in the short term.
- 3.9 A Planning Application for Henley Gate was submitted on 22 June 2016 and includes details of indicative construction phasing. The construction of Henley Gate is anticipated to commence in 2017, subject to gaining planning permission, and span approximately 13 years. The construction of the Development is likely to take place in six phases, with construction of approximately 150-300 dwellings in each phase. Overall, the construction process is expected to be completed by 2030. The table below shows an indicative construction programme.

Phase	Anticipated Construction Start Year	Anticipated Completion Year
Phase 1	2017	2019
Phase 2	2019	2021
Phase 3	2021	2023
Phase 4	2023	2025
Phase 5	2026	2028
Phase 6	2028	2030

- 3.10 Given the discussions at the Stage 1 Hearing Sessions regarding the limited availability of housing land to meet Objectively Assessed Needs, it is not considered appropriate for Policy CS10 to restrict the delivery of development at IGS on a phased basis.