

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**



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20 – In Alphabetical Order

**Full Redacted Representations**

**A**



**Felicia Blake**

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**From:** Helen Abbott  
**Sent:** 10 February 2020 19:13  
**To:** PlanningPolicy  
**Subject:** Ravenswood allocation

To whom it may concern

I would like to lodge my objection to the proposed 126 homes off Alnesbourn Crescent on Ravenswood, Ipswich since change of use was granted to the land from commercial to residential use. I am a local resident and feel that there would be a significant detrimental impact to the local transport network which is already an issue on the estate. With only one entrance/exit there are already problems with access, particularly during the morning and evening rush hour which is not helped by the passing traffic blocking the main roundabout on Nacton Road, and also the additional traffic at McDonald's on the Ravenswood roundabout. Adding additional housing to this already hugely congested area and potentially upwards of 250 extra vehicles (realistically this would be more!) is irresponsible without a major revision to the access points provided onto/off of the estate.

I trust my views will be noted and taken into consideration.

Many thanks and regards

Mrs Helen Abbott

[Get Outlook for iOS](#)

**Felicia Blake**

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**From:** Grahame Stuteley ·  
**Sent:** 28 February 2020 15:36  
**To:** PlanningPolicy  
**Subject:** Public consultation for the Ipswich Local Plan Review Final Draft (February 2020) - submission of representation for Turret Lane  
**Attachments:** ipswich Borough Council Local Plan final draft comments form - Turret Lane representation.pdf; 200228 Turret Lane representation letter and plan - final.pdf

Dear Sirs

On behalf our client, Mr Norman Agran, please find attached our submission for your consideration as part of the February 2020 consultation for the Ipswich Local Plan Review (Final Draft). Our submission is made in support of land at Turret Lane, Ipswich. Our representation contains a letter, a completed copy of the Response Form and a Site Location Plan showing the extent of the land within our client's ownership.

I trust this is helpful and I would be most grateful if you could acknowledge receipt of this email for my records.

Thank you.

Regards



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Grahame Stuteley BSc (Hons) MSc MRTPI  
Senior Planner

Bidwell House, Trumpington Road, Cambridge, Cambridgeshire. CB2 9LD  
| [bidwells.co.uk](http://bidwells.co.uk)



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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	<b>Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft</b>  <b>Site Sheets Part 1- IP003 – IP067a &amp; b;</b>  <b>Final Draft Local Plan Review Policies Map IP-One Area Inset;</b>
Please return this comments form to:	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	Part A – Personal details  Part B – Your comment(s).

#### PART A PERSONAL DETAILS

	1. Personal details	2. Agent's details (if applicable)
Title		Mr
First name		Steven
Last name		Butler
Job title ( <i>where relevant</i> )		Associate
Organisation ( <i>where relevant</i> )		Bidwells LLP
Address (Please include post code)		Bidwell House Trumpington Road Cambridge CB2 9LD
E-mail		
Telephone No.		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation (*and client if you are an agent*):

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft</b>	<p>Please refer to the appended Turret Lane representation letter dated 28/02/2020. This relates to:</p> <p>(P.23) Policy SP2 'Land Allocated for Housing' (Table 1 - Land allocated for residential use or residential-led mixed use) – reference IP054b.</p> <p>(P.48) Chapter 5: 'IP-One Area' – reference 5.5 regarding Turret Lane allocations.</p> <p>(P.58) Policy Sp15 'Improving Pedestrian and Cycle Routes' – reference key walking routes from Waterfront to the Central Shopping Area (via Turret lane).</p>
<b>Site Sheets Part 1- IP003 – IP067a &amp; b;</b>	<p>Please refer to the appended Turret Lane representation letter dated 28/02/2020. This relates to:</p> <p>IP054b (Land allocated for Residential Use).</p>
<b>Final Draft Local Plan Review Policies Map IP-One Area Inset;</b>	<p>Please refer to the appended Turret Lane representation letter dated 28/02/2020. This relates to:</p> <p>IP054b (Redevelopment will be dependent on the Intentions of existing businesses).</p>

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.

Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.

Adoption of the Ipswich Local Plan Review.

### PRIVACY NOTICE

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.



# BIDWELLS

Your ref:	Ipswich Local Plan Review Final Draft Consultation
Our ref:	SB/LPRrepFeb20
DD:	
E:	
Date:	28 February 2020

Ipswich Borough Council - Planning Policy Team  
Planning and Development  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

Dear Sir or Madam

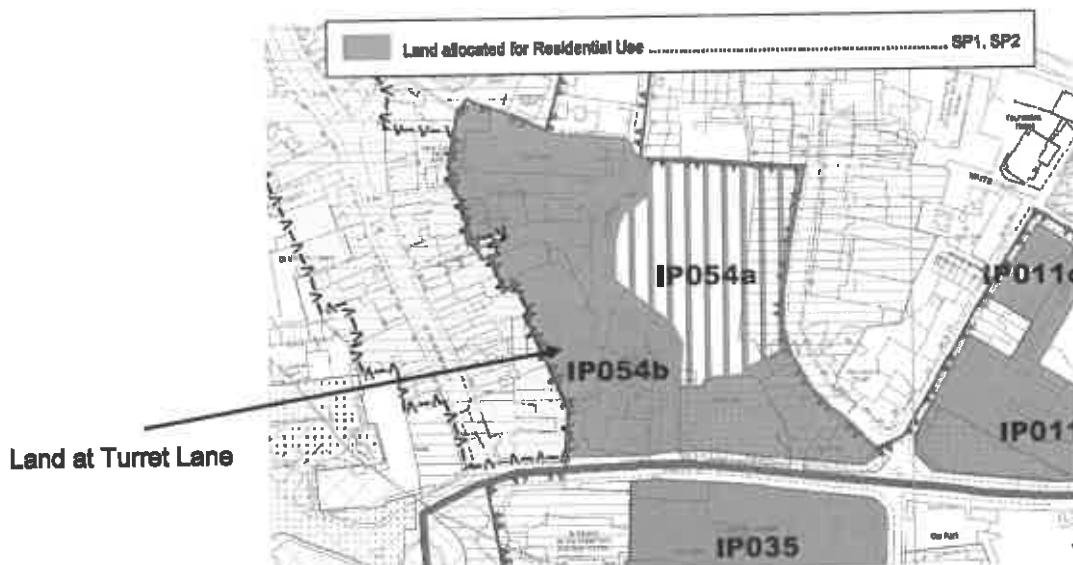
**PUBLIC CONSULTATION FOR THE IPSWICH LOCAL PLAN REVIEW FINAL DRAFT FEB 2020 –  
REPRESENTATION IN RELATION TO PROPOSED ALLOCATION IP054B – LAND BETWEEN OLD  
CATTLE MARKET AND STAR LANE**

On behalf of our client, Mr Norman Agran, please find our submission enclosed in support of land at Turret Lane, Ipswich, IP4 1DL. Our submission contains a completed copy of the Response Form and a Site Location Plan showing the extent of the land within our client's ownership. Our client currently owns 9 commercial units within proposed residential site allocation IP054b within the 'IP-One Area' of Ipswich. The extent of the landownership is shown on the accompanying Site Location Plan.

The adopted Local Plan designates the IP054b area for commercial and/or residential uses, but the Final Draft Local Plan proposes the IP054b area solely for residential use – as shown on the proposals map extract at Figure 1 overleaf. We have no objection to the continued residential allocation, but we object to the proposed removal of the existing commercial allocation.

NPPF paragraph 11 states that '*plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.*' Given that the proposed policy approach to IP054b does not reflect the current land uses, we consider that the policy is too rigid, not sufficiently flexible, inconsistent with national planning policy and therefore unsound.

The site area for proposed allocation IP054b is highlighted in the Ipswich Economic Area Employment Land Supply Assessment (Lichfields, April 2018) which states 'Site is in B1c (light industrial) use which is considered suitable for the site and location, as well as other B1 uses' (Appendix 2, p.58), and the Council's site assessment sheets 'Site Sheets Part 1- IP003 – IP067a & b' acknowledge the existing uses at the site, stating that '*Redevelopment will be dependent on the intentions of existing businesses*'.



*Figure 1: extract from the Final Draft proposals map, showing the area proposed for residential allocation under policy IP054b*

Proposed allocation IP054b encompasses several units which have established commercial, employment and associated supporting uses. Whilst we recognise the emerging Local Plan's aspiration to maximise opportunities to deliver housing on suitable sites, with particular focus on brownfield land in town centre locations that are sustainably located, we consider that the IP054b allocation requires greater flexibility allowing for the continuation of existing established uses. Paragraph 80 of the NPPF 2019 states that '*Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.*' Future development proposals within the allocated area should not be restricted solely to residential use as this would result in the existing business units being restricted should they wish to expand their current operations within our client's land holding.

We therefore request that the Council employs a more flexible approach in this regard and we suggest that the allocation reverts to its existing flexible residential and/or commercial uses.

The adopted Local Plan currently includes such flexibility and we consider that this should be maintained through the emerging Local Plan process and reflected in the explanatory text for this proposed allocation. I trust this letter sufficiently explains our position in reference to proposed allocation IP054b, as we support a residential use, however consider that this should also include B1 commercial uses as stated.

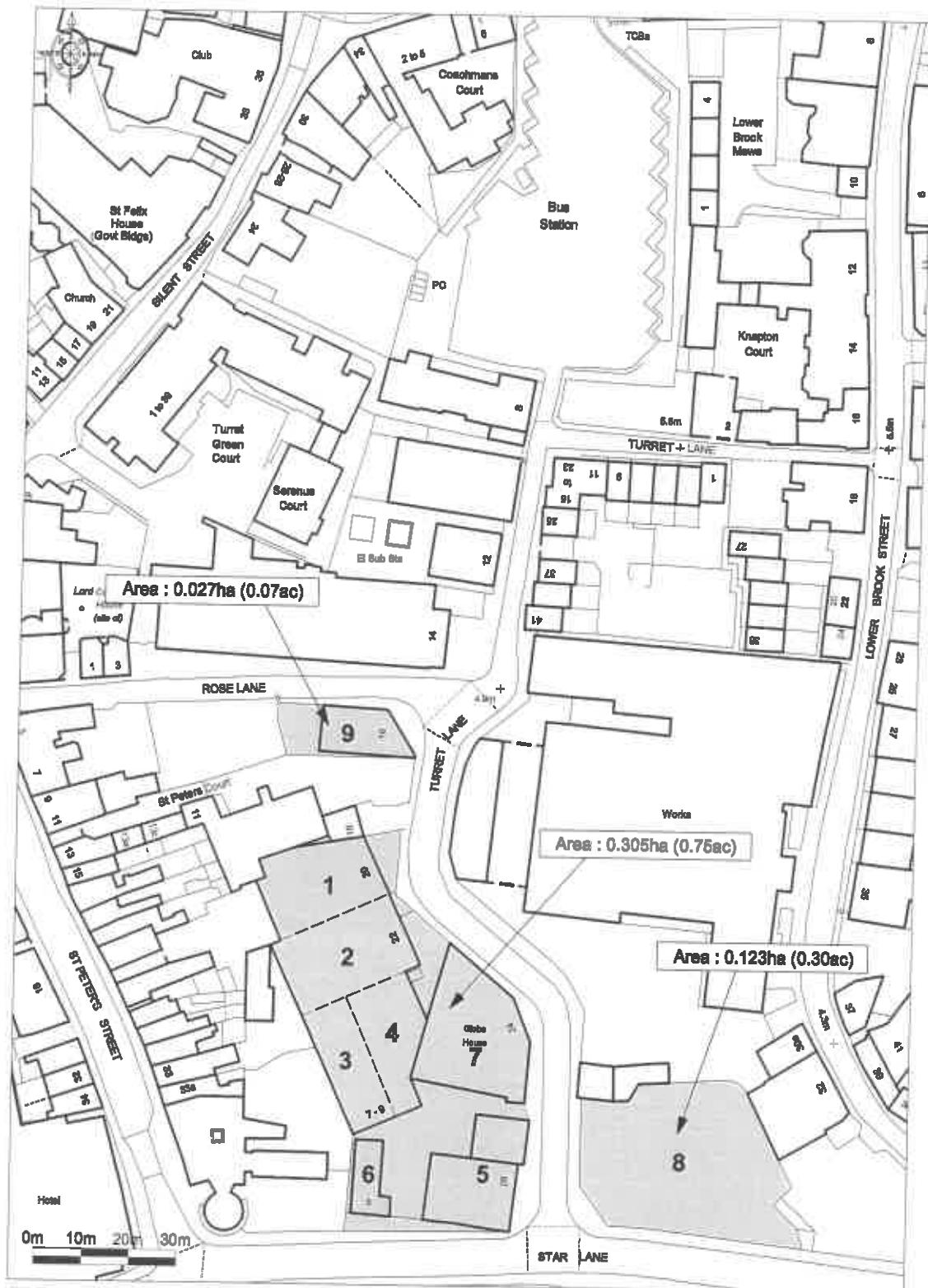
If you require further details regarding the contents of this letter, then please get in touch to discuss.

Yours faithfully

**Steven Butler**  
Associate, Planning

**Enclosures      Consultation Comments Form, Site Location Plan**

# Norman Agran - Ipswich Properties



 Promap®

Drawing Number: A.39.654  
O.S. Ref: TM 1644  
Date: 3/11/2010

BIDWELLS

T: 01473 611644  
[bidwells.co.uk](http://bidwells.co.uk)

This submission is **confirmed**

[26248]

### Support Chapter 7 - Key Diagram

Respondent: [AONB \(Ms Beverley McClean\) \[2286\]](#)

Received: **28/02/2020 via Web**

Diagram 3 has been amended to include the small area of the Suffolk Coast & Heaths AONB that falls within the Ipswich Local Plan boundary. This change was requested by the AONB team in representations submitted to the Preferred Options consultation

**Representation at examination:** Written Representation

This submission is **confirmed**

[26252]

### Support Policy CS4 Protecting our Assets

Respondent: [\*\*AONB \(Ms Beverley McClean\) \[2286\]\*\*](#)

Received: **28/02/2020 via Web**

The AONB team welcomes the amendment to bullet point (h) Policy CS4 which will help ensure that the purposes for designation of the Suffolk Coast & Heaths is recognised and that the Natural Beauty & Special Qualities of the nationally designated landscape is considered as part of decision making.

**Representation at examination:** Written Representation

This submission is **confirmed**

[26254]

### Support Policy DM8 The Natural Development

Respondent: [AONB \(Ms Beverley McClean\) \[2286\]](#)

Received: 28/02/2020 via Web

The AONB team support the objectives of this policy. European protected sites are now called Habitats Sites and the policy should be amended to reflect this for accuracy- see below

#### Sites of International and National Importance

Proposals which would have an adverse impact on Habitats Sites will not be permitted, either alone or in combination with other proposals, unless imperative reasons of overriding public interest exist in accordance with the provisions of the European Habitats Directive.

**Representation at examination:** Written Representation

This submission is **confirmed**

[26255]

Support Policy DM11 Countryside

Respondent: [\*\*AONB \(Ms Beverley McClean\) \[2286\]\*\*](#)

Received: **28/02/2020 via Web**

The change to policy DM11 with regards the AONB is acknowledged and welcomed. This change was requested by the AONB team as part of our representations to the Preferred Options consultation.

**Representation at examination:** Written Representation

This submission is **confirmed**

[\[26256\]](#)

Support Policy DM8 The Natural Development

Respondent: [AONB \(Ms Beverley McClean\) \[2286\]](#)

Received: **28/02/2020 via Web**

The title link to policy DM8 under Chapter 9 currently reads The Natural Development. This should be changed to read The Natural Environment

**Representation at examination:** Written Representation

This submission is **unconfirmed**

[\[26257\]](#)

### Support Policy DM34 Delivery and expansion of Digital Communication Networks

Respondent: [AONB \(Ms Beverley McClean\) \[2286\]](#)

Received: **28/02/2020 via Web**

The AONB team is concerned about potential impacts of new 5G technology and other telecommunications equipment on the Natural Beauty of the Suffolk Coast & Heaths AONB.

The team is seeking the following amendment to criteria b of policy DM34

b. Proposals for the expansion of electronic communications networks, including next generation mobile technology (such as 5G) will be supported, where they preserve the historic environment, do not harm the Natural Beauty of the AONB and/or the appearance of the street scene.

**Representation at examination:** Written Representation

This submission is **confirmed**

[\[26259\]](#)

### Support Policy SP5 – Land Allocated for Employment Use

Respondent: [AONB \(Ms Beverley McClean\) \[2286\]](#)

Received: **28/02/2020 via Web**

Site P141a Land at Futura Park

The Futura Park sites lies within 200m of the boundary of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty and therefore lies within the setting of the nationally designated landscape. Whilst we acknowledge that much of this site is already built out and is physically separated from the AONB by the A1189, any future development especially site IP141a should be supported by an assessment of impacts on the Natural Beauty of the AONB.

The need for such an assessment should be reflected in the policy text for this site.

**Representation at examination:** Written Representation

This submission is **confirmed**

[26267]

Support Site Sheets, Site Ref: IP150b (Policy SP7) Land south of Ravenswood

Respondent: [AONB \(Ms Beverley McClean\) \[2286\]](#)

Received: 28/02/2020 via Web

Site IP150b which is being proposed for sport uses lies within the setting to the Suffolk Coast & Heaths AONB. Flood lighting has the potential to impact on the AONB.

The site sheet and relevant section in Policy SP5 fails to identify the AONB as a constraint. The site sheet and policy needs to be amended to reflect this. Assessment of impact on the AONB is also needed

**Representation at examination:** Written Representation

This submission is **confirmed**

[26268]

Support Site Sheets, Site Ref: IP149 (Policy SP8) Pond Hall Farm

Respondent: [AONB \(Ms Beverley McClean\) \[2286\]](#)

Received: **28/02/2020 via Web**

The AONB team maintains its support for the inclusion of land at Pond Hall Farm as an extension to Orwell Country Park

**Representation at examination:** Written Representation

This submission is **confirmed**

[\[26285\]](#)

### Object Policy SP7 – Land Allocated for Leisure Uses or Community Facilities

 [Has attachments](#)

Respondent: [AONB \(Ms Beverley McClean\) \[2286\]](#)

Received: **28/02/2020 via Web**

Site IP150b which is being proposed for sport uses lies within the setting to the Suffolk Coast & Heaths AONB. Flood lighting has the potential to impact on the AONB. The site sheet and relevant section in Policy SP7 fails to identify the AONB as a constraint. The site sheet and policy needs to be amended to reflect this. Assessment of impact on the AONB is also needed.

**Changes to plan:** Site sheet needs to be amended to identify the AONB as a constraint and to identify the need to assess the impact on the AONB.

Document legality not specified

Document is not sound

Document duty to cooperate not specified

**Representation at examination:** Not specified

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

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Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	Development Plan – Final Draft Site Allocations and Policies – Final Draft Policies Map – Final Draft
Please return this comments form to:	<p><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</p> <p>Planning Policy Team        Planning and Development        Ipswich Borough Council        Grafton House        15-17 Russell Road        Ipswich        IP1 2DE</p>
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	<p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
Title	-	Mr
First name	-	Mark
Last name	-	Harris
Job title ( <i>where relevant</i> )	-	Director
Organisation ( <i>where relevant</i> )	Aquigen (Nacton) LLP	Freeths LLP
Address <i>(Please include post code)</i>	c/o Agent	1 Vine Street London W1J 0AH
E-mail	-	
Telephone No.	-	

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Aquigen (Nacton) LLP
--	----------------------

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Policy CS13	See accompanying sheet
Policy DM32	See accompanying sheet
Policy SP5/Site Allocation IP141a and Proposals Map	See accompanying sheet
Appendix 6	See accompanying sheet

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Policy DM31	See accompanying sheet

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

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The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

# FREETHS

## IPSWICH BOROUGH COUNCIL LOCAL PLAN REVIEW: FINAL DRAFT CONSULTATION (JANUARY – MARCH 2020)

### REPRESENTATION ON BEHALF OF AQUIGEN (NACTON) LLP (2<sup>nd</sup> MARCH 2020)

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#### Introduction

1. We act on behalf of AquiGen (Nacton) LLP ("AquiGen") in relation to the Futura Park site which is under their freehold control and management. On behalf of Aquigen, we previously submitted representations to the Plan at the Regulation 18 stage and continues to welcome the opportunity to participate in the preparation of the Local Plan.
2. As you will be aware, Futura Park extends to 17.63ha and has a wide range of land and premises which are occupied by retail, business, industrial and *sui generis* car showroom businesses. Since being developed from the original December 2011 Planning Permission, there is now only 2.5ha of land that is remaining for development. This is Site 1 (0.9ha) and Site 3 (1.6ha) in the south-eastern corner of the site bound by Crane Boulevard and Nacton Road. The location of the sites is provided on the Plan provided at Appendix 1.
3. Site 1 is to be the subject of a planning application expected to be submitted in April 2020. Site 3 is the subject of a current planning application submitted in January 2020 for an Industrial Warehousing building (IBC Application Ref: IP/20/00137/FUL). Subject to planning, both sites and schemes are expected to be delivered by 2021 which will then complete the development of Futura Park.
4. The progress of the Local Plan review is therefore timely, as it offers an opportunity to align site-specific policy with the delivery of the last elements of Futura Park.
5. Based on the status of Futura Park and their existing and anticipated strategy together with representations made to date, AquiGen wishes to make a representation on the following draft Matters and Draft Policies:

**Employment and Site-Specific Allocation:**

- Policy CS13: Planning for Jobs Growth.
- Policy DM32: Protection of Employment Land.
- Policy SP5 – Site Allocation IP141a – Land at Futura Park, Nacton Road.
- Appendix 6: Marketing Requirements.

**Retail:**

- Policy DM31: Retail Proposals outside Defined Centres.

6. Our representation is outlined overleaf with a summary of our recommendations provided as a conclusion.

## Employment and Site Specific Allocation

### ***Policy CS13: Planning for Jobs Growth***

7. AquiGen acknowledges the sustainable economic growth strategy of the Plan as expressed in this Policy. To ensure the Plan is positively prepared and effective, it is however important that it is based on proportionate evidence and seeks to meet an area's objectively assessed needs. To achieve this, the amount of land proposed for allocation should be consistent with the needs identified in the Evidence Base, unless there is justification for over or under provision.
8. Our Regulation 18 representation set out observations on the employment evidence base as it related to the Futura Park site which has not been addressed. Accordingly, we wish to maintain our objection for the reasons outlined below.
9. We note that the 28.3ha employment land allocation requirement is based on the findings of the Ipswich Economic Sector Needs Assessment (Lichfields, September 2017) ("ESNA"). The Plan (see paragraph 8.167) and accompanying Topic Paper (Economy, IBC January 2019 – see paragraph 76) confirm that the land allocation requirement itself has been adjusted downwards on a pro-rata basis to 23.2ha based on an update of the baseline data. The 23.2ha requirement therefore represents the most up-to-date figure upon which to base land use allocation decisions.
10. When the 23.2ha requirement is compared with the total amount of land allocated for employment use (28.34ha) under Policy SP5 (Table 3), it is evident that there is a significant amount of land that has been allocated in excess of the calculated requirement. The 5.14ha difference equates to circa 18% of the calculated requirement. Even allowing an appropriate allowance for Plan flexibility, the excess amount of land that is proposed for allocation is not justified. Such a level of over-provision can only be justified where there are clear reasons for a land supply buffer. No such evidence has been presented by IBC in the Plan and / or supporting evidence base, so it is entirely appropriate to consider reducing the land allocation so it more readily reflects the actual need position. This will ensure consistency with NPPF paragraph 120 and ensure allocations reflect the up-to-date need position.
11. The level of potential over-supply is also evident when the employment allocation target is compared with the net land requirements for Use Class which has been calculated in the Evidence Base. In this regard, Table 7.10 of the Employment Land Needs Assessment ("ELNA") (NLP, March 2016) advises that the Ipswich area requires 9.0ha of Industrial (Use Class B1c/B2/B8) land out of the overall 23.5ha requirement. We have identified that of the land allocations outlined in Policy SP5 Table 3, circa 24ha has been identified as being suitable for Industrial related land and uses (e.g. non B1/B1a). This is in significant excess of the 9.0ha need calculation and again far greater a buffer than is required.
12. Based on the over-allocation of land identified by the Evidence Base, we consider that the proposed allocations under the Local Plan require further review. This is to ensure the Local Plan is justified and consistent with the Evidence Base. If not, the Local Plan cannot be found sound. In order to achieve soundness, we recommend the proposed allocations are reviewed to reduce the amount of land that is allocated to be more consistent with the Evidence Base. Against this background, we recommend that the amount of land identified for allocation in the Plan is reduced under Policy CS13 criterion a) and the supporting

# FREETHS

paragraphs. This can be resolved by reviewing the availability and suitability of land such as Futura Park which no longer needs to be protected for Employment Land for the reasons outlined below.

## ***Policy DM33: Protection of Employment Land***

13. We note that this Policy continues to only specifically allow for consideration of no reasonable prospect of re-use for employment purposes for sites outside the defined Employment Areas. There is then ambiguity in the supporting paragraphs as paragraph 9.32.2 and 9.32.4 suggest that the no reasonable prospect test could be applied to defined Employment Area land.
14. As NPPF paragraph 120 relates to allocated land and recommends the use of the no reasonable prospect test, to ensure consistency with the NPPF, we recommend Policy DM33 is amended to allow the test to be applied to all defined Employment Area land. This will ensure the Plan is consistent with national guidance and adequately flexible to deal with changing market signals and needs. This is particularly important given the surplus allocation position compared with need as identified in our assessment.

## ***Policy SP5 – Site Allocation IP141a(1) – Land at Futura Park, Nacton Road (formerly the Cranes Site)***

15. As part of the review of the Evidence Base and proposed allocations, consideration should be given to whether there is a reasonable prospect of an application coming forward for the use allocated in the Plan (consistent with NPPF paragraph 120).
16. We consider that both Sites 1 and 3 are suitable candidates for removal from the employment use allocation. This is on the following grounds:
  - (i) The Futura Park site as a whole has been the subject of extensive marketing since early/mid 2012 associated with the original grant of Planning Permission for the overall site. This has included a site-specific website: <http://www.futura-park.com> and a marketing campaign undertaken by regional and national property agents.
  - (ii) There has been no interest in the Site 1 frontage plot for B Class uses consistent with the 2011 Permission based on marketing undertaken since 2011. The marketing evidence compiled since this date has been shared with IBC Officers. This also confirms no interest in the plot for industrial purposes consistent with Site Allocation IP141a(1).
  - (iii) The Site 1 plot is serviced and has benefitted from a masterplan permission. Despite the absence of any genuine planning obstacles and every effort being made to encourage interest and demonstrate ease of delivery, the site has attracted no interest.
  - (iv) The Site's designation as part of the New Anglia Enterprise Zone in Spring 2016 has been reflected in marketing since that time period. This has not led to any new interest.
  - (v) Critically, the Site 1 frontage plot has a different townscape character to the remaining parts of Futura Park due to its proximity to residential properties, its spatial

# FREETHS

relationship and connectivity with the Ravenswood Centre and the Nacton Road frontage, including the existing/protected landscaping. This was reflected in the original masterplan which identified the Site for office use as opposed to large scale industrial / warehouse buildings and uses which would be less compatible with the physical context. The Local Plan now restricts offices outside of the Town Centre so that it is necessary and entirely appropriate to identify alternative land uses that are compatible with the site's context.

- (vi) Due to the position on Nacton Road, the Site 1 frontage plot could accommodate other non B Class uses taking benefit from its road-side prominence, pedestrian accessibility and proximity to other uses such as the Ravenswood District Centre. This can have economic and social benefits for the area through development rather than prolonged vacancy.
  - (vii) The delivery of B class development by Chancerygate elsewhere in Futura Park and the progression of plans for Site 3 has met any B Class / industrial demand there may be for the site as demonstrated by the extensive marketing period.
  - (viii) The position of Site 3 (the north-eastern part of the site allocation) in Futura Park has led to interest in B Class commercial/industrial development. This has resulted in the planning application referred to earlier (see paragraph 3). However, the characteristics of this site and its suitability for large scale shed development are quite distinct from Site 1 on the Nacton Road frontage. As that site is proceeding and will be delivered before Plan adoption, there is now no need to retain it as a specific allocation.
17. Based on this extensive time period, we conclude that there is no reasonable prospect of the Site 1 frontage plot being used for employment purposes consistent with the present and proposed Local Plan allocation. As the marketing has been active / continuous for a period significantly in excess of twelve months, there is more than sufficient justification to consider the plot's removal as an employment allocation. If tested as part of a Planning Application, the marketing evidence could also achieve compliance with Local Plan DM33 and supporting paragraph 9.33.4. This further emphasises the justification for removal of the designation now and allow for alternative uses on Site 1 to be considered on their merits as part of the development management process.
18. The removal of the Site 1 plot will have also no material impact on employment land supply in the Ipswich area. As identified in our analysis above, there is already an over-supply of proposed allocations in the Plan. The removal of this 0.9ha plot will result in a residual land supply of 27.44ha (when deducted from the Policy SP5 Table 3 total). The removal of the Site also still leaves circa 23.1ha of suitable Industrial land in excess of the 9ha identified in Table 7.10 of the ELNA.
19. When combined with the extensive marketing undertaken on this site, it is clear that to achieve consistency with NPPF paragraph 120 a), there is now sufficient and robust justification to remove what is in effect a residual employment allocation from the overall Policy IP141a(1) site. This will then allow for the final Futura schemes to be determined on their merits, providing both B Class & other employment generating development.

20. If a decision is made to retain Policy IP141a(1), further consideration needs to be given to the content of the "Development constraints / issues" text which would be used to inform planning applications on the site. At present, the wording of certain parts of the text is overly and unnecessarily restrictive and could act as a barrier to development. We recommend the following amendments:

- **Design:** due to the commercial nature of the area and the operational and floorspace efficiency requirements of prospective tenants, it is often necessary to deliver "single volume warehousing". Provided it is demonstrated that the scheme constitutes good design (see NPPF section 12) and complies with the wider generic based policy requirements of the Development Plan then this can be approved as an appropriate approach. There has also been no specific landscape or design character evidence supporting the Local Plan which identifies Futura Park as requiring a special approach to design. On this basis, we recommend removal of the phrase "...and avoids utilitarian single volume warehousing." This will ensure the Plan is sufficiently flexible and allows for schemes to be justifiably promoted and justified on their own merits, particularly protecting the importance of delivering economic benefits generated by single warehouse development.
- **Nacton Road Frontage:** the commercial requirements of operators necessarily include car parking, buildings set back from frontages and open areas to support operational activity. This also assists in making a commercial development location such as Futura Park as attractive as possible. This can often lead to the formulation of buildings and spaces that only have a single "active" frontage as it is otherwise important to retain "inactive" frontages for security and other operational reasons. This does not necessarily lead to unsuccessful urban design, provided the active frontage and wider elevational treatment combined with the overall approach of the scheme is appropriate and constitutes good design. On this basis and to support the delivery of Site 1 and its obvious economic and social potential, we recommended additional flexibility is introduced into this requirement as follows (new text in *bold*):

*Development along IP141a should explore the ability to address both Nacton Road and Crane Boulevard with active and/or positively designed frontages, and avoid being set back from the highway by extensive car parking to allow for a greater street scene impact, unless this can be justified as an appropriate response.*

21. These amendments will provide important and justified flexibility for the Plan and allow an applicant to demonstrate via the design process how a site has responded where possible to the characteristics of a site and how commercial considerations have been weighed in the balance to deliver positive economic and social development in accordance with the NPPF.

## **Appendix 6 – Marketing Requirements**

22. We continue to welcome the introduction of marketing requirements in Appendix 6 of the Plan as this offers the basis for early agreement and clarity between the Council and an Applicant on marketing of a site in accordance with Policy DM33. There are aspects of the requirements that are onerous and should be removed. These are:

- Paragraph 2.1: discussions with the Council before marketing is carried out is unnecessary if the marketing requirements in Appendix 6 are otherwise to be followed.

# FREETHS

This also adds another hurdle to the planning process and can delay marketing commencing promptly.

- Paragraph 2.5: we note and welcome this paragraph being amended to instead require a simpler schedule noting the origin of an enquiry (e.g. the Agent acting) and the reason for interest is sufficient.
- Paragraph 2.6: a commercial site is not generally marketed at a set market value as this is then determined by the offer that a purchaser is willing to make (based on their own professional judgement and advice received). An 'All Enquiries' marketing exercise is entirely appropriate as this generates enquiries based on all potential purchase options e.g. freehold / leasehold purchase or rent.

23. We recommend Appendix 6 is further revised to reflect these comments in order to ensure it follows Industry best practice and avoids requiring onerous marketing requirements which will only delay site availability and planning decisions.

#### ***Policy DM32: Retail Proposals outside Defined Centres***

24. We note the content and requirements of this policy. We object to criterion (a) which requires consideration of the appropriateness of scale when assessing out-of-centre retail proposals. The use of 'scale' is no longer recommended by national guidance and is therefore inconsistent with NPPF paragraphs 86 and 89 which only require an applicant to demonstrate compliance with the Sequential Approach and Impact. As identified at paragraph 89 b), scale forms part of the consideration of Impact. There is no therefore no requirement to demonstrate appropriateness of scale, separate from impact. In addition, a requirement to demonstrate scale has not been identified by the Evidence Base as a retail policy requirement based on the characteristics of the area.

25. On this basis, we recommend criterion (a) is removed to ensure consistency with the NPPF.

#### **Recommendations**

26. Based on the above assessment, we make the following recommendation:

- (i) Policy CS13: the amount of land allocated for employment land development should be reduced to circa 23ha of land to be consistent with the Evidence Base.
- (ii) Amend Policy DM33 to make it clear that the no-reasonable prospect test also applies to defined Employment Sites to be consistent with the NPPF.
- (iii) Remove both plots from the Employment Land Allocation under Policy SP5 Site Allocation IP141a(1) as it has been demonstrated that there is no reasonable prospect of employment development proceeding on Site 1 based on the extensive and comprehensive marketing undertaken since 2011. Furthermore, the office use for which it was previously identified is no longer acceptable in policy terms. Also Site 3 is in the process of being delivered for B class use so will make a contribution to employment land supply in advance of Plan adoption.

# FREETHS

- (iv) If Policy SP5 Site Allocation IP141a(1) is retained the development constraints/issues text would benefit from focused amendment to avoid unnecessary design constraints which will delay the delivery of beneficial economic and social development.
  - (v) Further amend the Appendix 6 Marketing Requirements to avoid onerous requirements.
  - (vi) Remove criterion (a) of Policy DM32 in relation to demonstrating appropriateness of scale to be consistent with the NPPF.
27. We look forward to receiving acknowledgement of this representation marked for the attention of Mark Harris and being notified on the Plan's progress.

Mark Harris  
Director, London / Planning and Environment Group

**LAND AT FUTURA PARK IPSWICH SUFFOLK**  
**IBC LOCAL PLAN REVIEW**

1:2500 @ A3 Dwg No 514-026



# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	<b>Core Strategy and Policies Development Plan Document Review Final Draft</b>
Please return this comments form to:	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  <b>Planning Policy Team</b> <b>Planning and Development</b> <b>Ipswich Borough Council</b> <b>Grafton House</b> <b>15-17 Russell Road</b> <b>Ipswich</b> <b>IP1 2DE</b>
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

#### **PART A PERSONAL DETAILS**

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
Title		Mr
First name		John
Last name		Bowles
Job title ( <i>where relevant</i> )		Director
Organisation ( <i>where relevant</i> )	Associated British Ports	Savills
Address (Please include post code)	Ipswich Port	33 Margaret Street London W1G 0JD
E-mail		
Telephone No.		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Savills on behalf of Associated British Ports ('ABP')
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Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>ABP is the owner and operator of the Port of Ipswich which is the UK's leading grain exporter and largest of ABP's short-sea ports and which, together with ABP's other East Anglian Ports at Kings Lynn and Lowestoft, contributes some £360m directly into the UK economy every year and supports 3,700 jobs in the region and 5,300 jobs nationally (2019 figures).</p> <p>The Port of Ipswich provides an extensive range of facilities to meet the needs of businesses and industry based in Norfolk and Suffolk. It is the UK's leading grain exporter and largest of ABP's short-sea ports with the ability to handle containers, dry bulks and aggregates, forest products, general cargo and offering extensive roll-on roll-off facilities. The total port area (including water) is approximately 111 ha (275 acres) and the Port handles more than three million tonnes of goods per year. The Port is rail connected and can offer intermodal services from the Port to inland facilities including rail terminals such as ABP's own Hams Hall Railfreight Terminal in the Midlands. The Port is also the base for expanding marina activities.</p> <p>The importance of the Port continuing to flourish as a major economic driver in the sub-region and its 'significant role' in driving further growth in the region through future expansion is recognised in the NALEP Strategic Economic Plan and the adopted Core Strategy.</p> <p>As well as maintaining its operational activities, ABP is concerned to ensure that it retains the right and ability to fully use its land and infrastructure for port purposes in the performance of its statutory duties and responsibilities as a harbour undertaking. Whilst, therefore, ABP is keen to support the realisation of the wider development objectives and aspirations of the Core Strategy and Policies DPD Review, it must protect its 'significant (economic) role' and ability to expand further and assist in driving growth in the region. New development should be sensitive to these existing uses and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.</p> <p>The 'Island Site', which is identified by Ipswich Borough Council (IBC) and its partners as one of the key regeneration opportunities in central Ipswich, is within ABP's land ownership and presently accommodates successful high profile marine businesses and the commercially successful Ipswich Haven Marina (which has contributed significantly to the regeneration so far of the Waterfront area).</p> <p>ABP is supportive of the redevelopment of the Island Site (it is one of ABP's 'pathfinder projects') subject to its redevelopment being commercially viable and deliverable. ABP's vision for 'Ipswich Island' is that it will be a viable, high quality, sustainable, residential led mixed use development that maximises its waterfront location. The development will be true mixed use, incorporating (alongside homes); boat building, other maritime activities and leisure uses, enhancing connectivity between the site, the Town Centre and the Station as well as around the Waterfront (including via a new circular Maritime Trail).</p> <p>However, until a satisfactory scheme is agreed with IBC for its redevelopment, ABP reserves the right to continue to use the Island Site as operational port area</p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<p>and to restrict access in the interests of public safety and port security.</p> <p>ABP's representations on the Core Strategy and Policies DPD Review Final Draft below are made in this context.</p>
<b>Policy CS2</b>	<p>The Island Site is situated within the Waterfront area to which this policy applies. As noted at para 5.21, parts of the operational port are also within it. In that context, ABP notes the desire of IBC to secure high density development in the interests of maximising the use of previously developed land, subject to that not compromising heritage assets and the historic character of Ipswich.</p> <p>For a variety of reasons, including the mix of existing and proposed uses on the site, ABP's vision for the Island Site (agreed with the partners and the LEP) does not envisage 'high density' development as currently defined in Final Draft Policy DM23. Given this, ABP request the inclusion of additional wording in the final paragraph of Policy CS2 which should be amended as follows "<i>...and low elsewhere, unless otherwise agreed through masterplans and provided that in all areas it does not compromise heritage assets..</i>" or wording of similar effect.</p>
<b>Policy CS3</b>	<p>ABP supports the regeneration objectives for the IP-One area. There are, however, important elements of the Port within or adjacent to this area. New development should, therefore, have regard to these existing port uses and activities so as to ensure that they are protected.</p> <p>The Port of Ipswich is situated both within and immediately adjoining the Waterfront area of IP-One. As well as maintaining its operational activities, ABP is concerned to ensure that it retains the right and ability to fully use its land and infrastructure for port purposes in the performance of its statutory duties and responsibilities as a harbour undertaking. The importance of the Port continuing to flourish as a major economic driver in the sub-region is recognised in the NALEP Strategic Economic Plan and at paragraphs 3.3, 5.6, 6.20, 8.171 – 8.172, 8.174 and 9.33.5 – 9.33.6 (consistent with the advice in the Ports NPS). ABP would wish to ensure that the Port's 'significant (economic) role' and ability to expand further and assist in driving growth in the region is protected.</p> <p>ABP requests that recognition is made in Policy CS3 and its accompanying text to the Port and to other important existing employment and other activities within and adjoining the IP-One area which the Council wishes to safeguard and support. New development should be sensitive to these existing uses and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.</p> <p>We request, therefore, the addition of a new criterion into any new policy based on Policy CS3:</p> <p><b><i>"New development should be sensitive to existing uses (including those at the Port of Ipswich) and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses."</i></b></p> <p>We note and support the inclusion of similar wording to this effect in Policy CS13.</p>
<b>Policy CS8 and para 8.121</b>	<p>ABP welcomes IBC's policy on housing type and tenure mix and the recognition of potential exceptions to these requirements in response, for example, to viability constraints. ABP also notes the desire of IBC to secure high density development on central sites (para 8.121) which will also assist viability. However, high density may not be appropriate in all instances.</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<b>Policy CS12</b>	ABP notes the requirement for major new development (10+ dwellings) to provide 15% affordable housing and welcomes the flexibility within the wording of Policy CS12 both in respect of the proportion of affordable housing and tenure mix where development viability justifies it.
<b>Policy CS13</b>	In the context of the above comments, ABP welcomes and supports the inclusion in Policy CS13 of reference at sub-point b. to the need to protect <i>'land for employment uses in existing employment areas defined on the policies map, including the function and strategic role of the port to Ipswich'</i> in response to ABP's specific request for such reference in the previous Core Strategy and Policies Development Plan Document Review Preferred Options.
<b>Policy CS20 and paras 8.222 to 8.225</b>	<p>Provision of significant alternative east-west transport capacity has been a longstanding aspiration of Suffolk County Council (SCC), IBC and its 'Ipswich Vision' partners. This would provide for through traffic and relief from town centre traffic congestion (particularly on the Star Lane Gyratory), opening up access opportunities and unlocking the development and regeneration potential of the whole Ipswich Waterfront area. ABP has been happy to assist the Council in developing a feasible solution in relation to access to the Island site.</p> <p>In the context set out above, ABP will continue to assist the Council in developing a feasible solution for east-west transport capacity for all modes and including appropriate access to the Island Site. ABP also supports the efforts of IBC and SCC to bring forward proposals to secure transport capacity improvements which will benefit traffic accessing and egressing the Port.</p> <p>In this context, ABP welcomes the intention of IBC to continue to make a case for highway improvements including a Wet Dock Crossing through the Local Transport Plan, and supports the recognition at para 8.243 that provision of a Wet Dock Crossing is not a pre-requisite of access improvements to enable development of the Island Site.</p> <p>In respect of the provision of additional access to the Island Site (para 8.246), whilst ABP is supportive of the redevelopment of the Island Site (it is one of ABP's 'pathfinder projects'), its delivery is dependent on commercial viability. Until a satisfactory scheme is agreed with IBC for its redevelopment, ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.</p> <p>ABP does not agree with inclusion of the statement at para 8.247 that <i>"at a minimum, a road bridge from the west bank to the Island Site...will be required to enable any significant development on the Island"</i>. The extent to which the existing route via St. Peter's Dock can accommodate vehicle access, and any need for additional road access, will depend on the amount of development that can acceptably and viably be accommodated on the Island. This will need to be established through the masterplan exercise referred to in Final Draft Policy SP2 of the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review and accompanying Site Sheet IP037. Indeed, based on present thinking that the Island Site will deliver a reduced density of approximately 150 units, additional vehicular access may not be needed.</p> <p>Until the completion of the master plan exercise and the necessary technical assessments accompanying it (including transport assessment as referenced on Site Sheet 037), it is not appropriate for the DPD to be so prescriptive about the need for a new road bridge and we would request the removal of reference to it.</p> <p>ABP's general support for access improvements in and around the Waterfront and onto the Island Site is conditional upon there being no operational impact on the Port. ABP will continue to work with and assist SCC, IBC and its partners in securing a development solution which addresses all port safety, security and operational issues and avoids any adverse impact on port and marine operations.</p>

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	<p>and which accommodates the existing marina and marine businesses in the future development of the Island Site so that they continue to contribute to an active and appealing waterfront environment for further regeneration.</p> <p>ABP would like to see improvement of the junctions on the A14 around Ipswich in order to accommodate existing and future growth. ABP supports the efforts of IBC and SCC to lobby Highways England for such improvements and investigation of other potential improvements to the A14 and A12(S) corridors.</p>
<b>Policy DM12</b>	<p>ABP is supportive of IBC's desire for all new development to be well designed and sustainable, for 25% of new dwellings to be built to Building Regulations standard M4(2), and for proposals to respect the special character and distinctiveness of Ipswich including ensuring good public realm design. However, this should not be at the expense of development viability and the policy should be applied flexibly in the context of the objective to achieve sustainable regeneration.</p>
<b>Policy DM13</b>	<p>ABP notes and objects to reference in the Policy under the section titled 'Conservation Areas' to demolition of buildings and to the consideration by the Council of "<i>the withdrawal of permitted development rights where they present a threat to the protection of the character and special interest of the conservation area</i>" (last two bullet points).</p> <p>As a port authority, ABP benefits from 'permitted development' rights (as a 'statutory undertaker') over land it owns which is classed as 'operational land' (as defined under Sections 263 and 264 of the Town and Country Planning Act). Under the terms of The Town and Country Planning (General Permitted Development) Order 1995 ('the GPDO') Part 17 is applicable to development by Statutory Undertakers in England. Reliance on its permitted development rights on its operational land within the Port estate (limited by environmental regulations and other considerations) is critical to the ability of ABP to fulfil its statutory duties. ABP will therefore strongly resist any steps taken by the Council to seek to withdraw the permitted development rights it benefits from.</p> <p>If reference to withdrawal of permitted development rights in this Policy is not meant to encompass the permitted development rights enjoyed by ABP, we would request specific clarification of this point.</p>
<b>Policy DM22</b>	<p>ABP welcomes IBC's qualification that it will not insist on the requirement to meet Nationally Described Space Standards if this is demonstrated to be unviable in specific cases.</p>
<b>Policy DM33</b>	<p>ABP supports the safeguarding of the operational areas of the Port through their definition as Employment Areas E9 and E12 on the Policies Map and under Policy DM33. We welcome the recognition at para 9.33.6 of the need for ABP's specific operational requirements and consents and licences for the handling and storage of hazardous substances to be taken into account in any development planned in the vicinity of these areas.</p>

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Plan 2 – Flood Risk	The Flood Risk areas defined on Plan 2 reflect, we understand, the definitive Flood Maps maintained and published by the Environment Agency. However, whilst the Environment Agency Flood Maps distinguish between Zone 3 and Zone 3 with tidal flood defence, Plan 2 does not. Given that it is the Environment Agency who are responsible for the update of these Maps (and that the frequency of these updates may not coincide with updates/reviews to the Local Plan), we request that Plan 2 and/or the Core Strategy and Policies Development Plan Document should include a note making clear that the flood zones shown on Plan 2 are indicative and that IBC will rely on the current Environment Agency Flood Maps to determine what flood risk zone any site may fall within for decision making purposes.

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.

Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.

Adoption of the Ipswich Local Plan Review.

### PRIVACY NOTICE

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

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**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft</b>
<b>Please return this comments form to:</b>	<b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b>  <b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b>
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>		<b>Mr</b>
<b>First name</b>		<b>John</b>
<b>Last name</b>		<b>Bowles</b>
<b>Job title (where relevant)</b>		<b>Director</b>
<b>Organisation (where relevant)</b>	<b>Associated British Ports</b>	<b>Savills</b>
<b>Address (Please include post code)</b>	<b>Ipswich Port</b>	<b>33 Margaret Street London W1G 0JD</b>
<b>E-mail</b>		
<b>Telephone No.</b>		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Savills on behalf of Associated British Ports ('ABP')
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Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>ABP is the owner and operator of the Port of Ipswich which is the UK's leading grain exporter and largest of ABP's short-sea ports and which, together with ABP's other East Anglian Ports at Kings Lynn and Lowestoft, contributes some £360m directly into the UK economy every year and supports 3,700 jobs in the region and 5,300 jobs nationally (2019 figures).</p> <p>The Port of Ipswich provides an extensive range of facilities to meet the needs of businesses and industry based in Norfolk and Suffolk. It is the UK's leading grain exporter and largest of ABP's short-sea ports with the ability to handle containers, dry bulks and aggregates, forest products, general cargo and offering extensive roll-on roll-off facilities. The total port area (including water) is approximately 111 ha (275 acres) and the Port handles more than three million tonnes of goods per year. The Port is rail connected and can offer intermodal services from the Port to inland facilities including rail terminals such as ABP's own Hams Hall Railfreight Terminal in the Midlands. The Port is also the base for expanding marina activities.</p> <p>The importance of the Port continuing to flourish as a major economic driver in the sub-region and its 'significant role' in driving further growth in the region through future expansion is recognised in the NALEP Strategic Economic Plan and the adopted Core Strategy.</p> <p>As well as maintaining its operational activities, ABP is concerned to ensure that it retains the right and ability to fully use its land and infrastructure for port purposes in the performance of its statutory duties and responsibilities as a harbour undertaking. Whilst, therefore, ABP is keen to support the realisation of the wider development objectives and aspirations of the Site Allocations and Policies DPD Review, it must protect its 'significant (economic) role' and ability to expand further and assist in driving growth in the region. New development should be sensitive to these existing uses and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.</p> <p>The 'Island Site', which is identified by Ipswich Borough Council (IBC) and its partners as one of the key regeneration opportunities in central Ipswich, is within ABP's land ownership and presently accommodates successful high profile marine businesses and the commercially successful Ipswich Haven Marina (which has contributed significantly to the regeneration so far of the Waterfront area).</p> <p>ABP is supportive of the redevelopment of the Island Site (it is one of ABP's 'pathfinder projects') subject to its redevelopment being commercially viable and deliverable. ABP's vision for 'Ipswich Island' is that it will be a viable, high quality, sustainable, residential led mixed use development that maximises its waterfront location. The development will be true mixed use, incorporating (alongside homes); boat building, other maritime activities and leisure uses, enhancing connectivity between the site, the Town Centre and the Station as well as around the Waterfront (including via a new circular Maritime Trail).</p> <p>However, until a satisfactory scheme is agreed with IBC for its redevelopment, ABP reserves the right to continue to use the Island Site as operational port area</p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<p>and to restrict access in the interests of public safety and port security.</p> <p>ABP's representations on the Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Review Final Draft below are made in this context.</p>
<b>Policy SP1</b>	<p>ABP supports the safeguarding of sites for the uses they for which have been allocated, subject to the recognition that where sites (such as the Island Site) are in existing use and are allocated for alternative use(s), redevelopment will be dependent on commercial viability. Until a satisfactory scheme is agreed with IBC for redevelopment, such sites should reasonably be able to continue in their existing use. In the case of the Island Site, ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.</p>
<b>Policy SP2</b>	<p>ABP supports the allocation of the Island Site as Site IP037 for residential use or residential-led mixed use.</p> <p>The amount and proportion of land appropriate for residential use will be determined through the preparation of a detailed masterplan) and ABP notes and supports the references at paragraphs 4.7 and 4.10 that the figures included in table 1a listed in the Policy are "<i>indicative</i>". ABP will work with IBC to agree a deliverable masterplan for the Island Site which aims to deliver the Council's regeneration objectives subject to commercial viability.</p> <p>In that context, and based on ABP's vision and present thinking, the indicative capacity of 421 homes @ 100 dwellings per hectare stated in the Policy is considered to be high. We consider that the Island Site will deliver a reduced density of approximately 150 units.</p> <p>For the reasons set out in ABP's representations in respect of CS&amp;P DPD Review Final Draft Policy CS20, we do not consider it appropriate for Policy SP2 to refer to the need for "additional vehicular ... access (<i>including emergency access</i>)...to be provided to enable the site's development". This is a matter which should be addressed in the masterplan preparation exercise and we would ask for this reference to be removed.</p> <p>The 'Island Site' presently accommodates successful high profile marine businesses and the commercially successful Ipswich Haven Marina (which has contributed significantly to the regeneration so far of the Waterfront area). ABP is supportive of the redevelopment of the Island subject to its redevelopment being commercially viable and deliverable. Until a satisfactory scheme is agreed with IBC for its redevelopment, however, ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.</p>
<b>Policy SP6</b>	<p>ABP objects to the requirement that the Island Site provides 15% open space which is more than the minimum amount of on-site public open space provision required through Core Strategy Review Policy DM6. Until the completion of the masterplan exercise and the necessary technical assessments accompanying it, it is not appropriate for the DPD to be so prescriptive about the amount of open space to be provided and we would request the removal of reference to it.</p>
<b>Policy SP7</b>	<p>ABP supports the Council's position that the amount of land for leisure or community uses on the Island Site should be determined through masterplanning. Whether there is a need to make provision for early years facilities is a matter best addressed through that masterplanning exercise.</p>

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<b>Policy SP9</b>	<p>ABP objects to the inclusion in the allocation for Site IP037 of the need for “<i>additional vehicular access to the Island Site to enable the site's development</i>”.</p> <p>The extent to which the existing route via St. Peter's Dock can accommodate vehicle access, and any need for additional vehicular access, will depend on the amount of development that can acceptably and viably be accommodated on the Island. This will need to be established through the masterplan exercise referred to on Site Sheet IP037. Until the completion of the masterplan exercise and the necessary technical assessments accompanying it (including transport assessment as referenced on Site Sheet 037), it is not appropriate for the DPD to be so prescriptive about the need for additional vehicular access and we would request the removal of reference to it.</p> <p>Whilst ABP is supportive of the redevelopment of the Island Site (it is one of ABP's 'pathfinder projects'), its delivery is dependent on commercial viability. Until a satisfactory scheme is agreed with IBC for its redevelopment, ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.</p> <p>ABP also objects to the inclusion in the allocation for Site IP037 of the wording that the “<i>development layout should not prejudice future provision of a Wet Dock Crossing</i>”. Whilst ABP remains supportive of IBC's intention to continue to make a case for highway improvements including a Wet Dock Crossing through the Local Transport Plan (see comments on CS&amp;P DPD Review Final Draft Policy CS20), given that there is no formal commitment to this Crossing it is not appropriate for Policies Map iP – One Area Inset to define an alignment of a potential route for a Wet Dock Crossing at this stage and for Policy SP8 to effectively safeguard this alignment. Whilst this may not be the intention of the wording of the Policy and Inset Map, both are capable of interpretation in this way. ABP requests, therefore, appropriate amendment to Policy SP9 and/or Policies Map iP – One Area Inset.</p>
<b>Policy SP11 and para 5.21</b>	ABP supports Policy SP11 and welcomes the recognition at para 5.21 of the need for new development to take account of the Port's operational needs.
<b>Policy SP15</b>	<p>ABP supports the aspiration for a safe cycle and pedestrian access across the lock gates at the entrance to the Wet Dock to create a circular route subject to viability and ensuring Port operations are not compromised.</p> <p>ABP also supports the provision of new foot and cycle bridges across the New Cut linking Stoke Quay to St Peter's Wharf and the Island site to Felaw Street subject to the provision of such bridges being supported by public funding.</p>
<b>Policy SP16</b>	<p>ABP welcomes the intention of IBC to continue to make a case for highway improvements including a Wet Dock Crossing through the Local Transport Plan (see comments on CS&amp;P DPD Review Final Draft Policy CS20). However, in the context of the development of the Island Site (IP037), and as recognised at para 5.42 and at para 8.243 of the CS&amp;P DPD Review Final Draft, provision of a Wet Dock Crossing is not a pre-requisite to enable development of the Island Site.</p> <p>ABP does not agree with inclusion of the statement at para 5.42 that “<i>which as a minimum will require a road bridge from the west bank to the Island Site... to enable any significant development</i>”. We request its removal. The extent to which the existing route via St. Peter's Dock can accommodate vehicle access, and any need for additional road access, will depend on the amount of development that can acceptably and viably be accommodated on the Island. This will need to be established through the masterplan exercise referred to in Final Draft Policy SP2</p>

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>and accompanying Site Sheet IP037. Indeed, based on present thinking that the Island Site will deliver a reduced density of approximately 150 units, additional vehicular access may not be needed.</p> <p>Until the completion of the masterplan exercise and the necessary technical assessments accompanying it (including transport assessment as referenced on Site Sheet 037), it is not appropriate for the DPD to be so prescriptive about the need for a new road bridge and we would request the removal of reference to it.</p> <p>ABP's general support for access improvements in and around the Waterfront and onto the Island Site is conditional upon there being no operational impact on the Port. ABP will continue to work with and assist SCC, IBC and its partners in securing a development solution which addresses all port safety, security and operational issues and avoids any adverse impact on port and marine operations, and which accommodates the existing marina and marine businesses in the future development of the Island Site so that they continue to contribute to an active and appealing waterfront environment for further regeneration.</p>
Para 6.1 Opportunity Area guidance	<p>ABP notes and welcomes the statement that the Opportunity Area descriptions, development principles and plans will act as concept plans to guide the development strategically that is expected to take place, and that they should be adhered to unless evidence submitted with applications indicates that a different approach better delivers the plan objectives. ABP also notes the statement that the allocation policies of the DPD take precedence over the Opportunity Area guidance and site sheets. In that context, ABP notes that there are discrepancies between these respective parts of the DPD which would benefit from clarification.</p> <p>In that context, ABP notes and makes the following comments to references in the text under "Opportunity Area A – Island Site" as follows:</p> <p><b>Under 'Development Opportunities'</b></p> <ul style="list-style-type: none"> <li>• Concern about the amount of green areas including reinstatement of the tree lined promenade required</li> <li>• The old lock gate area is not suitable for leisure uses</li> <li>• Live Work units may not be viable in this location</li> <li>• Office use (other than small scale) is not considered appropriate in this location</li> <li>• The potential for small scale retail / café / restaurants will be subject to viability and market demand</li> <li>• A heritage / culture based visitor attraction is not considered appropriate here</li> <li>• The amount of public open space (see comments to Policy SP6 above)</li> </ul> <p><b>Under 'Development Principles'</b></p> <ul style="list-style-type: none"> <li>• The retention of historic structures may be unviable to retain</li> <li>• Reinterpretation of the historic lock as a focus to new public space may not be compatible with operational and safety requirements</li> <li>• Generally low to medium rise development (3, 4 and 5 storeys)</li> <li>• The requirement for vehicular access (including 73 emergency vehicles) and bridge across New Cut to link to Felaw Street is yet to be established and may not be necessary</li> <li>• What is meant by "<i>prejudice to the potential provision of a full Wet Dock Crossing</i>" needs to be better understood in the context of this being no more than an aspiration</li> <li>• Layout to facilitate location of new foot/cycle bridge from New Cut to St Peter's Wharf (it is not clear what this means)</li> </ul>

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<ul style="list-style-type: none"> <li>• Ensure suitable public transport provision (It is not clear how this is expected to be achieved)</li> </ul> <p>ABP requests correction and clarification of these matters in the guidance.</p>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

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**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

#### **PRIVACY NOTICE**

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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Local Plan Policies Maps Final Draft – Policies Map IP – One Area Inset</b>
<b>Please return this comments form to:</b>	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>		Mr
<b>First name</b>		John
<b>Last name</b>		Bowles
<b>Job title (where relevant)</b>		Director
<b>Organisation (where relevant)</b>	Associated British Ports	Savills
<b>Address (Please include post code)</b>	Ipswich Port	33 Margaret Street London W1G 0JD
<b>E-mail</b>		J n
<b>Telephone No.</b>		1

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Savills on behalf of Associated British Ports ('ABP')
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Please specify which document(s) and document part you are commenting upon.

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Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>ABP is the owner and operator of the Port of Ipswich which is the UK's leading grain exporter and largest of ABP's short-sea ports and which, together with ABP's other East Anglian Ports at Kings Lynn and Lowestoft, contributes some £360m directly into the UK economy every year and supports 3,700 jobs in the region and 5,300 jobs nationally (2019 figures).</p> <p>The Port of Ipswich provides an extensive range of facilities to meet the needs of businesses and industry based in Norfolk and Suffolk. It is the UK's leading grain exporter and largest of ABP's short-sea ports with the ability to handle containers, dry bulks and aggregates, forest products, general cargo and offering extensive roll-on roll-off facilities. The total port area (including water) is approximately 111 ha (275 acres) and the Port handles more than three million tonnes of goods per year. The Port is rail connected and can offer intermodal services from the Port to inland facilities including rail terminals such as ABP's own Hams Hall Railfreight Terminal in the Midlands. The Port is also the base for expanding marina activities.</p> <p>The importance of the Port continuing to flourish as a major economic driver in the sub-region and its 'significant role' in driving further growth in the region through future expansion is recognised in the NALEP Strategic Economic Plan and the adopted Core Strategy.</p> <p>As well as maintaining its operational activities, ABP is concerned to ensure that it retains the right and ability to fully use its land and infrastructure for port purposes in the performance of its statutory duties and responsibilities as a harbour undertaking. Whilst, therefore, ABP is keen to support the realisation of the wider development objectives and aspirations of the Core Strategy and Policies and Site Allocations and Policies DPD Reviews, it must protect its 'significant (economic) role' and ability to expand further and assist in driving growth in the region. New development should be sensitive to these existing uses and avoid potential impacts which may prejudice the continued operation and, where appropriate, expansion of these uses.</p> <p>The 'Island Site', which is identified by Ipswich Borough Council (IBC) and its partners as one of the key regeneration opportunities in central Ipswich, is within ABP's land ownership and presently accommodates successful high profile marine businesses and the commercially successful Ipswich Haven Marina (which has contributed significantly to the regeneration so far of the Waterfront area).</p> <p>ABP is supportive of the redevelopment of the Island Site (it is one of ABP's 'pathfinder projects') subject to its redevelopment being commercially viable and deliverable. ABP's vision for 'Ipswich Island' is that it will be a viable, high quality, sustainable, residential led mixed use development that maximises its waterfront location. The development will be true mixed use, incorporating (alongside homes); boat building, other maritime activities and leisure uses, enhancing connectivity between the site, the Town Centre and the Station as well as around the Waterfront (including via a new circular Maritime Trail).</p> <p>However, until a satisfactory scheme is agreed with IBC for its redevelopment,</p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<p>ABP reserves the right to continue to use the Island Site as operational port area and to restrict access in the interests of public safety and port security.</p> <p>ABP's representations on the Local Plan Policies Maps Final Draft below are made in this context.</p>
<b>Policies Map IP – One Area Inset</b>	<p>For the reasons set out in ABP's representations in respect of CS&amp;P DPD Review Final Draft Policy CS20 and Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Policy SP9, ABP objects to the inclusion on the IP – One Inset Map of a route for the Wet Dock Crossing. Whilst ABP remains supportive of IBC's intention to continue to make a case for highway improvements including a Wet Dock Crossing through the Local Transport Plan (see comments on CS&amp;P DPD Review Final Draft Policy CS20), given that there is no formal commitment to this Crossing it is not appropriate for Policies Map IP – One Area Inset to define an alignment of a potential route for a Wet Dock Crossing at this stage and for Policy SP9 to effectively safeguard this alignment. Whilst this may not be the intention of the wording of the Policy and Inset Map, both are capable of interpretation in this way. ABP requests, therefore, appropriate amendment to Policy SP9 and/or Policies Map IP – One Area Inset.</p>

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

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**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

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**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	<b>Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft</b>
Please return this comments form to:	<p><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</p> <p>Planning Policy Team        Planning and Development        Ipswich Borough Council        Grafton House        15-17 Russell Road        Ipswich        IP1 2DE</p>
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	<p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>

#### PART A PERSONAL DETAILS

	1. Personal details	2. Agent's details (if applicable)
Title	Mr	Miss
First name	Robert	Libby
Last name	Dalziel	Hindle
Job title ( <i>where relevant</i> )		Principle Planner
Organisation ( <i>where relevant</i> )	Austin Street Projects Ltd.	Boyer
Address <i>(Please include post code)</i>	c/o Agent	15 De Grey Square De Grey Road Colchester Essex CO4 5YQ
E-mail	c/o Agent	
Telephone No.		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

<b>Your name or organisation (and client if you are an agent):</b>	Libby Hindle, Boyer on behalf of Austin Street Projects Ltd.
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Please specify which document(s) and document part you are commenting upon.

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Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<b>Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft -</b>  <b>Policy SP2 Land Allocated for Housing: Site Ref: IP309 - Former Bridgewater Social Club, 68a Austin Street</b>	<p><b>Policy SP2 Land Allocated for Housing: Site Ref: IP309 - Former Bridgewater Social Club, 68a Austin Street</b></p> <p>The land at 68a Austin Street lies within the central Ipswich 'IP-One' Area, which is identified within the Local Plan as a principal area to where new development should be directed. The site is located close to the town centre, with accessible links to public transport connections, employment and retail areas, and other key services and amenities.</p> <p>The land at 68a Austin Street was acquired by Austin Street Projects in 2017 after the former social club was forced to close. It is Austin Street Projects' intention to redevelop the site in the next 5 years to deliver a high quality residential development, comprising predominantly of affordable housing. The proposals that are currently being progressed seek to ensure that the site's full residential potential is realised in a deliverable form that accords with the principles of good urban design and in a manner that makes a valuable contribution to addressing the identified local housing need.</p> <p>Austin Street Projects have been keen to work with Ipswich Borough Council in drawing up the proposals, to ensure that the correct approach is taken to balancing the need to maximise development potential of a scarce land resource, whilst respecting the local environment, and contributing to the local housing need.</p> <p>As a vacant previously developed site, the land at 68a Austin Street offers a valuable opportunity to make an immediate contribution to the delivery of housing within the Borough boundary. The redevelopment of the site would make efficient use of an available brownfield and sustainably located site, and would therefore accord with both local and national policy objectives in this regard.</p> <p>We consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF</p>

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

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Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**B**



Planning Policy Team  
Ipswich Borough Council

(sent via e-mail to  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk))

Please ask      Robert Hobbs  
for:  
Email:  
Direct line:  
Our  
reference:  
Your  
reference:

2<sup>nd</sup> March 2020

Dear Sir or Madam

**Regulation 19 consultation on Ipswich Local Plan Review Final Draft (January 2020)**

Thank you for consulting us on your Ipswich Local Plan Review Final Draft (January 2020). Babergh and Mid Suffolk District Councils have considered the Plan and have produced a joint response as attached focusing on key issues.

The Councils are pleased to see the Ipswich Local Plan making provision for housing growth which will contribute to the overall housing market area needs and are committed to cross boundary strategic planning across the Ipswich Strategic Planning Area, which covers the Ipswich Housing Market Area. Furthermore, Babergh and Mid Suffolk District Councils have signed an Ipswich Strategic Planning Area Statement of Common Ground (October 2019 – signed January 2020), with Ipswich Borough Council, East Suffolk Council and Suffolk County Council.

However, there are some areas of concern identified, in particular regarding policies CS2, CS7 and CS11 that the Councils wish to draw attention to. There are also areas of the Plan, that the Councils wish to express support.

Yours faithfully

Robert Hobbs  
Corporate Manager – Strategic Planning



Babergh and Mid Suffolk District Councils  
Endeavour House, 8 Russell Road, Ipswich IP1 2BX  
Telephone: (0300) 1234 000  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

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Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Ipswich Borough Council Local Plan: Core Strategy and Policies Development Plan Document Review – Final Draft (January 2020)</b>
<b>Please return this comments form to:</b>	<b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b>  <b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b>
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#### **PART A PERSONAL DETAILS**

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	Mr	
<b>First name</b>	Robert	
<b>Last name</b>	Hobbs	
<b>Job title (where relevant)</b>	Corporate Manager – Strategic Planning	
<b>Organisation (where relevant)</b>	Babergh and Mid Suffolk District Councils	
<b>Address (Please include post code)</b>	Endeavour House 8 Russell Road Ipswich Suffolk IP1 2BX	
<b>E-mail</b>		
<b>Telephone No.</b>	-	

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Babergh and Mid Suffolk District Councils
--	---

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Core Strategy Policy CS2 and supporting paragraph 8.58	<p><b>Object to soundness of the Local Plan.</b></p> <p>Whilst Babergh and Mid Suffolk District Councils will work with Ipswich Borough Council and East Suffolk Council through the Ipswich Strategic Planning Area (ISPA) Board to address housing need and delivery within the Ipswich Housing Market Area (IHMA), the Councils object to the following statement as unsound:</p> <p><i>'Later in the plan period after 2031, the Council's housing land supply opportunities within the Borough boundary become more limited and, therefore, there will be a need to consider future development opportunities beyond the boundaries with the neighbouring local authorities, in association with the provision of significant infrastructure. Policy CS7 sets out the Borough's objectively assessed housing need.'</i></p> <p>All ISPA authorities in the Statement of Common Ground version 5 (October 2019 – signed January 2020) agree in paragraph C3 of the document that:</p> <p><i>'Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum number it is intending to deliver in its own area. Where, through the production of a Local Plan, it is evident that the need cannot be met within the local authority's boundary, a comprehensive re-assessment of land supply and deliverability will be undertaken'.</i></p> <p>Furthermore, as stated in paragraph C3:</p> <p><i>'Following a comprehensive re-assessment of land supply and deliverability, and where unmet need remains, the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan. An appropriate approach will be dependent upon the scale of unmet need and the current status of other Local Plans in the ISPA.'</i></p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>Therefore, before an assumption is made that later in the plan period, housing land supply opportunities in Ipswich Borough will be limited, a comprehensive regeneration and asset strategy needs to be undertaken to exhaust all other options. For example, there are surface car parks in Ipswich Borough that could be redeveloped for housing or re-configured for multi-storey car parks making a more effective use of land. The emerging Ipswich Local Plan in policy CS5: Improving Accessibility, acknowledges the need to minimise the need to travel and to enable access safely and conveniently on foot, by bicycle and by public transport. Therefore, through measures contained in the Local Transport Plan and the Suffolk County Council Transport Mitigation Strategy, it should be possible to rationalise / make better use of the amount of car parking required in Ipswich.</p> <p>As stated in paragraph 8.96 of the emerging Ipswich Local Plan, '<i>The Local Transport Plan is under review and provides the opportunity for the next package of sustainable travel measures to be identified and implemented.</i>' Furthermore, paragraph 6.22 notes that town centre improvements will encourage modal shift to transport, cycling and walking.</p> <p>Paragraph 8.97 also notes the Council is developing a parking strategy to address the quantity and quality of car parking provision in the town, which we would have expected to have been produced before the assertion was made in paragraph 8.58 of limited housing land supply opportunities.</p> <p>Additionally, a comment was made to the previous Regulation 18 consultation in March 2019 undertaken by Ipswich Borough Council, where Babergh and Mid Suffolk District Councils sought a re-phrasing of paragraph 8.7 to clarify that whilst Ipswich Borough may be under-bounded, the Borough will meet its own identified housing needs with the Borough for this Plan. This paragraph remains unchanged. A similar amendment should be made to policy CS2 to acknowledge that local planning authorities within the Ipswich housing market area will plan to meet the needs of their own areas, which was our comment in March 2019, and which also has not been made. We note paragraph 8.11 does at least acknowledge the starting point for each authority will be to meet their own needs within their own boundary, however we request paragraph 8.7 and policy CS2 are amended accordingly.</p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
Your name or organisation	Babergh and Mid Suffolk District Councils
Core Strategy Policy CS7	<p>Object to soundness of the Local Plan.</p> <p>Policy CS7 states 'In order to boost delivery in Ipswich, the land supply will include a contingency of at least 10% over the housing requirement of 8010 dwellings. This excludes the Opportunity Sites identified through policy SP4.'</p> <p>This statement contradicts the text in paragraph 8.58:</p> <p><i>'Later in the plan period after 2031, the Council's housing land supply opportunities within the Borough boundary become more limited and, therefore, there will be a need to consider future development opportunities beyond the boundaries with the neighbouring local authorities, in association with the provision of significant infrastructure. Policy CS7 sets out the Borough's objectively assessed housing need.'</i></p> <p>Policy CS7 also states following identification of the housing requirement that <i>'The Council will, with its neighbours, keep this figure under review and consider any implications for meeting Ipswich need within the Ipswich Housing Market Area'</i>. Whilst it is correct the Ipswich Housing Market Area authorities discuss the housing requirement for each local planning authority in the IHMA through the ISPA Board, before considering any implications for not being able to meet need, the text in paragraph C3 of the ISPA Statement of Common Ground Version 5 (October 2019 – signed January 2020) needs to be adhered to. The text is quoted below:</p> <p><i>'Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum number it is intending to deliver in its own area. Where, through the production of a Local Plan, it is evident that the need cannot be met within the local authority's boundary, a comprehensive re-assessment of land supply and deliverability will be undertaken'.</i></p> <p><i>'Following a comprehensive re-assessment of land supply and deliverability, and where unmet need remains, the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan. An appropriate approach will be dependent upon the scale of unmet need and the current status of other Local Plans in the ISPA.'</i></p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes If necessary and please ensure your name is included on any additional sheets.)</b>
<b>Core Strategy Paragraph 2.15</b>	<b>Support the spatial strategy for continued urban regeneration in central Ipswich and development of the Ipswich Garden Suburb and land at Humber Doucy Lane.</b>
<b>Core Strategy Policy CS10</b>	<b>Support the delivery of homes at the Ipswich Garden Suburb and associated infrastructure, in particular the 1,200-place secondary school. It is essential that this secondary school is delivered alongside the housing.</b>
<b>Core Strategy Policy CS11 and paragraph 8.141</b>	<p><b>Object to soundness of the Local Plan.</b></p> <p><b>Object to wording in Paragraph 8.141 and Policy CS11.</b></p> <p>Whilst work is being undertaken with neighbouring authorities on short-stay provision within the Ipswich Strategic Planning Area as part of wider work in Suffolk, no contact has been made with Babergh and Mid Suffolk District Councils regarding permanent provision.</p> <p>It is identified that Ipswich Borough Council need to find 27 permanent pitches to 2036. Paragraph C4 of the ISPA Statement of Common Ground Version 5 (October 2019 – signed January 2020) states:</p> <p><i>'Each local planning authority will plan to meet its own need for permanent pitches for Gypsies and Travellers and should have a policy setting out how this will be delivered in its own area. Where the capacity to accommodate pitches cannot be met within the local authority's boundary a comprehensive re-assessment of deliverability will be undertaken and the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.'</i></p>
<b>Core Strategy Policy CS17 and paragraph 8.218.</b>  <b>Core Strategy Paragraph 8.207 supporting Policy CS16</b>	<b>Support the collaborative working on the Recreational disturbance Avoidance and Mitigation Strategy (RAMS), although need to ensure that any RAMS contributions collected are spent to mitigate the impact from the development that has generated the need for the RAMS contribution.</b>

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
<b>Your name or organisation</b>	Babergh and Mid Suffolk District Councils
<b>Core Strategy Paragraph 8.240</b>	<p><b>Object to soundness of the Local Plan.</b></p> <p>In respect of a 'Transport Mitigation Strategy' for the Ipswich Strategic Planning Area, this paragraph states: 'Detailed measures, costings and a mechanism for collecting the contributions from the planned growth will be determined through the ISPA Board'. Additional text needs to be added to also say, '... and to be agreed by each respective local planning authority'.</p>
<b>Core Strategy Paragraphs 8.249 and 8.250</b>	<p><b>Object to soundness of the Local Plan.</b></p> <p>Object to reference to an Ipswich Northern Route as this is no longer supported by Babergh or Mid Suffolk District Councils. However, appreciate that the decision by Suffolk County Council to not pursue funding for an Ipswich Northern Route was made after the emerging Ipswich Local Plan was published for consultation.</p>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

#### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**  Yes

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**  Yes

**Adoption of the Ipswich Local Plan Review.**  Yes

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**From:** Emma GLADWIN .....  
**Sent:** 02 March 2020 20:39  
**To:** PlanningPolicy  
**Cc:** James Firth  
**Subject:** Regulation 19 Consultation - Representations on Behalf of Bloor Homes  
**Attachments:** Ipswich Reg 19 Reps - Bloor Homes, Rushmere.pdf; Ipswich Reg 19 Comment Form - Bloor Homes, Rushmere.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/Madam,

Please find attached representations on behalf of Bloor Homes in relation to the current Regulation 19 consultation for the Ipswich Local Plan Review Final Draft. I would be grateful if you could confirm receipt. Should you have any queries please do not hesitate to contact me.

Kind regards,

**Emma Gladwin**  
BSc (Hons) MSc MRPI  
Senior Planner  
Strutt & Parker, Coval Hall, Rainsford Road, Chelmsford, CM1 2QF  
Office: 01245 258201 |



**Development & Planning**

**STRUTT PARKER**  
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REAL ESTATE

**Creating Sustainable Communities**

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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Core Strategy and Policies Development Plan Document Review &amp; Site Allocations and Policies Development Plan Document Review</b>
<b>Please return this comments form to:</b>	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

#### PART A PERSONAL DETAILS

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
Title		Miss
First name		Emma
Last name		Gladwin
Job title ( <i>where relevant</i> )		Senior Planner
Organisation ( <i>where relevant</i> )	Bloor Homes	Strutt & Parker
Address (Please include post code)		Coval Hall Rainsford Road Chelmsford CM1 2QF
E-mail		
Telephone No.		

## PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation ( <i>and client if you are an agent</i> ):	Bloor Homes c/o Emma Gladwin, Strutt & Parker
--	---

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Policy CS7	We raise concerns over the lack of housing trajectory and no consideration of whether the housing figure should be uplifted to meet economic growth resulting in the Plan being ineffective, not positively prepared and unjustified. For our full representation please refer to the accompanying document.
Policy CS12	We raise concerns about the full affordable need not being met, with no consideration of uplifting the housing figure or allocating additional sites. This is therefore not positively prepared, justified, effective or consistent with national policy. For our full representation please refer to the accompanying document.
Policy CS8	We raise concerns that despite Policy CS8 setting out the types of housing needed, the strategy within the Plan does not seek to meet this need and instead allocates a large proportion of sites for high density smaller flats. This is therefore not positively prepared, justified, effective or consistent with national policy. For our full representation please refer to the accompanying document.
Sustainability Appraisal	The spatial strategy chosen in the Plan is not tested in the Sustainability Appraisal and the scoring provided to some of the options that are tested is not consistent or fully justified. The Sustainability Appraisal contains significant flaws that render the Plan unsound and not currently legally compliant. For our full representation please refer to the accompanying document.

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

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BNP PARIBAS GROUP

# **Ipswich Core Strategy and Policies Development Plan Document Review & Site Allocations and Policies Development Plan Document Review Reg 19 Representations**

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**Humber Doucy Lane, Rushmere St Andrew**

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**Prepared on behalf of Bloor Homes**

**March 2020**

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Humber Doucy Lane, Rushmere St Andrew

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Site Name:	Humber Doucy Lane, Rushmere St Andrew
Client Name:	Bloor Homes
Type of Report:	Ipswich Reg 19 Representations
Prepared by:	Emma Gladwin BSc (Hons) MSc MRTPI Sam Hollingworth MRTPI
Approved by:	Andy Butcher Dip TP MRTPI
Date:	March 2020

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## APPENDICES

- Appendix A    Site Location Plan
- Appendix B    Development Framework Plans
- Appendix C    Suffolk Coastal Hearing Statements on Behalf of Bloor Homes
- Appendix D    Site Allocations Plan
- Appendix E    Highways Technical Note
- Appendix F    Sustainability Appraisal Concerns

## 1.0 Introduction

- 1.1 This representation is submitted by Strutt & Parker on behalf of Bloor Homes to respond to the Regulation 19 consultation on the Ipswich Core Strategy and Policies Development Plan Document Review & Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review (the Local Plan).
- 1.2 Bloor Homes are promoting land at Humber Doucy Lane, Rushmere St Andrew, (the Site) as shown on the Site Location Plan at Appendix A. The land is situated within both the Ipswich Borough and East Suffolk (formerly Suffolk Coastal) District.
- 1.3 The overall Site is approximately 115 hectares in size. It presents both a shorter term opportunity for a smaller scheme and a medium-long term opportunity for a larger scale Garden Village development. Development Framework Plans are included at Appendix B indicating how the Site could be developed.
- 1.4 Representations have been submitted to the Issues and Options stage in 2017 and the Preferred Options stage in 2019.
- 1.5 With a large portion of the Site being in East Suffolk District, representations on behalf of Bloor Homes have also been made to the currently emerging Suffolk Coastal Local Plan, including attendance at Examination. Concerns were raised in relation to the cross boundary approach of working with Ipswich Council and the Site was promoted for a large scale opportunity. The relevant Hearing Statements are included at Appendix C.
- 1.6 In relation to the current consultation, being a Regulation 19 consultation, this representation is made with regard to the tests of soundness which a Local Plan must satisfy as set out at paragraph 35 of the National Planning Policy Framework (NPPF). As set out, we do not consider that the current Local Plan is positively prepared, justified, effective or consistent with national policy.

## **2.0 Housing Need**

- 2.1 The emerging Local Plan sets out that the total housing need under the standard method is at least 8,010 new dwellings between 2018 and 2036. The Local Plan seeks to meet this need and provide 9,500 additional new jobs, as set out in objective 2 of the Local Plan.
- 2.2 Given that the border of Ipswich is drawn very tightly around the developed area, it does present challenges for the Council which are recognised in the emerging Local Plan. Paragraph 8.7 of the emerging Plan sets out that choices about directions for growth at the edge of Ipswich within the Borough boundary are limited, and that a cross boundary approach is the starting point to ensure that development required to meet local needs is provided in a planned and coordinated way, in the right locations, and creates successful places.
- 2.3 We support the recognition within the Plan that the Council will need to work closely with neighbouring authorities regarding future development and infrastructure, as set out in the first strategic objective.
- 2.4 However, as expanded upon below we do not consider that the Council have fully explored all opportunities to work with neighbouring authorities to meet full identified housing needs throughout the Plan period as a whole, as also set out in response to the Suffolk Coastal emerging Local Plan (refer to Appendix C).

### **Policy CS7: The Amount of New Housing Required**

- 2.5 Within Policy CS7, the Council state that the housing requirement will be stepped to reflect when delivery of the Ipswich Garden Suburb is expected to take place.
- 2.6 The Council propose a housing target of 300 dwellings per annum (dpa) for the first six years, increasing to 518 dpa for the remainder of the Plan period, with the majority of this to be delivered through the Ipswich Garden Suburb.
- 2.7 A housing trajectory does not appear to have been published as part of the Local Plan or within the evidence base, so it is unclear whether the approach of the stepped

trajectory is justified or if a greater amount of housing could be delivered in the early part of the Plan period. A housing trajectory is a key part of a Local Plan in identifying if sufficient housing will come forward over the Plan period. It allows the Council, and all other parties, to identify if there are any parts of the Plan period where the delivery of housing might be less than the identified need. Without the trajectory, the rate of delivery simply cannot be known. This is a significant failure of the current Plan and renders it ineffective.

- 2.8 The Site promoted by Bloor Homes can deliver a smaller scale housing development of around 200 homes within the first part of the Plan period, subject to joint working with East Suffolk Council, and could assist in providing a higher level of delivery. Without full consideration of this and working together with the neighbouring authorities to increase delivery, the current approach of the stepped trajectory has not been justified and is unsound.
- 2.9 Furthermore, given the reliance of the Local Plan on the Ipswich Garden Suburb to meet housing need, if it is delayed, housing delivery in Ipswich will be significantly reduced compared to what is currently anticipated. If the stepped trajectory is adopted, this under delivery in the early part of the Plan period will not be rectified for a longer period of time, with housing need continually not being met.
- 2.10 In order for the proposed strategy to be justified and effective, the full housing trajectory should be made available and the Council should consider other opportunities to meet a greater amount of housing need within the early part of the Plan period and reduce reliance on the Ipswich Garden Suburb in the medium and long term.
- 2.11 We would further question the overall housing requirement and whether the Council have adequately considered whether this should be uplifted to support economic growth.
- 2.12 Paragraph 8.168 of the Local Plan sets out the Council have selected an ‘aspirational but deliverable’ jobs target of 9,500 jobs, due to the lower levels of housing growth under the standard method and the reduction in jobs forecast in the 2017 EEFM. This strongly suggests the Council have taken the standard method for housing need as a given without considering any uplift to support economic growth.

2.13 Paragraph 35 of the NPPF is clear that the standard method is a minimum target, which can be increased if desired by the Council. Increasing the housing need to support economic growth is a justified approach, which the Council do not seem have considered. In not considering such an uplift, the Local Plan is not fully positively prepared and may frustrate economic growth.

#### **Policy CS12: Affordable Housing**

- 2.14 The Council recognise early in the Local Plan that affordable housing is a key issue, as set out in Table 2 of the Plan, which identifies that Ipswich has the highest affordable housing need within the Housing Market Area (HMA).
- 2.15 The Strategic Housing Market Assessment (SHMA) 2017 identified a need of 239 affordable dwellings per year. The emerging Local Plan sets out that this represents around 50% of the total need identified through the standard method, with paragraph 8.151 further recognising that development viability is challenging in Ipswich.
- 2.16 To seek to meet this affordable housing need, Policy CS12 seeks ‘at least 15%’ affordable housing provision on sites for 15 houses or more (or sites more than 0.5 ha), and 30% on Ipswich Garden Suburb and at the northern end of Humber Doucy Lane.
- 2.17 However, based on the affordable percentages and housing allocated in the plan, a total of 1,647 affordable dwellings would be provided (assuming 30% on the Garden Suburb and Humber Doucy Lane and 15% on all other sites including windfall). In all likelihood this is overly optimistic given that most windfall sites are likely to be small and fall below the threshold set in Policy CS12, as recognised within Policy CS7.
- 2.18 Based on the need of 239 dwellings per year set out in the SHMA, this would result in 38% of the affordable need having been met over the Plan period.
- 2.19 This does not provide sufficient provision for affordable housing as per paragraph 20 of the NPPF, which specifies that strategic policies should make sufficient provision for housing, including affordable housing.

- 2.20 In addition, contrary to the Planning Practice Guidance (PPG), there does not appear to be any consideration of whether to uplift the housing requirement or seek to provide a greater level of housing to assist in meeting this affordable shortfall. The PPG is clear that ‘an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes’<sup>1</sup>.
- 2.21 As such, the strategy of meeting affordable housing need within the emerging Local Plan is not positively prepared, justified as an appropriate strategy, effective or consistent with national policy.
- 2.22 We consider the Council should have taken the opportunity to consider if any other sites could come forward over the Local Plan period to assist with meeting affordable housing need. The Site at Humber Doucy Lane, as promoted by Bloor Homes, can come forward to provide market and affordable housing.
- 2.23 There is an opportunity for a shorter term smaller scale development of around 200 houses, with a larger scale development in the medium term, with the potential for approximately 1,200 further dwellings. We recognise that with the majority of land being in East Suffolk, there will need to be a cross boundary approach from both Councils to deliver such schemes. We therefore encourage both Councils to work proactively with one another, as also set out in responses to the emerging Suffolk Coastal Local Plan (Appendix C).
- 2.24 Such a development could therefore deliver a significant amount of new market and affordable housing. Whilst the majority of the Site is located within the administrative boundary of East Suffolk Council, Ipswich is very constrained regarding future growth and both Councils should work together to deliver this additional housing to seek to meet more of the affordable housing need arising from Ipswich.
- 2.25 Such an approach would be more consistent with paragraph 26 of the NPPF, which states Council should work together, with particular reference to whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

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<sup>1</sup> Reference ID: 67-008-20190722

### **Policy CS8: Housing Type and Tenure**

- 2.26 Policy CS8 seeks a diverse range of housing tenures to support the creation of mixed and balanced communities. In principle this is in accordance with national policy, with the NPPF being clear from the outset that sustainable development includes 'ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations' (paragraph 8). The PPG also includes a specific section on addressing the need for different types of housing and is clear that the standard method identifies an overall minimum average housing figure, but does not break this down into the needs of different groups.<sup>2</sup> The PPG therefore provides guidance on assessing the housing needs for various different groups.
- 2.27 The supporting text to Policy CS8 sets out that the SHMA identified that the greatest need for market housing is at least 3 bedrooms, with paragraph 8.121 stating that central sites should be high density containing a higher proportion of flats; sites in, or close to, district centres should be medium density with a mix of flats and houses or town houses; and sites elsewhere should be low density with a higher proportion of houses.
- 2.28 Despite Policy CS8 seeking a mix of housing to meet the identified needs, the site allocations identified do not appear to meet this intention, as set out below, contrary to national policy.
- 2.29 The emerging Local Plan seeks to provide allocations for an additional 6,100 homes, based on 1,910 homes already being under construction, with planning permission or a resolution to grant. Of the allocations, 2,750 are to be provided on sites as set out in the Site Allocations and Policies Development Plan Document (DPD).
- 2.30 A review of the allocations within the DPD identifies the total number of dwellings compared to the stated density as follows:

Density	Number of Dwellings	% of Dwellings
High (over 90dph)	1,672	61
Medium (40-90dph)	710	26
Low (below 40dph)	368	13

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<sup>2</sup> Reference ID: 67-001-20190722

- 2.31 As shown above, 61% of dwellings proposed within the DPD are at a high density. As recognised in paragraph 8.121 of the Local Plan, these will be primarily flats. They are likely to be 1 and 2 bedroom flats given the densities proposed and to meet the overall number of houses proposed on these sites. With such a high number and proportion of the dwellings being flats, there is a risk that the market becomes over saturated with smaller flats.
- 2.32 With only 13% of dwellings to be low density and predominantly houses, we question if this will meet the actual housing mix identified in qualitative terms as well as simply meeting the overall need figure.
- 2.33 Whilst Ipswich Garden Suburb and the allocation north of Humber Doucy Lane could deliver more of a mix of houses, these are not expected to start delivering houses until at least 2024. Without sites to provide needed family housing coming forward earlier in the Plan period, there is the potential for an under-delivery of the homes needed which is not positively prepared, justified, effective or consistent with national policy and renders the emerging Local Plan unsound in this regard.
- 2.34 Paragraph 61 of the NPPF is clear that “the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies”. Paragraph 61 gives examples of different groups, including those who require affordable housing, families with children and older people. As set out, the emerging Local Plan is not currently consistent with paragraph 61 of the NPPF as the policies within it do not reflect the type of housing needed for different groups in the community
- 2.35 As set out above, the Site promoted by Bloor Homes at Humber Doucy Lane can deliver housing in the short and medium term subject to joint working between Ipswich and East Suffolk Councils. This can be a mix of housing, including houses with 3 or more bedrooms to meet the identified needs within Ipswich. Allocating the Site for this purpose and committing to working with East Suffolk Council to bring forward the larger part of the Site would assist in overcoming the soundness issue identified as it would seek to meet the identified needs of the area.

### **3.0 The Context for Growth in the Ipswich Strategic Planning Area, and Cross-Boundary Development**

- 3.1 As noted earlier within this representation, given that the administrative boundary of Ipswich Borough constrains the existing town, it is of critical importance that the Local Plan be based on effective joint working with neighbouring authorities.
- 3.2 It is recognised that the four authorities which comprise the wider Ipswich Housing Market Area are progressing joint work through the Ipswich Strategic Planning Area Board (formerly the Ipswich Policy Area) on the strategic cross-boundary issues affecting the four authorities.
- 3.3 This was a matter which was recognised in 2017 in the Inspector's Report on the now adopted Ipswich Local Plan, in which the Inspector stated:

*"Given my concerns about the robustness of the 13550 OAN there is an urgent need for the Council to work with its neighbouring authorities to produce a fit-for-purpose objective assessment of need for new housing for the Ipswich Housing Market Area. This conclusion is consistent with my Interim Findings published in April 2016 following the initial Examination hearings but also has regard to the subsequently-published 2014-based household projections. Thus, and in line with the Memorandum of Understanding detailed in the assessment of the Duty to Cooperate, MM4 - MM6 (policies CS6 and CS7) commit the Council to working with its neighbours to prepare an updated OAN for housing for the HMA as a whole, a strategy for the distribution of it between the constituent districts and the adoption of joint or aligned local plans to deliver this by 2019. These modifications are thus necessary for the soundness of the plan..." (paragraph 28).*

*"However, the Council contends that appropriate, available and deliverable housing sites within Ipswich itself would only deliver 9777 dwellings during the plan period. Whilst with reference to specific sites there is some challenge to this figure, there is nothing to give confidence that substantially more than this number of dwellings can be delivered in the town to 2031. Based on all that I have read and heard, considered in the round and notwithstanding the 2014-based household projection figure, I conclude that it is highly likely that the forthcoming work will identify that the OAN*

*for Ipswich for the period to 2031 is at least equivalent to the 9777 dwellings which the Council contends can be delivered in this period” (paragraph 29).*

- 3.4 The four authorities have prepared a Statement of Common Ground (2018) ('the SoCG') which recognises *inter alia* the potential for cross boundary development to meet needs. Section D of the SoCG (titled 'Consideration of bordering strategic housing development) includes the following statement:

*“Due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich Borough boundary”.*

- 3.5 The Site clearly falls into the category of a potential cross-boundary opportunity (Ipswich Borough and East Suffolk (formerly Suffolk Coastal)) for development.
- 3.6 The Suffolk Coastal Local Plan is very advanced, having undergone examination and with the Examination Inspector having written to the Council on 31<sup>st</sup> January 2020 to confirm that, subject to main modifications identified, the Local Plan was “likely” to be found sound and legally compliant.
- 3.7 The submitted Suffolk Coastal Local Plan Key Diagram identifies an area to the east of Ipswich ('East of Ipswich') as a Major Centre. The Site is clearly commensurate with the East of Ipswich Major Centre.
- 3.8 Policy SCLP3.2 of the submitted Suffolk Coastal Local Plan confirms that Major Centres are at the top of the District's settlement hierarchy and that 'East of Ipswich' includes Kesgrave, Martlesham Heath, Brightwell Lakes, Purdis Farm, and Rushmere St Andrew (excluding village).
- 3.9 Notwithstanding the identification of the East of Ipswich as a Major Centre in the emerging Suffolk Coastal Local Plan, it only allocates one site ('Land at Humber Doucy Lane' (Policy SCLP12.24)) for residential development within this area.

- 3.10 The emerging Suffolk Coastal Local Plan's ability to effectively address Ipswich's housing needs through cross-boundary development was a matter of concern raised through the examination process. In particular, there was concern in respect of Policy SCLP2.1 ('Growth in the Ipswich Strategic Planning Area') and whether this would be effective in ensuring development needs would be sustainably met, where this involved cross-boundary cooperation. In the Examination Inspector's post-hearing letter of 31<sup>st</sup> January 2020, he suggested that Policy SCLP2.1 of the emerging Local Plan should be amended to make clear that an immediate review of the plan would be undertaken in the event that there was an unmet need arising in a neighbouring area, acknowledging the potential for such an issue to arise.
- 3.11 The emerging Ipswich Local Plan aligns with the Suffolk Coastal Local Plan in that both identify the general location of the Site as sustainable for growth. However, when one considers the detailed strategy and allocation of both the emerging Local Plan for Ipswich and that of the Suffolk Coastal Local Plan, it is clear that the plans are not as joined up as they may ostensibly appear.
- 3.12 Appendix D shows the proposed allocations in the emerging Local Plans of Ipswich and Suffolk Coastal in the East of Ipswich area. This suggests a lack of a coordinated approach, with allocations proposed within Ipswich Borough including those which abruptly terminate at the administrative boundary.
- 3.13 We remain concerned that the spatial strategy has been unduly influenced by the administrative boundary, exemplified by the January 2020 Strategic Housing and Economic Land Availability Assessment (SHELAA) having only assessed the element of the Site that lies within Ipswich Borough. A sustainable and deliverable opportunity to facilitate growth of Ipswich through development of the Site has been overlooked and rejected without justification.

#### **4.0 The Site – Land at Humber Doucy Lane**

- 4.1 As set out above, the Site at Humber Doucy Lane is being promoted by Bloor Homes for a residential development.
- 4.2 The Site measures in total approximately 115 ha, but can be divided into two separate areas – one to the south of Lamberts Lane (approximately 13.5 ha) and the other much larger parcel of land to the north. The residential development of the Site could be phased, and the smaller parcel brought forward earlier and independently from the larger parcel, if required. This smaller parcel clearly has strong potential to form an extension to existing residential areas within Ipswich and form an extension to the existing community.
- 4.3 The current allocations to the north east of Ipswich under Policy ISPA4 follow the administrative boundary of Ipswich, which does not follow any distinctive features on the ground. The boundary is purely arbitrary and having development simply follow this does not create a logical pattern of development. It is noted that within the emerging Suffolk Coastal Local Plan, a site is allocated for residential development under Policy SCLP12.24, but this will leave the arbitrary boundary. This is demonstrated on the map in Appendix D.
- 4.4 The Site has the potential to help meet housing needs within a location (East of Ipswich) which has already been tested through the plan-making process (the Suffolk Coastal Local Plan) and found to be a sustainable location for growth, as a more urbanised area. It would form a logical extension to Ipswich, the largest centre in the housing market area, in which there is a substantial range of facilities, services and employment opportunities.
- 4.5 With Ipswich being such a key centre for the Suffolk area, the Council should be ambitious to seek to ensure its long term success. Additional growth can support Ipswich town centre and help its longevity as a prosperous centre.
- 4.6 The Site can deliver approximately 200 homes in the shorter term on land partly within the Ipswich administrative boundary, and can deliver a further approximately 1,200 homes in the medium term on land within the administrative boundary of East Suffolk Council.

- 4.7 As set out in the Highways Technical Note at Appendix E, this level of growth can be delivered via an access from Humber Doucy Lane.
- 4.8 Objective 6 of the emerging Local Plan is to improve transport and connectivity within the Ipswich area. The Ipswich Northern Relief Road has been proposed and explored as one potential option for achieving this, with the proposed inner route partly crossing the land within Bloor Homes' control.
- 4.9 As confirmed in the Highways Technical Note at Appendix E, the development of the Site can be delivered both with and without delivery of the Northern Relief Road. Whilst we understand that Suffolk County Council are not proceeding with the next stage of the business case into the Northern Relief Road, as confirmed at the Cabinet meeting on 25<sup>th</sup> February 2020, should this change in the future, the proposed Site can assist in the delivery of the Road. With Bloor Homes controlling a large part of the land to the north of Humber Doucy Lane, it is uniquely placed to be able to assist in the delivery of a relief road if required in the future.
- 4.10 Further to the above, we note that Policy ISPA2 of the emerging Local Plan (which sets out the Council's strategic infrastructure priorities and a commitment to working with other partners to support and enable the delivery of key strategic infrastructure) states the Council support work to investigate the feasibility of an Ipswich Northern Route, with supporting text 8.19 referring to a strong preference for the inner route, which crosses the site. It sets out that the next review of the Local Plan will consider the implications of any decision about the route in more detail, including the extent to which the options must support potential future housing and employment growth. The principle of such approach is supported, but in order for the policy to be effective, it is important that the spatial strategy helps facilitate such objectives rather than to undermine their delivery.
- 4.11 Development at the Site can deliver new market and affordable homes, alongside new community facilities including local centres, employment and education. Significant areas of new open space and new planting can also be provided.
- 4.12 As set out, a first phase of development can be provided in the short term to assist with the delivery of both market and affordable housing. This is particularly pertinent given that the Council are proposing a stepped trajectory with a lower requirement in the

early part of the Plan period. Allocating the site for development and committing to working with East Suffolk Council would be a positive and proactive approach to seeking to meet housing need in both the short and medium term.

- 4.13 We note that 1.57ha of the site within the boundary of Ipswich Borough was considered in the January 2020 SHELAA, and was found not to be currently developable. It is notable that the Site scored green and amber in relation to the constraints and impacts considered in the SHELAA, with none red. The site was found not to be suitable and achievable due to the need to retain the separate identity of Rushmere village, and if drainage, access and infrastructure constraints could be overcome.
- 4.14 We do not consider this assessment of the Site to provide robust justification for its rejection as a residential development site.
- 4.15 As set out in the Highways Technical Note at Appendix E, suitable access can be achieved from Humber Doucy Lane and it is considered the Site could be developed without having an adverse impact on the wider highway network. As shown on the Indicative Masterplan Framework at Appendix B, the Site can be drained by sustainable drainage methods. The drainage, access and infrastructure constraints mentioned in the SHELAA can be overcome and are not constraints to development.
- 4.16 In terms of the need to retain the separate identity of Rushmere village, open space can be provided within the wider Site to ensure there are no concerns of coalescence. As shown on the Indicative Masterplan Framework, the wider Site can provide significant areas of open space in the form of a community orchard, SuDS ponds, meadow parkland, sports pitches and so on, with significant amounts of new planting. The site can therefore protect the separate identity of Rushmere and ensure there is no coalescence with Ipswich.
- 4.17 We also note that the SHELAA does not consider the wider site promoted by Bloor Homes. Although only 1.57ha of the site lies within the administrative boundary of Ipswich, this is an arbitrary boundary that does not necessarily relate to any demarcations on the ground.
- 4.18 As set out elsewhere in these representations, the Ipswich administrative area is very constrained in terms of its boundary, and with there being a high unmet affordable

housing need and concerns about the housing mix and proposed delivery within the emerging Local Plan, the Council should be looking at all opportunities to provide additional housing.

- 4.19 Given the constraints of the Ipswich boundary, the Council should be looking to neighbouring authorities to assist. Land at Humber Doucy Lane is one such area where there is a sustainable and suitable option for cross boundary development. The Council should therefore have considered this option within the SHELAA to ensure all options have been explored and the approach is positively prepared.
- 4.20 We do not consider the Site has been subject to a robust assessment, and this has resulted in a sustainable option for growth for Ipswich being rejected without justification.

## 5.0 Sustainability Appraisal

- 5.1 The preparation of a Sustainability Appraisal to inform the Local Plan is a legal requirement, as per the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations').
- 5.2 The emerging Local Plan is accompanied by a Sustainability Appraisal ('the SA/SEA'). However, we have concerns with the SE/SEA and the approach to assessing the Spatial Options.
- 5.3 Appendix F sets out our full concerns. In summary, the SA has not considered the spatial strategy actually set out in the Local Plan. An option has been assessed which the Council consider to be close to the spatial strategy chosen, but they are different.
- 5.4 Furthermore, Spatial Option 2 in the SA considers increasing development beyond the Borough boundary. As set out in Appendix E, we have numerous concerns with some of the assessment of Spatial Option 2 and how the scoring has been derived. Overall it appears that Spatial Option 2 has been scored much more poorly than it should have, leading to a worse overall assessment of the option.
- 5.5 It appears that Spatial Option 1, the option most closely aligned with the spatial strategy in the Local Plan, has been scored unjustly positively in some areas, and Spatial Option 2 has been scored more poorly.
- 5.6 A such, the SA prepared alongside the emerging Local Plan does not provide the necessary justification of the proposed spatial strategy.
- 5.7 To rectify this issue of soundness, the SA should be updated to address the above and the Council should subsequently review whether the strategy proposed is suitable and whether the reason for rejecting alternatives is still applicable.

## 6.0 Conclusion

6.1 The Site subject to this representation provides both a shorter term and medium term opportunity for new housing to meet identified needs alongside other infrastructure, open spaces and new planting. Ipswich and East Suffolk Councils should both work positively together to bring such a development forward.

6.2 It is submitted that the Local Plan is not positively prepared, justified, effective or consistent with national policy for the following reasons:

a) The Plan has not been Positively Prepared

The Plan fails to fully address the cross-boundary opportunities for providing sustainable patterns of growth in the Plan period. Such an approach and strategy would clearly be of benefit to both Ipswich and East Suffolk.

With the lack of a housing trajectory having been published, it is unclear whether the Plan does meet identified needs over the Plan period or if there are any times when housing delivery is expected to reduce below the need. The proposed stepped trajectory under Policy CS7 suggests there are concerns with regard to consistently meeting the full housing need.

The proposed strategy does not provide sufficient affordable housing to meet the full identified needs, with there not appearing to be any consideration of whether to uplift the housing target to meet more of this need. This is highlighted within Policy CS12.

b) The Plan is not Justified

Policies CS7, CS12 and CS8 raise concerns in this regard, as the chosen strategy does not seek to provide sufficient affordable housing or the housing that is needed within Ipswich, i.e. 3-bed houses rather than 1-bed flats. Concerns are also raised in relation to the SA, as set out in full in Appendix E, which does not appear to appropriately assess the Spatial Options presented.

c) The Plan is not Effective

As set out, we do not consider that the Local Plan is effective in working with neighbouring authorities on cross boundary opportunities to deliver sufficient housing of the type and tenure to meet the identified needs.

d) The Plan is not Consistent with National Policy

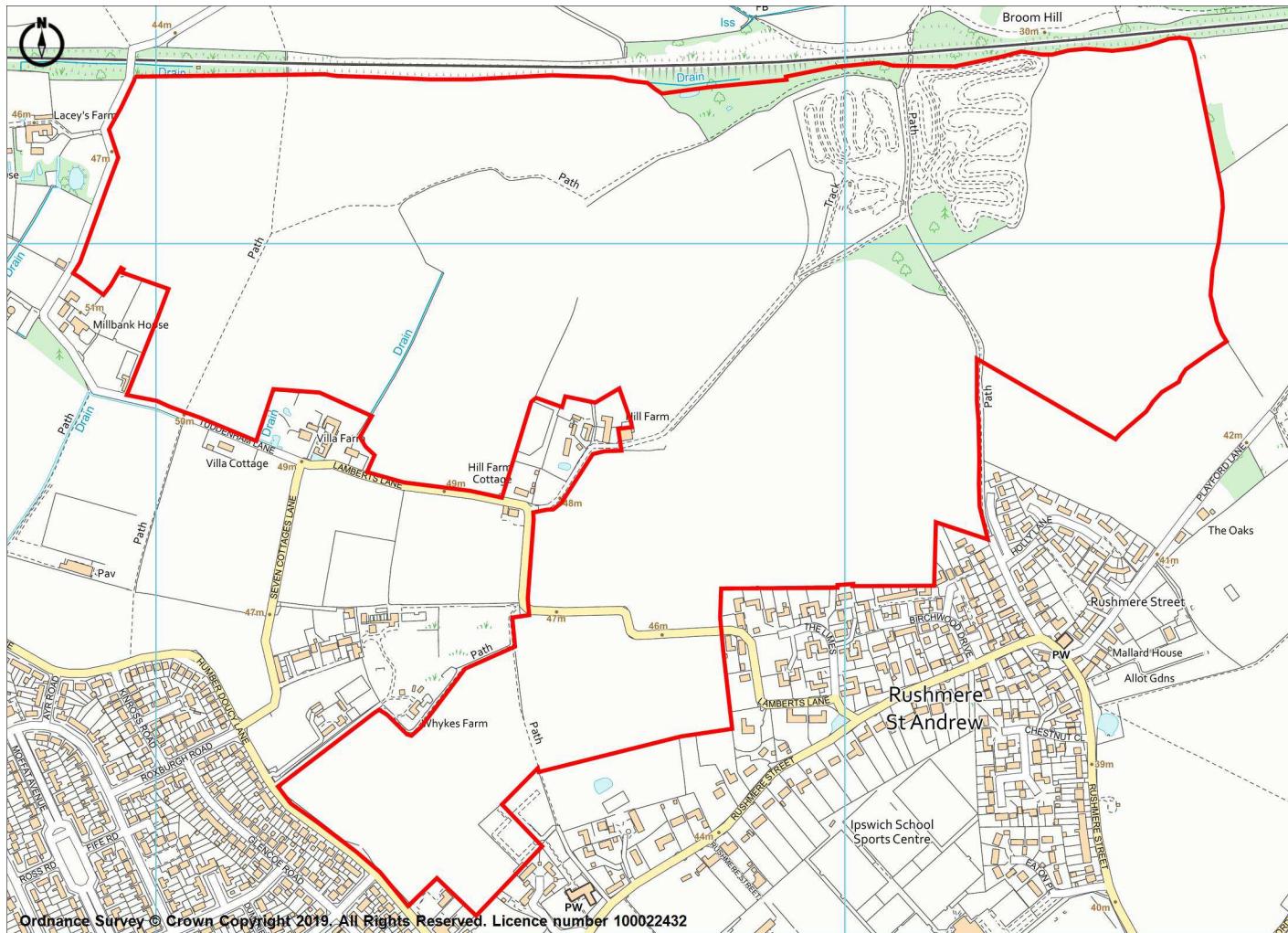
Given the failures of the Plan to provide the type of housing that people within the Borough need, provide sufficient affordable housing and adequately work with neighbouring authorities, it is not fully consistent with national policy.

- 6.3 We consider that the Council should take the opportunity to work with East Suffolk Council to identify and deliver a cross boundary development to provide housing to meet identified needs across the Plan period. At the minimum, the Council should include a commitment to an early review of the Plan if unmet needs are identified.

## **Appendices**

## **Appendix A**

## Site Location Plan - Rushmere St. Andrews, Humber Doucy Lane



Ordnance Survey © Crown Copyright 2019. All Rights Reserved.  
Licence number 100022432  
Plotted Scale - 1:10000. Paper Size - A4



## **Appendix B**



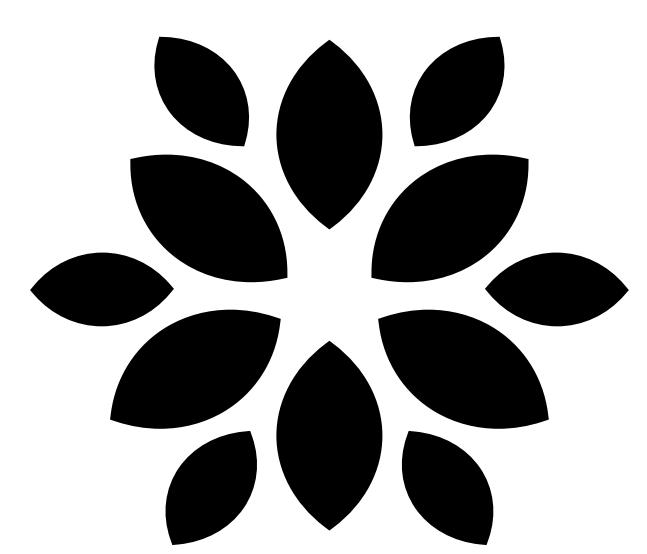
N  
Considerations

- Red line
- Railway
- A - Road
- B - Road
- Minor road
- Track on site

- Public Right of Way
- Downward slope
- Noise pollution
- Required junction improvement
- Required road improvement
- Potential cycle lane
- Local authority boundary

- Contours (5M)
- Priority habitat - deciduous woodland
- Rushmere MX track
- Listed building
- Orchard

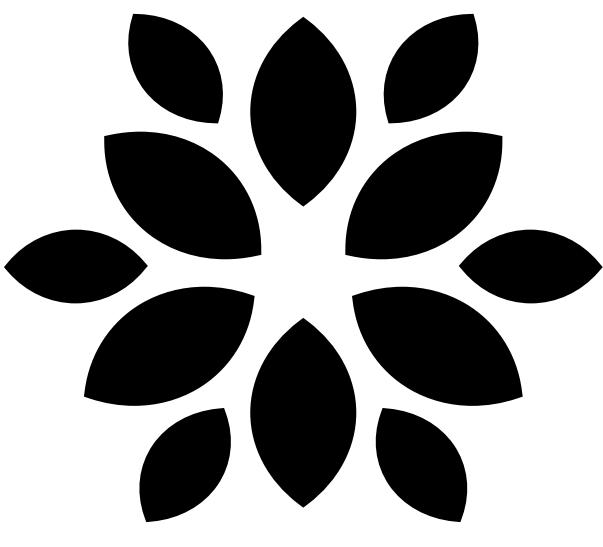
### LAND AT HUMBER DOUCY LANE



**BLOOR HOMES**

**MOSAIC**  
Urban Design & Masterplanning

**mode**



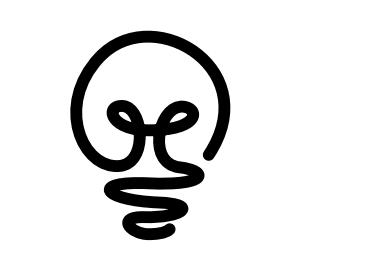
2-2,500 new homes at 35dph



New community facilities including 3-4 local centres



4-5 primary school forms of entry and a secondary school



Employment



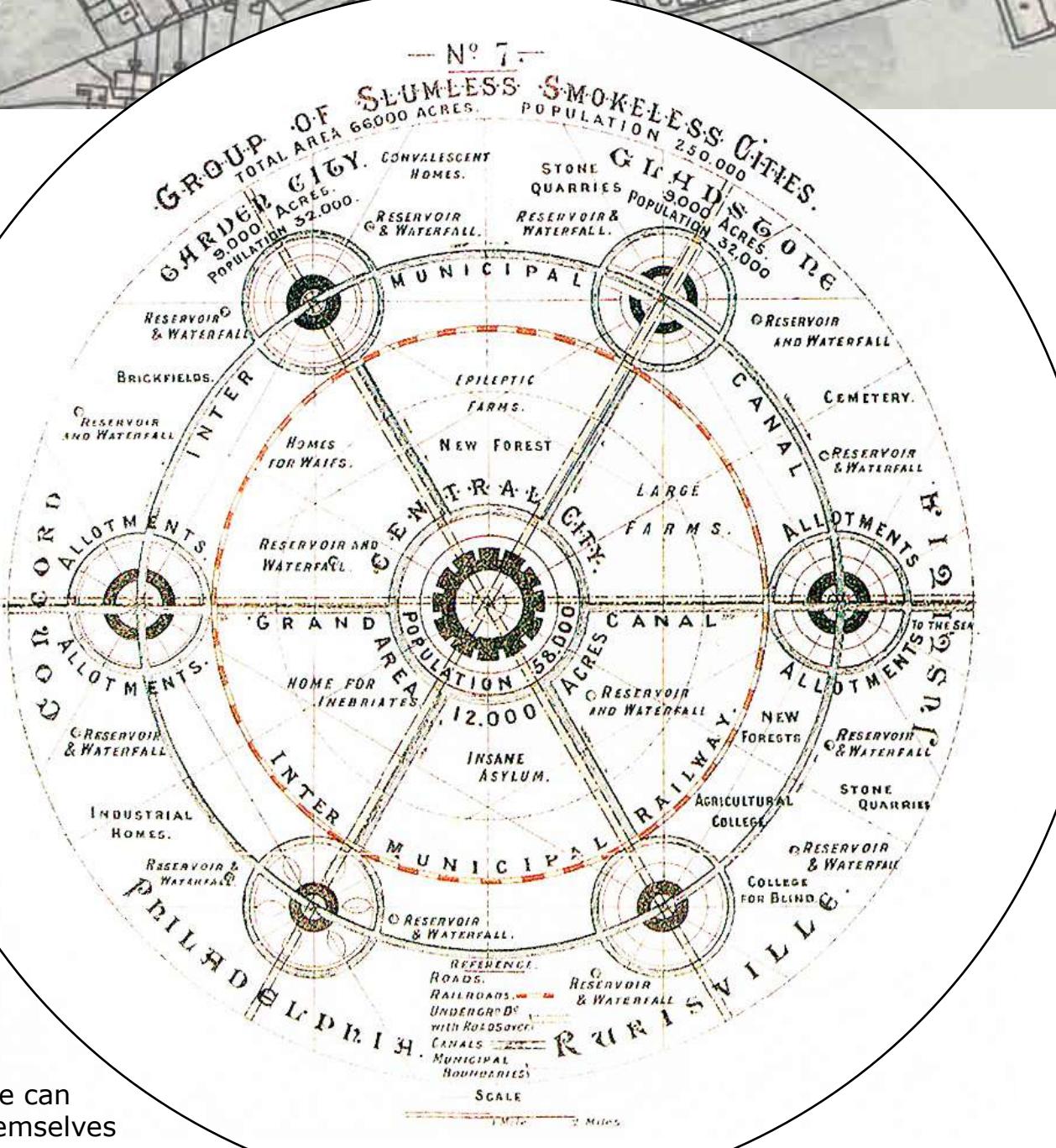
## OPPORTUNITY

### A Garden Community

The revised National Planning Policy Framework was published on 24 July 2018 and sets out the government's planning policies for England and how these are expected to be applied.

The National Planning Policy Framework (NPPF) recommends Local Authorities plan for larger scale development (new settlements or extensions) following the principles of Garden Cities. In response to the Government's Garden communities' prospectus we intend to submit the Land at Humber Doucy Lane for consideration.

The Land at Humber Doucy Lane will not be a dormitory community, or a place which just uses 'garden' as a convenient label. We will set clear expectations for the quality of the development and how this can be maintained. We want to see a vibrant, mixed-use, community where people can live, work, and play for generations to come – a community which views themselves as the conservation areas of the future. The Land at Humber Doucy Lane will be holistically planned, self-sustaining, and characterful.



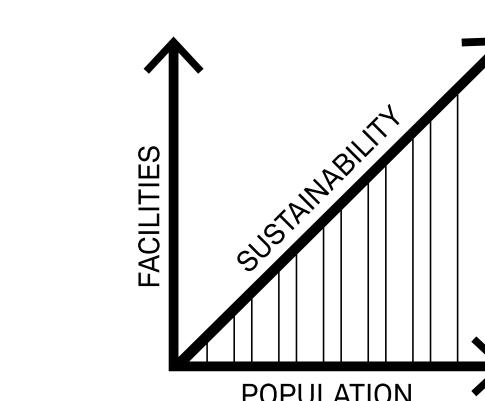
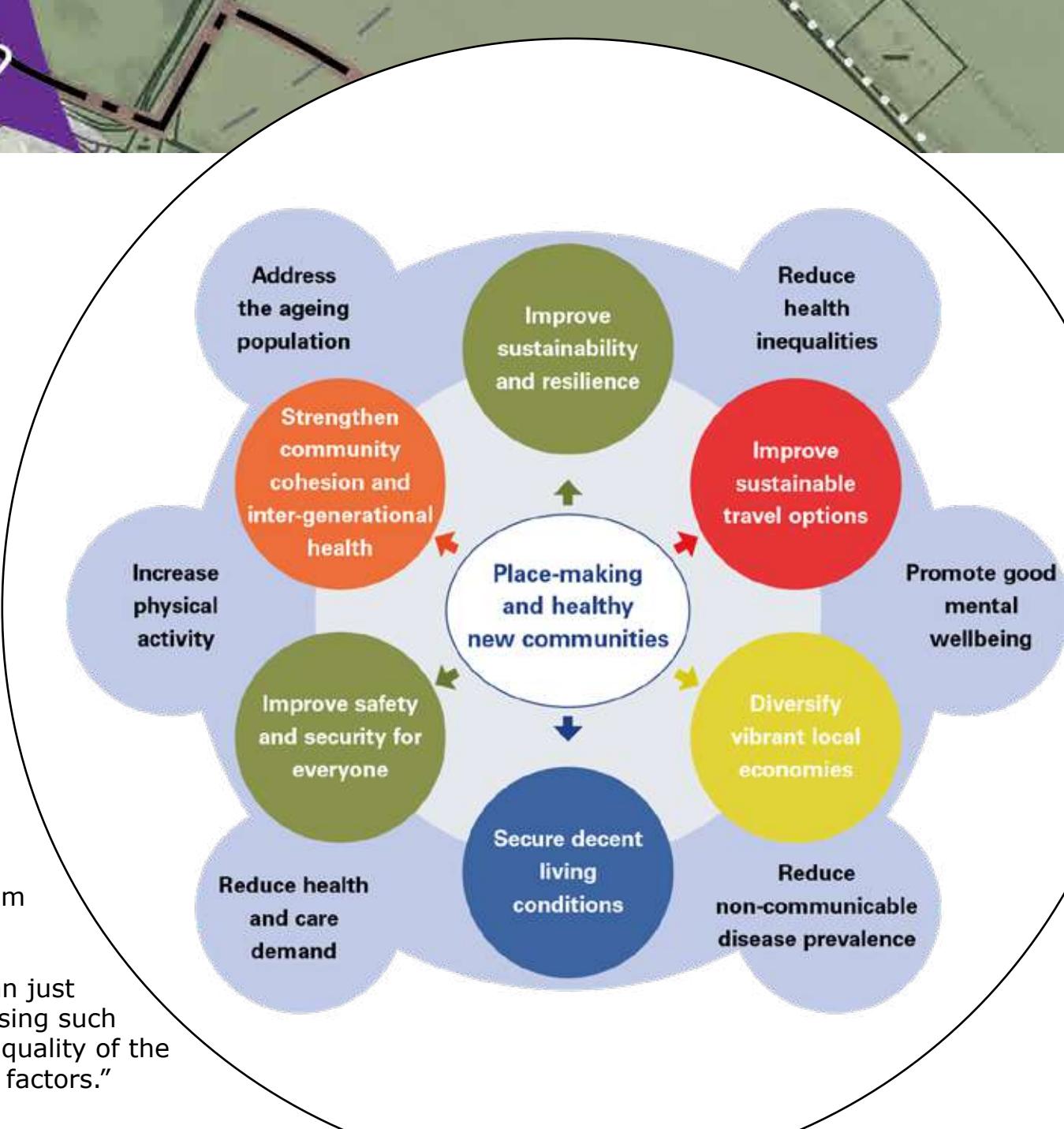
### A Healthy Community

The NPPF states planning policies and decisions should aim to achieve healthy, inclusive and safe places.

"When taking a place-based approach, healthy developments will not only help the local authority to improve population health in terms of both physical and mental wellbeing, but will also help in achieving multiple local objectives and priorities within the wider place-making agenda, such as improving road safety, reducing air pollution, maximising environmental protection, or securing infrastructure investment to attract new residents and a skilled working population. Meeting these wider objectives can result in attracting the right workforce to work in the health and care system and in other local industries."

All this makes creating a high-quality living environment more than just a matter of addressing issues that adversely affect health. Addressing such multiple local priorities can also help to promote good health: the quality of the environment and the local socioeconomic context are contributing factors."

Source: TCPA, 2017, guide 8 creating health promoting environments.

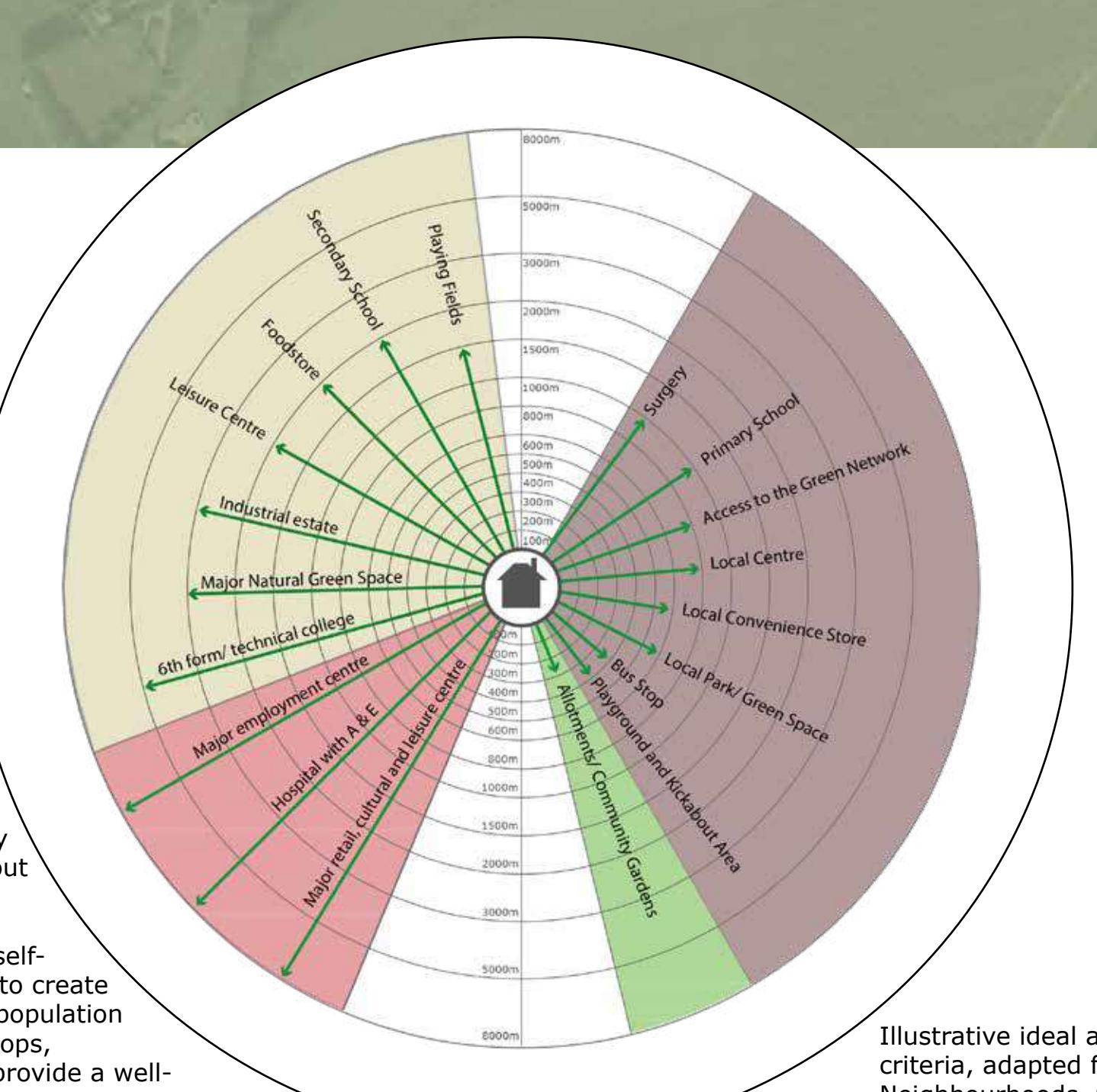


### A Complete Community

Access to local facilities is fundamental to the concept of locating sustainable development.

New development needs the full range of social, retail, educational, health, transport and recreational facilities to allow people, especially those of limited means or mobility, to go about their daily lives without over reliance on a private car.

If well planned, the Land at Humber Doucy Lane, Ipswich, can be a self-sustaining community. The scale of the site presents an opportunity to create a new healthy garden community of approximately 5,000 people. A population of this order is enough to trigger a full range of facilities including shops, employment, leisure and education on-site to support daily life and provide a well-rounded community that meet the needs of its citizens, and neighbouring communities, over their lifetime.



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Illustrative ideal accessibility criteria, adapted from 'Shaping Neighbourhoods, for Local Health and Global Sustainability'.

22.08.2018 / Scale: 1:2,500 @ A0

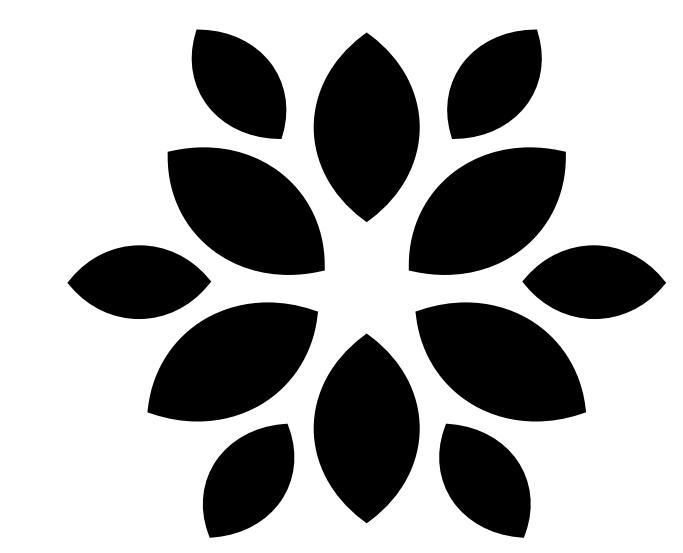


N  
◆  
Phase One  
Indicative Masterplan Framework

- Red line
- Public Right of Way
- Local authority boundary

- |     |                   |     |                     |      |                     |
|-----|-------------------|-----|---------------------|------|---------------------|
| (1) | Site access       | (4) | SUDS Pond           | (7)  | Structural planting |
| (2) | Public footpath   | (5) | Neighbourhood green | (8)  | Meadow parkland     |
| (3) | Community orchard | (6) | Mixed-use           | (9)  | Active sports       |
|     |                   |     |                     | (10) | Emergency access    |

LAND AT  
HUMBER  
DOUCY LANE



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## **Appendix C**



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**SUFFOLK COASTAL LOCAL PLAN  
EXAMINATION HEARING STATEMENT  
FOR HEARING SESSION ON 20 AUGUST 2019**

**MATTER 2A – HOUSING PROVISION**

**Prepared by Strutt & Parker on behalf of Bloor Homes Eastern  
July 2019**

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Site Name:	Land North of Humber Doucy Lane and South of Lamberts Lane, Rushmere St Andrew, Ipswich
Client Name:	Bloor Homes Eastern
Type of Report:	Hearing Statement – Matter 2A
Prepared by:	Derek Stebbing BA(Hons) DiP EP MRTPI
Approved by:	Andrew Butcher Dip TP. MRTPI
Date:	31 <sup>st</sup> July 2019

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## Matter 2A – Housing Provision

### 1.0 Introduction

- 1.1 Strutt & Parker are instructed by Bloor Homes Eastern to submit this Hearing Statement to the Examination for the Suffolk Coastal Local Plan (2018-2036). Previous submissions on behalf of our clients have been made to the Suffolk Coastal District Council (now part of East Suffolk Council) throughout the emerging Local Plan process.
- 1.2 Bloor Homes Eastern are promoting the residential allocation of the land to the north east of Humber Doucy Lane and Lamberts Lane, Rushmere St Andrew, Ipswich. The land was referenced by the Council as Sites 1087 and 1145 in earlier Local Plan Consultation documents and was assessed in the Initial Sustainability Appraisal. A Location Plan outlining the site and Draft Masterplan accompanies this representation.
- 1.3 The overall site is approximately 115 hectares in size and comprises two potential residential development allocations, the first being the short-term delivery comprising of 13.5 hectares of land north east of Humber Doucy Lane; and the second comprising the remaining land, which lies to the north east of Lamberts Lane. This is being promoted as a medium-term opportunity by Bloor Homes for a Garden Village development. These opportunities respond to the identified role of the Local Plan in addressing the strategic objectives for the area.
- 1.4 This Hearing Statement is concerned with Matter 2A of the Examination Hearing programme, and specifically addresses Point 2.4 of the Inspector's questions for Matter 2A.

## 2.0 Point 2.4 Does Policy SCLP2.1 serve a clear purpose and would it be effective?

2.1 Policy SCLP2.1 states as follows :-

### ***Policy SCLP2.1: Growth in the Ipswich Strategic Planning Area***

*Suffolk Coastal will continue to play a key role in the economic growth of the Ipswich Strategic Planning Area, whilst enhancing quality of life and protecting the high quality environments. Over the period 2018-2036, the Suffolk Coastal Local Plan will contribute to:*

- a) *The creation of at least 30,320 jobs through the provision of at least 49.8ha of employment land across the Ipswich Functional Economic Area;*
- b) *The collective delivery of at least 37,328 dwellings across the Ipswich Housing Market Area; and*
- c) *Supporting the continued role of Ipswich as County Town.*

*The Council will work actively with the other local planning authorities in the ISPA and with Suffolk County Council to co-ordinate the delivery of development and in monitoring and reviewing evidence as necessary.*

2.2 The four authorities of Ipswich Borough Council, Suffolk Coastal District Council, Mid-Suffolk District Council and Babergh District Council are presently progressing joint work through the Ipswich Strategic Planning Area Board (formerly the Ipswich Policy Area) on the strategic cross-boundary issues affecting the four authorities. In particular, with specific relevance to our client's interests, the authorities (following the Inspector's report in 2017 on the Examination of the now adopted Ipswich Local Plan) are working together in order to meet the housing need for the Ipswich Housing Market Area and agree the strategic distribution of development to meet that need.

2.3 In 2017 the Ipswich Local Plan Inspector reported as follows:

*"28. Given my concerns about the robustness of the 13550 OAN there is an urgent need for the Council to work with its neighbouring authorities to produce a fit-for-purpose objective assessment of need for new housing for the Ipswich Housing Market Area. This conclusion is consistent with my Interim Findings published in April 2016 following the initial Examination hearings but also has regard to the subsequently-*

*published 2014-based household projections. Thus, and in line with the Memorandum of Understanding detailed in the assessment of the Duty to Co-operate, MM4 - MM6 (policies CS6 and CS7) commit the Council to working with its neighbours to prepare an updated OAN for housing for the HMA as a whole, a strategy for the distribution of it between the constituent districts and the adoption of joint or aligned local plans to deliver this by 2019.”*

and

*29. However, the Council contends that appropriate, available and deliverable housing sites within Ipswich itself would only deliver 9777 dwellings during the plan period. Whilst with reference to specific sites there is some challenge to this figure, there is nothing to give confidence that substantially more than this number of dwellings can be delivered in the town to 2031. Based on all that I have read and heard, considered in the round and notwithstanding the 2014-based household projection figure, I conclude that it is highly likely that the forthcoming work will identify that the OAN for Ipswich for the period to 2031 is at least equivalent to the 9777 dwellings which the Council contends can be delivered in this period”*

- 2.4 The authorities have prepared a Statement of Common Ground (SoCG) (v4 March 2019) to address the strategic cross-boundary planning matters in the Ipswich Strategic Planning Area. Key extracts from that document regarding the approach to the delivery of the housing requirement are set out below:

***“Process of reaching outcomes and agreements***

*The Ipswich Strategic Planning Area Board provides a mechanism to discuss the authorities’ approach to housing requirements and to inform and guide the approach to be taken within each Local Plan.*

*C1) The housing need calculated under the standard methodology will form the starting point for identifying housing requirements. The Suffolk Coastal First Draft Local Plan, published for consultation between July and September 2018, was based upon the need figures published by MHCLG in September 2017 under the ‘Planning for the Right Homes in the Right Places’ consultation. The NPPF was published in July 2018 and the Planning Practice Guidance updated in September 2018. The 2017 ratios of median workplace earnings to median house prices were published in April 2018 and the 2016-based household projections were published in September 2018. The Planning Practice Guidance has subsequently been updated in February 2019 to state that the 2014-based household projections should be used in*

*the calculation. Local housing need as calculated under the standard method will form the starting point in identifying housing requirements.*

*C2) The standard method will, therefore, also provide the starting point for identifying the total amount of housing to be provided in the Ipswich Housing Market Area.*

*C3) Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum housing number it is intending to deliver in its own area. Where the need cannot be met within the local authority's boundary, following a comprehensive re-assessment of deliverability the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.*

*C4) Provision for Gypsies and Travellers – the 2017 Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment identified a need for additional pitches to be provided for Babergh, Mid Suffolk, Ipswich and Suffolk Coastal. Each local planning authority will plan to meet its own need for permanent pitches for Gypsies and Travellers and should have a policy setting out how this will be delivered in its own area. Where the capacity to accommodate pitches cannot be met within the local authority's boundary a comprehensive re-assessment of deliverability will be undertaken and the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.*

*C5) Mix and type of housing: The Authorities published an update to Part 2 of the Strategic Housing Market Assessment in January 2019. This updates the size, type and tenure of housing needed, including the need for affordable housing, based upon the housing need calculated under the standard method.*

C6) Strategic policies in emerging Local Plans are to reflect the outcomes above.

#### **D. Consideration of bordering strategic housing developments**

##### Background

*Due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich Borough boundary.*

##### Evidence

*The Councils have jointly commissioned transport modelling (with Suffolk County Council). The Methodology Report and the Results Report Volume 1: Suffolk Coastal and Ipswich were published in August 2018 as part of the consultation on the Suffolk Coastal First Draft Local Plan. Further transport modelling of preferred options has been undertaken and the Results Report Volume 2: Suffolk Coastal and Ipswich and an updated Methodology Report were published in January 2019. The Councils jointly commissioned a Settlement Sensitivity Assessment in relation to identifying landscape sensitivity around Ipswich. The Strategic Housing and Employment Land Availability Assessments identify sites which border or cross authority boundaries.*

##### Process of reaching outcomes and agreements

*The conclusions of the above evidence have been, and will continue to be, considered in site selection and in identifying any necessary mitigation.*

### Outcomes and agreements

*Land north east of Humber Doucy Lane is identified as a cross-border location for future development (within Ipswich Borough and Suffolk Coastal District) for housing delivery post 2031. This joint approach will help enable land within Ipswich Borough to come forward for housing. The relevant policies in Local Plans are:*

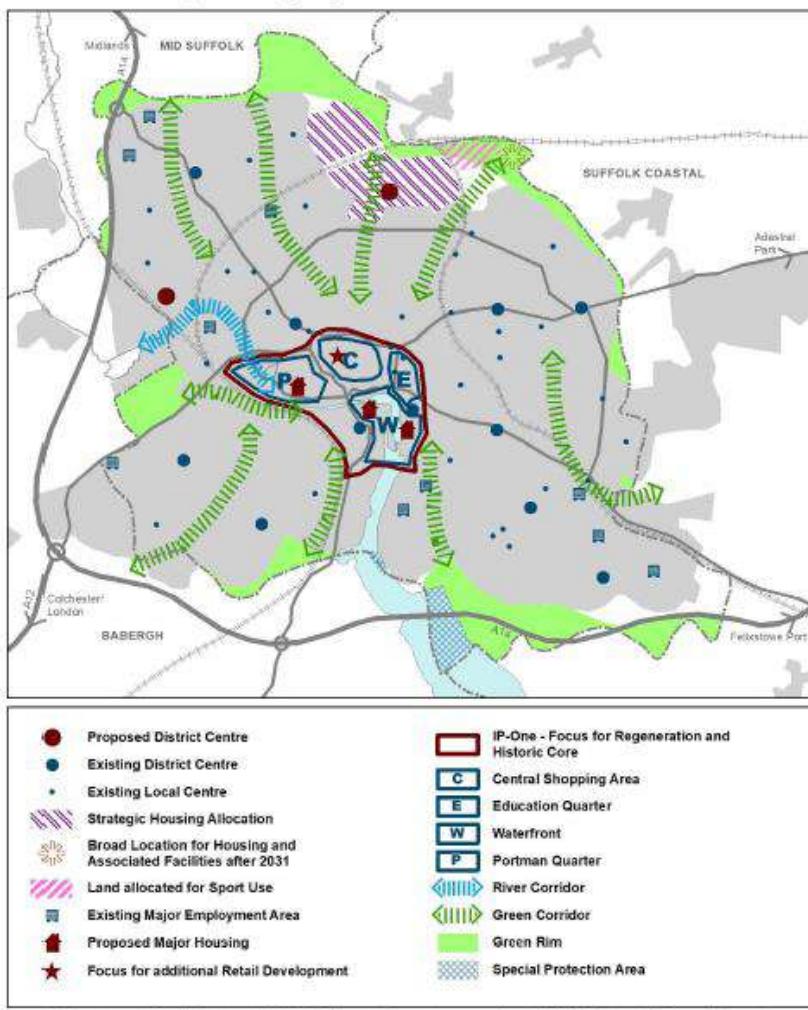
- *Ipswich Core Strategy and Policies DPD Review Preferred Options (November 2018), Policy ISPA4 ‘Cross Boundary Working to Deliver Sites’*
- *Suffolk Coastal Final Draft Local Plan (January 2019), Policy SCLP12.24 ‘Land at Humber Doucy Lane, Rushmere St Andrew’*

- 2.5 The key points arising from this strategic cross-boundary co-operation are that the four authorities are presently planning to meet a housing need of 37,278 dwellings up to 2036. Secondly, the SoCG recognises that “due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich borough boundary”.
- 2.6 However, Policy SCLP2.1 as presently drafted fails to provide sufficiently clear and effective strategic policy guidance on the nature of the Plan’s “close functional relationship” with Ipswich Borough. In fact, Section 2 of the Plan entitled “Wider Strategic Planning Area”, containing Policy SCLP2.1, is generally not explicit on the potential strategic cross-boundary issues that will clearly affect both the Suffolk Coastal Local Plan and the emerging Ipswich Local Plan during the respective Plan periods. We give detailed consideration to Policy SCLP12.24 (Land at Humber Doucy Lane) in our Hearing Statement for Matter 3 (Communities surrounding Ipswich). However it should be noted at this point that Policy SCLP12.24 is not set in the context of meeting strategic, long-term cross-boundary objectives. In fact, it was an addition to the Plan’s housing allocations introduced into the Plan at a relatively late stage.
- 2.7 As we understand the position, there is presently no intention by the Suffolk authorities to prepare a statutory or non-statutory Spatial Development Strategy for the Ipswich

Strategic Planning Area. It will therefore fall to the individual Local Plans prepared by the constituent authorities to take forward the strategic policy issues identified by the Ipswich Strategic Planning Area Board.

- 2.8 In our submission, the Suffolk Coastal Local Plan does not yet address such issues with sufficient clarity, particularly as they will affect the later years of the Plan period. It is clear from the Preferred Options consultation of the emerging Ipswich Local Plan that the Borough Council foresee a long-term strategic direction of growth to the north-east of the existing Ipswich urban area. This is identified on the Key Diagram accompanying that consultation, as below :

DIAGRAM 3: The Ipswich Key Diagram



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- 2.9 We would suggest that this long-term approach, which clearly indicates the proposed “direction of travel” for the growth of Ipswich, and which has obvious cross-boundary implications with the strategy of the Suffolk Coastal Local Plan, should be reflected with greater clarity in that Plan, and specifically within Policy SCLP2.1.

- 2.10 Furthermore, the recent publication for consultation of three potential routes for the Ipswich Northern Route (the link between the A12 and A14) reinforces the need for the Plan to set out in greater detail the strategic planning context for that link road, which is described in the Factual Note prepared by the Council on 25 July 2019.
- 2.11 Our client's land has key significance for the potential delivery of the Option C route, which is the southernmost and shortest route option. Whilst we clearly support that route option, it is not yet possible to pre-judge the outcome of the ongoing consultation. Nevertheless, we firmly consider that the Plan does need to contain a much clearer and fuller position statement by East Suffolk Council on the strategic planning implications of the proposed Link Road. In our assessment, it clearly recognises and endorses the long-term approach to the future growth of Ipswich, as being indicated in the emerging Ipswich Local Plan, which should be recognised in this Plan.

### **3. Conclusion and Proposed Change to Submission Local Plan**

- 3.1 In the context of the long-term strategic cross-boundary planning matters being addressed by the Ipswich Strategic Planning Area Board, and described above, we do not consider that Policy SCLP2.1 is effective. It presently fails to address cross-boundary matters with sufficient clarity. Specifically, it does not recognise the "direction of travel" for the growth of Ipswich post-2031, being identified in the emerging Ipswich Local Plan, nor the strategic implications of the proposed Ipswich Northern Route, in so far as it will directly support new homes and employment growth.
- 3.2 We consider that the Policy should be modified to reflect the content of the Factual Note published on 25 July 2019, together with a fuller position statement by the Council on its strategic planning objectives for the delivery of the Link Road and the spatial implications for future growth in the Ipswich/Suffolk Coastal Local Plan areas. It is absolutely clear that these are significant cross-boundary matters which should be addressed in the respective Local Plans. We therefore request that the Inspector recommends that such modification be made to the Plan in order to address these points.



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**SUFFOLK COASTAL LOCAL PLAN**

**EXAMINATION HEARING STATEMENT**

**FOR HEARING SESSION ON 21 AUGUST 2019**

**MATTER 2C – DISTRIBUTION OF GROWTH AND THE SETTLEMENT HIERARCHY**

**Prepared by Strutt & Parker on behalf of Bloor Homes Eastern**

**July 2019**

---

Site Name:	Land North of Humber Doucy Lane and South of Lamberts Lane, Rushmere St Andrew, Ipswich
Client Name:	Bloor Homes Eastern
Type of Report:	Hearing Statement – Matter 2C
Prepared by:	Derek Stebbing BA(Hons) Dip EP MRTPI
Approved by:	Andrew Butcher Dip TP. MRTPI
Date:	31 <sup>st</sup> July 2019

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## Matter 2C – Distribution of Growth and the Settlement Hierarchy

### 1.0 Introduction

- 1.1 Strutt & Parker are instructed by Bloor Homes Eastern to submit this Hearing Statement to the Examination for the Suffolk Coastal Local Plan (2018-2036). Previous submissions on behalf of our clients have been made to the Suffolk Coastal District Council (now part of East Suffolk Council) throughout the emerging Local Plan process.
- 1.2 Bloor Homes Eastern are promoting the residential allocation of the land to the north east of Humber Doucy Lane and Lamberts Lane, Rushmere St Andrew, Ipswich. The land was referenced by the Council as Sites 1087 and 1145 in earlier Local Plan Consultation documents and was assessed in the Initial Sustainability Appraisal. A Location Plan outlining the site and Draft Masterplan accompanies our Hearing Statement for Matter 2A.
- 1.3 The overall site is approximately 115 hectares in size and comprises two potential residential development allocations, the first being the short-term delivery comprising of 13.5 hectares of land north east of Humber Doucy Lane; and the second comprising the remaining land which lies to the north east of Lamberts Lane. This is being promoted by Bloor Homes as a medium-term opportunity for a Garden Village development. These opportunities respond to the identified role of the Local Plan in addressing the strategic objectives for the area.
- 1.4 This Hearing Statement is concerned with Matter 2C of the Examination Hearing programme, and specifically addresses Points 2.17 and 2.18 of the Inspector's questions for Matter 2C.

**2.0 Point 2.17 - Is the strategy for growth set out in Policy SCLP3.1 justified and would it be effective in delivering sustainable development?**

2.1 Policy SCLP3.1 states as follows :-

***Policy SCLP3.1: Strategy for Growth in Suffolk Coastal District***

*The Council will deliver an ambitious plan for growth over the period 2018 – 2036 in Suffolk Coastal by:*

- a) *Supporting and facilitating economic growth through the supply of significantly more than the baseline requirement of 11.7ha of land for employment uses to deliver at least 6,500 jobs and to enable the key economic activities to maintain and enhance their role within the UK economy;*
- b) *Sustain and support growth in retail, commercial leisure and town centres including facilitating provision towards plan period forecasts of between 4,100 - 5,000 sq m of convenience retail floorspace and between 7,700 – 13,100 sqm of comparison retail floorspace;*
- c) *Significantly boosting the supply of housing, the mix of housing available and the provision of affordable housing, through the delivery of at least 582 new dwellings per annum (at least 10,476 over the period 2018 - 2036);*
- d) *Ensuring the provision of infrastructure needed to support growth;*
- e) *Protecting and enhancing the quality of the historic, built and natural environment across the District.*

*The strategy for growth will seek to provide opportunities for economic growth and create and enhance sustainable and inclusive communities through:*

- f) *The delivery of new Garden Neighbourhoods at North Felixstowe and South Saxmundham;*

- g) Utilising opportunities provided by road and rail corridors, including a focus on growth in the A12 and the A14 corridors;*
- h) New strategic employment allocations based around key transport corridors, including to support the Port of Felixstowe;*
- i) Strategies for market towns which seek to reflect and strengthen their roles and economies;*
- j) Appropriate growth in rural areas that will help to support and sustain existing communities.*

- 2.2 This Hearing Statement supports our client's case that the Submission Draft Plan pays insufficient regard to the strategic context of meeting the full housing need up to 2036 across the Ipswich Strategic Planning Area, the potential need for Ipswich Borough Council to consider sites beyond its administrative boundaries as part of strategic cross-boundary distribution of housing growth (as reflected in Agreement C3 of the submitted Statement of Common Ground (v4 March 2019) and the fact that part of our client's site falls within the Ipswich Borough Council administrative area.
- 2.3 Policy SCLP3.1 sets out the plan for growth across the district throughout the Plan period, identifying targets and forecasts for delivery across key sectors with a significant boost planned for housing supply. The policy sets a target of delivering at least 10,476 new dwellings throughout the Plan period with the delivery mechanism largely focused on two new garden Neighbourhoods at North Felixstowe and South Saxmundham.
- 2.4 However, the policy and its supporting justification (paragraphs 3.27-3.35) fails to make any specific reference at all to the "East of Ipswich Major Centre" as defined in the Plan's settlement hierarchy (within Policy SCLP3.2). There is no indication that the area is a part of the "Spatial Strategy for Growth" through to 2036 or indeed part of any ongoing strategic cross-boundary considerations with Ipswich Borough Council.
- 2.5 The thrust of our concerns regarding Policy SCLP2.1 is therefore also equally applicable to Policy SCLP3.1, in that the policy fails to recognise the Plan's stated "close functional relationship" with Ipswich Borough.

2.6 Policy SCLP3.1 is therefore defective through its failure to recognise and address the strategic cross-boundary issues arising from the Plan's strategy for growth over the period 2018-2036, and its further failure to take account of the "East of Ipswich Major Centre", either as part of those cross-boundary considerations or as part of the Plan's growth strategy. The policy is effectively silent on these matters. Furthermore, the policy does not reflect the outcomes and agreements set out in the submitted SoCG, notably the statement that "*The Ipswich Strategic Planning Area Board provides a mechanism to discuss the authorities' approach to housing requirements and to inform and guide the approach to be taken within each Local Plan*". It is clear that the Submission Draft Plan was largely prepared in advance of these considerations, at least in as far as addressing the cross-boundary implications of meeting housing need in both Ipswich and Suffolk Coastal Districts are concerned, with the small allocation set out at Policy SCLP12.24 being added at a late stage in the Plan's preparation and without fuller consideration of other potential development opportunities in the North East Ipswich area, which include our client's site.

### **3.0 Point 2.18 - Is the identification of settlements set out in the Settlement Hierarchy in Policy SCLP3.2 justified?**

- 3.1 Rushmere St. Andrew (excluding the village) is defined within Policy SCLP3.2 as constituting part of the "East of Ipswich Major Centre" within the policy's settlement hierarchy. The policy notes that "*The Settlement Hierarchy enables the Council to achieve its vision for the District, meeting the scale of development required and enhancing the quality of the built, natural, historic, social and cultural environments whilst sustaining the vitality of communities*", and also that "*The development requirements for Major Centres, Market Towns, Large Villages and Small Villages will be delivered through site allocations in the Local Plan or in Neighbourhood Plans, plus through windfall development in accordance with other policies in this Local Plan*".
- 3.2 The summary of the various policy approaches to the Settlement Hierarchy set out in Table 3.4 indicates that the only projected housing growth for the "East of Ipswich Major Centre" will be through development at Brightwell Lakes, at the Suffolk Police HQ site at Martlesham Heath and by development within settlement boundaries. It

is noteworthy that the proposed allocation in Policy SCLP12.24 is not listed within Table 3.4, inferring that it is in fact not being considered as part of the planned approach for housing development in the East of Ipswich Major Centre, as also discussed at paragraph 2.6 above. This is indicative of the Plan's disjointed approach towards addressing the strategic planning opportunities in that Major Centre.

- 3.3 As set out in our Hearing Statement for Matter 2A, we consider that the Suffolk Coastal Local Plan does not yet address strategic cross-boundary issues with Ipswich Borough with sufficient clarity, particularly as they will affect the later years of the Plan period. The emerging Ipswich Local Plan identifies a long-term strategic direction of growth to the north-east of the existing Ipswich urban area, which is not reflected in the Suffolk Coastal Local Plan. Such a planned direction of growth by Ipswich Borough Council is adjacent to the Plan's "East of Ipswich Major Centre" and potentially a part of that Major Centre, at least for the period post-2031.
- 3.4 The Plan's only statement, at paragraph 3.34, that "*In future Local Plan revisions, the Council will reconsider growth opportunities in the parts of the District neighbouring Ipswich, taking into account delivery rates at Brightwell Lakes and opportunity to bring forward development that supports the Business Case for strategic road routes to the north of Ipswich (as promoted by Suffolk County Council)*" is an inadequate and uncertain policy position, bearing in mind that the Plan is presently seeking to address growth requirements up to 2036, and that the Ipswich Northern Route could be delivered from 2027 onwards.

#### **4.0 Conclusion and Proposed Change to Submission Local Plan**

- 4.1 This Hearing Statement, specifically addressing Policies SCLP3.1 and SCLP 3.2, should be considered in the context of our client's broader case that the Plan presently fails to address the strategic cross-boundary matters being considered by the Ipswich Strategic Planning Area Board. We do not consider that Policy SCLP3.1 presently addresses such matters with sufficient clarity) and it specifically does not recognise the potential growth requirements of Ipswich Borough post-2031 and any potential requirements for further development in the "East of Ipswich Major Centre", as defined in Policy SCLP3.2 and amplified in Table 3.4.
- 4.2 We consider that Policy SCLP3.1, and its supporting justification, should be modified to provide a clear policy direction to the statement that is presently confined to paragraph 3.34 in the Plan, and that the "East of Ipswich Major Centre" will be expected to accommodate further growth in the later phases of this Plan period, together with supporting infrastructure such as the planned Ipswich Northern Route.



BNP PARIBAS GROUP 

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**SUFFOLK COASTAL LOCAL PLAN**  
**EXAMINATION HEARING STATEMENT**  
**FOR HEARING SESSION ON 4 SEPTEMBER 2019**  
**MATTER 3 – AREA SPECIFIC STRATEGIES – DEVELOPMENT ALLOCATIONS**

**Prepared by Strutt & Parker on behalf of Bloor Homes Eastern**  
**July 2019**

---

Site Name:	Land North of Humber Doucy Lane and South of Lamberts Lane, Rushmere St Andrew, Ipswich
Client Name:	Bloor Homes Eastern
Type of Report:	Hearing Statement – Matter 3
Prepared by:	Derek Stebbing BA(Hons) DiP EP MRTPI
Approved by:	Andrew Butcher Dip TP. MRTPI
Date:	31 <sup>st</sup> July 2019

## Suffolk Coastal Local Plan Examination

### Matter 3 – Area Specific Strategies – Development Allocations

#### 1.0 Introduction

- 1.1 Strutt & Parker are instructed by Bloor Homes Eastern to submit this Hearing Statement to the Examination for the Suffolk Coastal Local Plan (2018-2036). Previous submissions on behalf of our clients have been made to the Suffolk Coastal District Council (now part of East Suffolk Council) throughout the emerging Local Plan process.
- 1.2 Bloor Homes Eastern are promoting the residential allocation of the land to the north east of Humber Doucy Lane and Lamberts Lane, Rushmere St Andrew, Ipswich. The land was referenced by the Council as Sites 1087 and 1145 in earlier Local Plan Consultation documents and was assessed in the Initial Sustainability Appraisal. A Location Plan outlining the site and Draft Masterplan accompanied our Hearing Statement for Matter 2A. The site lies to the east of the proposed allocation of land at Humber Doucy Lane in the Plan at Policy SCLP12.24, which is the subject of this Hearing Statement.
- 1.3 The overall site is approximately 115 hectares in size and comprises two potential residential development allocations, the first being the short-term delivery comprising of 13.5 hectares of land north east of Humber Doucy Lane; and the second comprising the remaining land which lies to the north east of Lamberts Lane. This is being promoted by Bloor Homes as a medium-term opportunity for a Garden Village development. These opportunities respond to the identified role of the Local Plan in addressing the strategic objectives for the area.
- 1.4 This Hearing Statement is concerned with Matter 3 of the Examination Hearing programme, and specifically addresses Point 3.27 of the Inspector's questions for Matter 3.

## 2.0 Matter 3 – Communities Surrounding Ipswich

**Point 3.27 - What is the justification for the allocation of land at Humber Doucy Lane coming forward beyond 2031? Is Policy SCLP12.24 developable within the plan period?**

2.1 Policy SCLP12.24 states as follows:-

**Policy SCLP12.24: Land at Humber Doucy Lane**

*9.9ha of land to the east of Humber Doucy Lane is identified to come forward for the development of approximately 150 dwellings post 2031. Development will come forward as part of a master planned approach with land in Ipswich Borough.*

*Development will be expected to comply with the following criteria:*

- a) *Delivery of a high quality design incorporating a mix of housing types, including affordable housing on-site;*
- b) *A site-specific Flood Risk Assessment will be required;*
- c) *Provision of 0.1ha of land for an early years setting if needed within the part of the site in Suffolk Coastal District;*
- d) *Contribution to the creation of a ‘green rim’ around Ipswich and provision of on-site open space;*
- e) *Provision of a soft edge to the urban area through the provision of significant landscaping;*
- f) *Promotion of the use of sustainable modes of transport; and*
- g) *An archaeological assessment will be required.*

*Development will be accessed via Humber Doucy Lane. A Transport Assessment will be required to identify any necessary improvements to highways and junctions on Humber Doucy Lane and Tuddenham Road.*

2.2 This Hearing Statement further supports our client's case that the Submission Draft Plan pays insufficient regard to the strategic context of meeting the full housing need up to 2036 across the Ipswich Strategic Planning Area, the potential need for Ipswich Borough Council to consider sites beyond its administrative boundaries as part of strategic cross-boundary distribution of housing growth (as reflected in Agreement C3 of the submitted Statement of Common Ground (v4 March 2019) and the fact that a part of our client's site falls within the Ipswich Borough Council administrative area. It should be read alongside our Hearing Statements for Matters 2A and 2C.

2.3 Policy SCLP12.24 was introduced into the Plan at a late stage, shortly before its final consultation and Submission for Examination. It has clearly been introduced because the proposals for the Ipswich Garden Suburb straddle the administrative boundary between Ipswich and East Suffolk. Indeed, this confirmed by paragraph 12.215 which states that “*The site is identified to come forward post 2031 to enable the delivery of the Ipswich Garden Suburb to become well established and for*

*infrastructure such as the primary school associated with the Ipswich Garden Suburb to be delivered.”*

2.4 This approach is piecemeal and disjointed. As noted in our Hearing Statement for Matter 2C the proposed allocation is not identified within Table 3.4 of the Plan as an element of the growth proposals for the “East of Ipswich Major Centre”, nor is it identified at any other point in the Plan as being within that Major Centre. Nevertheless, it is quite clearly part of a strategic development proposal (Ipswich Garden Suburb) to meet part of Ipswich’s growth requirements.

2.5 Our concerns regarding Policies SCLP2.1 and SCLP3.1 are equally applicable to Policy SCLP12.24, in that this policy also fails to demonstrate the Plan’s stated “close functional relationship” with Ipswich Borough.

2.6 It is our submission that, if Policy SCLP12.24 is to be justified, it should be set quite clearly in the context of being one element of the strategic cross-boundary issues (between Ipswich and East Suffolk) arising from the Plan’s strategy for growth over the period 2018-2036; in this case for the period post-2031. It should be further identified as being part of the “East of Ipswich Major Centre”.

2.7 As we have stated in our Hearing Statement for Matter 2A, the Plan should contain clearer policy guidance (within Policy SCLP2.1) on the strategic cross-boundary matters that will clearly affect the area to the north-east of Ipswich. These include the proposed “direction of travel” for the growth of Ipswich post-2031 and the proposed Ipswich Northern Route. It is clear that the Submission Draft Plan was largely prepared in advance of these considerations, and the relatively late addition into the Plan of Policy SCLP12.24 demonstrates that it has been reactive rather than proactive.

2.8 Policy SCLP12.24 is therefore just one small part of a much bigger strategic picture, and we consider that, as a minimum, the Plan should signal that land to the north-west of Rushmere St. Andrew may come forward for development in later years of the Plan period in order to address the wider strategic growth requirements of the Ipswich Strategic Planning Area.

2.9 The Plan's present stated approach (at paragraph 3.34) of intending to reconsider growth opportunities in the parts of the District neighbouring Ipswich in future revisions of the Local Plan is inadequate, if the Plan is expected to provide clear strategic policies for the whole of the Plan period, namely 2018-2036.

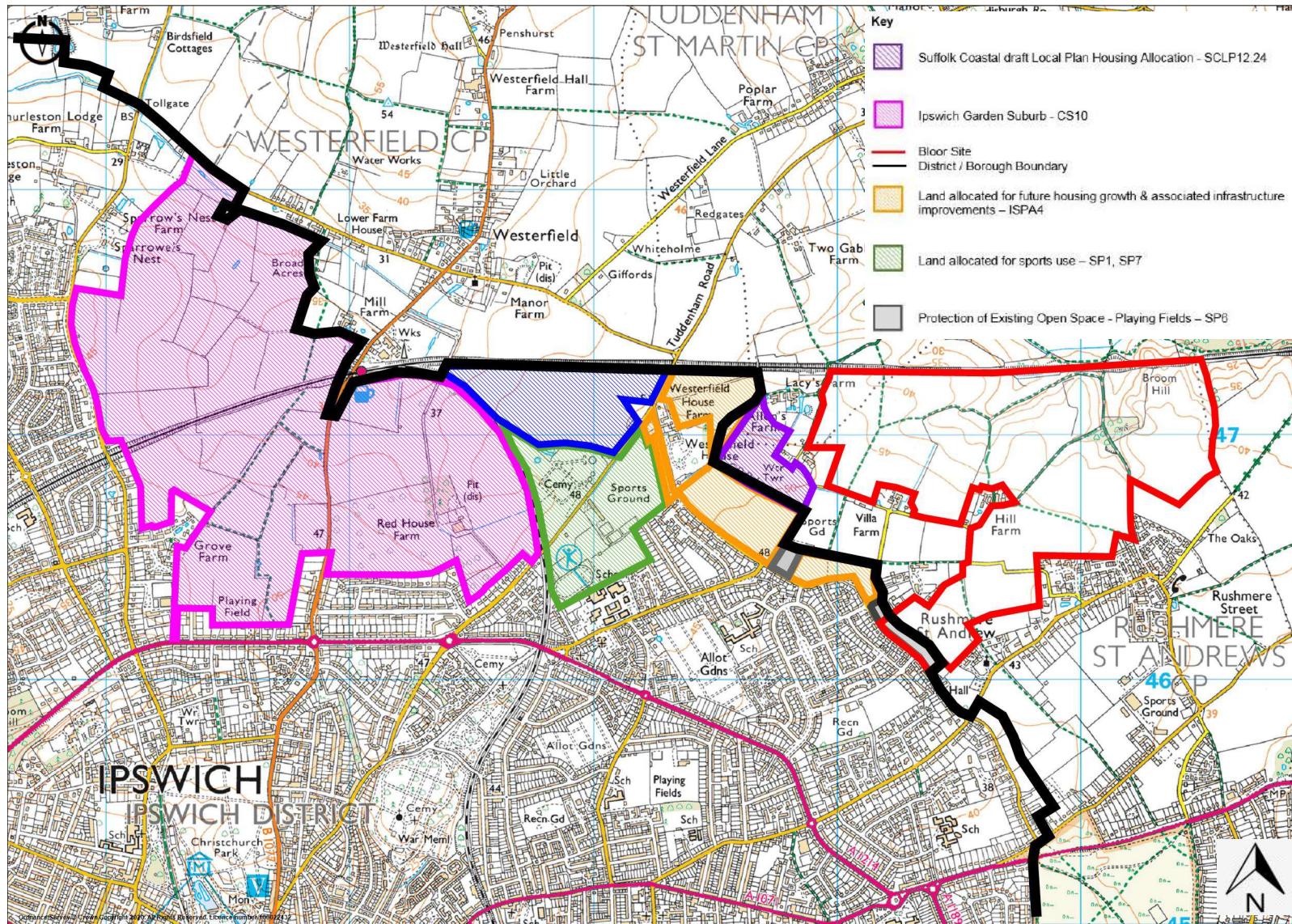
### **3. Conclusion and Proposed Change to Submission Local Plan**

3.1 This Hearing Statement, specifically addressing Policy SCLP12.24 should be considered in the context of our client's broader case that the Plan presently fails to address the strategic cross-boundary matters being considered by the Ipswich Strategic Planning Area Board. We do not consider that Policy SCLP12.24 and its supporting justification, as presently drafted, provides sufficient clarity or certainty on those matters, despite the fact that it is quite clearly proposed to be an element of meeting the potential growth requirements of Ipswich Borough post-2031.

3.2 Furthermore, Policy SCLP12.24 and its supporting justification, should be set within the context of contributing to the Plan's proposed distribution of growth to the "East of Ipswich Major Centre" and that further land, to the north-west of Rushmere St Andrew, may come forward for development in later years of the Plan period in order to address the wider strategic growth requirements of the Ipswich Strategic Planning Area, including the proposed Ipswich Northern Route.

## **Appendix D**

## Bloor Homes - Rushmere St Andrew - Site Allocations Plan



## **Appendix E**



mode  
transport planning

Bloor Homes

# Land at Humber Doucy Lane, Rushmere St Andrew

## Phase 1 Transport Feasibility Study

March 2020



Bloor Homes

# Land at Humber Doucy Lane, Rushmere St Andrew

## Phase 1 Transport Feasibility Study

OFFICE ADDRESS:

Hawley Wharf  
1 Water Lane  
London  
NW1 8NZ

PROJECT NO:

J324587

DATE:

March 2020

REPORT NO.

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SD

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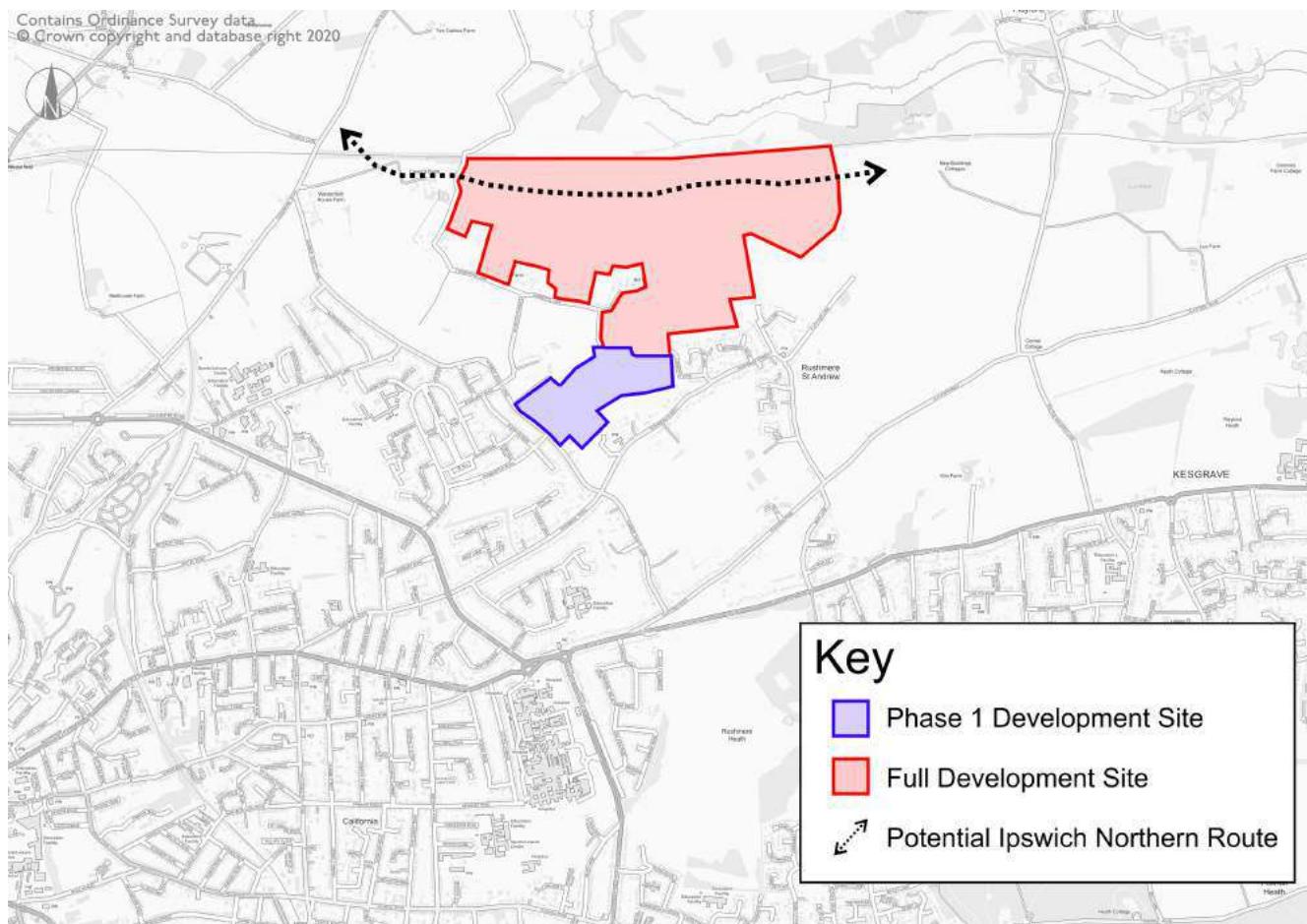
## APPENDIX A - SITE ACCESS MODELLING RESULTS

# 1 Introduction

## 1.1 Overview

- 1.1.1 mode transport planning (mode) have been commissioned by Bloor Homes to provide highways and transport advice for a residential development at land to the northeast of Humber Doucy Lane, approximately 3km from Ipswich Town Centre. The initial land parcel of the development is envisaged to provide circa 200 dwellings, which could act as a possible gateway for a further 1,200 dwellings and a future link to the potential Ipswich Northern Route (Inner Route). Whilst we understand that Suffolk County Council are not proceeding with the next stage of the business case into the Northern Relief Road, as confirmed at the Cabinet meeting on 25th February 2020, should this change in the future, the proposed Site can assist in the delivery of the Road. With Bloor Homes controlling a large part of the land to the north of Humber Doucy Lane, it is uniquely placed to be able to assist in the delivery of a relief road if required in the future. For the purposes of this report, the initial parcel of land is referred to as Phase 1.
- 1.1.2 **Figure 1.1** identifies the location of both Phase 1 and the wider site, as well as the indicative alignment of the Ipswich Northern Route (Inner Route).

Figure 1.1: Site Location

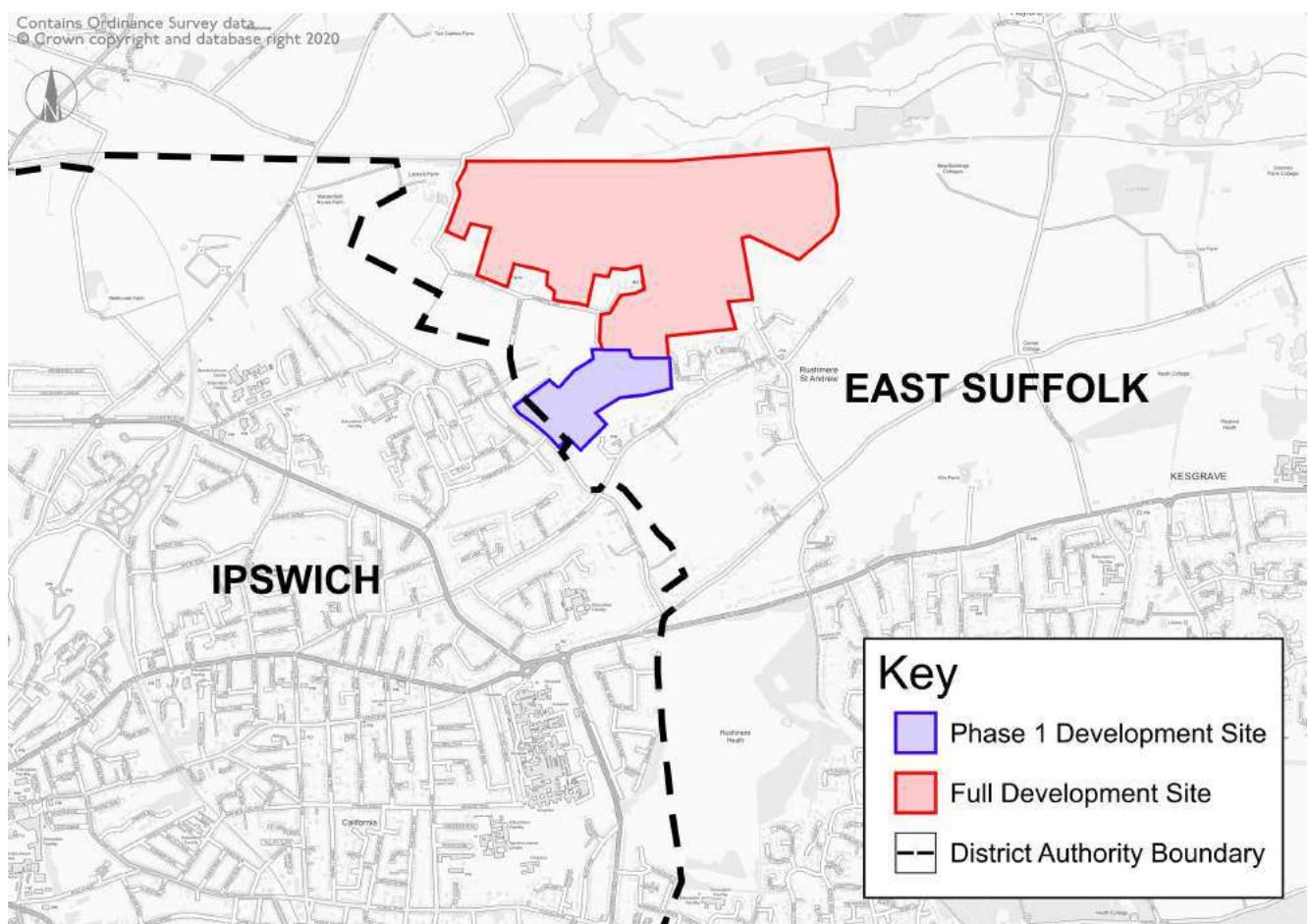


- 1.1.3 Phase 1 of the site is located on land immediately to the northeast of Humber Doucy Lane, extending from Rushmere Village Hall in the south to Tuddenham Lane in the north. The wider site encompasses a number of agricultural land parcels with areas of woodland and hedges bordering some of the fields. It is anticipated that initially this will be accessed via the Phase 1 development.
- 1.1.4 The consultation of the Ipswich Northern Route involves three key route options (outer, middle and inner) which offer links between the A14 and A12 in order to alleviate traffic routing through Ipswich and the Orwell Crossing to the south of the town.
- 1.1.5 The inner route option for the Ipswich Northern Route has the potential to route through the wider development area offering connection between the site to the A14 and the A12 to the west and east respectively.
- 1.1.6 Access to the Phase 1 site is currently proposed off Humber Doucy Lane via an existing agricultural access located approximately 40m north of Dumbarton Road, which will be widened and formalised as part of any future planning application.
- 1.1.7 In addition to the residential elements of the development, it is anticipated that Phase 1 could include a community orchard, a neighbourhood green, structural planting, meadow parkland and an area for active sports.
- 1.1.8 This Transport Feasibility Study considers the transport opportunities provided by the Phase 1 scheme, including access by sustainable modes. It also determines the level of traffic anticipated to be generated during the typical AM and PM peak hours and considers the forecast baseline traffic flows until 2036, being the end of the Plan period of both the emerging Suffolk Coastal Local Plan and Ipswich Local Period. This study also considers appropriate design of the site access to serve Phase 1.
- 1.1.9 In addition to the general context of the site, this report will explore how the site's location could provide an excellent opportunity to link to the inner option of the Ipswich Northern Route was promoted.

## 1.2 Planning History and Site Allocations

- 1.2.1 The site is located within Suffolk County and Suffolk County Council (SCC) act as highway authority for the area; however, Phase 1 of the development is located in both East Suffolk Council (formerly Suffolk Coastal District Council) and Ipswich Borough Council, both of whom will require consultation as part of the proposals. The location of the site relative to the district boundaries are shown on **Figure 1.2** below.

Figure 1.2: East Suffolk Council and Ipswich Borough Council boundaries



## 2 Existing Conditions

### 2.1 Introduction

- 2.1.1 This chapter sets out the context of the Phase 1 site in terms of the local highway network and explores the current situation of the site in terms of sustainable transport.

### 2.2 Local Highway Network

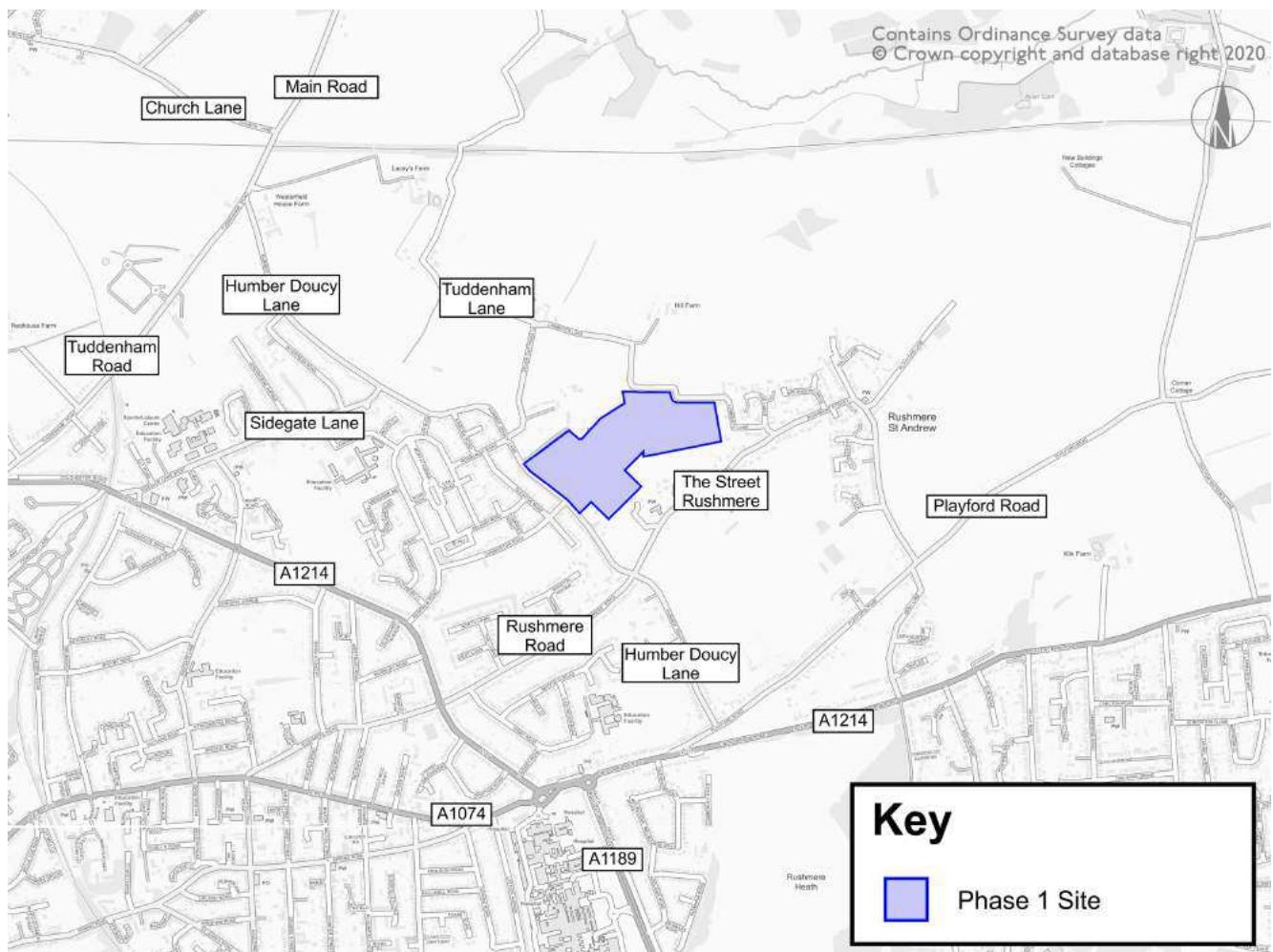
- 2.2.1 The first phase of development is to be located on land to the northeast of Humber Doucy Lane, extending from Rushmere Village Hall to Tuddenham Lane. The village of Rushmere St Andrew is approximately 650m to the east of the site, and Ipswich Town Centre is approximately 3km to the southwest.
- 2.2.2 Access to the Phase 1 site is currently provided off Humber Doucy Lane via an agricultural access located approximately 40m north of Dumbarton Road. This will be widened and formalised as part of any future planning application in order to appropriately serve the site. The access is currently an opening in the hedge line and is shown in **Figure 2.1** below.

Figure 2.1: Existing Site Access off Humber Doucy Lane



- 2.2.3 Humber Doucy Lane joins The Street Rushmere and Rushmere Road to the south via a mini roundabout, providing a connection to the village of Rushmere St Andrews to the east, and Ipswich Town Centre to the southwest respectively. At its northern extent, Humber Doucy Lane connects with Tuddenham Lane, which provides an alternative route to Ipswich Town Centre and a connection to the village of Westerfield and the A14. The local highway network in relation to the Phase 1 site is illustrated in **Figure 2.2**.

Figure 2.2: Local Highway Network



### Humber Doucy Lane

- 2.2.4 Humber Doucy Lane lies on a north-west to south-east axis and is subject to a 30mph speed limit. It has a 6m carriageway width outside the site access and benefits from 2m footway on its southern side. The road does not benefit from a centreline in the vicinity at the site frontage, and there are no parking restrictions along its extent, on site observations revealed that vehicles park on both sides of the carriageway.
- 2.2.5 To the south of the site, Humber Doucy Lane joins The Street Rushmere and Rushmere Road via a mini roundabout, where traffic can head south-west on Rushmere Road towards Ipswich Town Centre or north-east on The Street Rushmere towards the village of Rushmere St Andrew.

### The Street Rushmere

- 2.2.6 The Street Rushmere lies on a north-east to south-west axis and is a single carriageway road with a 4.5m carriageway width. It is subject to a 30mph speed limit and benefits from double yellow line restrictions to restrict parking along the carriageway. There is also a segregated footway along the northern side of the carriageway, which provides direct access to the Public Right of Way (PRoW) network that dissects the site. The Street Rushmere also provides pedestrian access to the village of Rushmere St Andrew via a continuous footway along the northern side of the carriageway.

### Rushmere Road

- 2.2.7 Rushmere Road lies on an east to west axis and is a single carriageway road with a 6m carriageway width. It is subject to a 30mph speed limit and benefits from double yellow line restrictions to restrict parking on the carriageway. Rushmere Road runs through the centre of a residential estate, with 2m footways on both sides of the carriageway. It continues west and provides a route towards Ipswich Town Centre via the A1156 Woodbridge Road.

### Tuddenham Road

- 2.2.8 Humber Doucy Lane extends north-westerly to Tuddenham Road via a priority junction, which enables connection to the village of Tuddenham to the north and the A1214 Colchester Road to the south, which continues towards Ipswich Town Centre. Tuddenham Road is subject to a 30mph speed limit within the vicinity of the junction with Humber Doucy Lane, and has a 6m carriageway width.

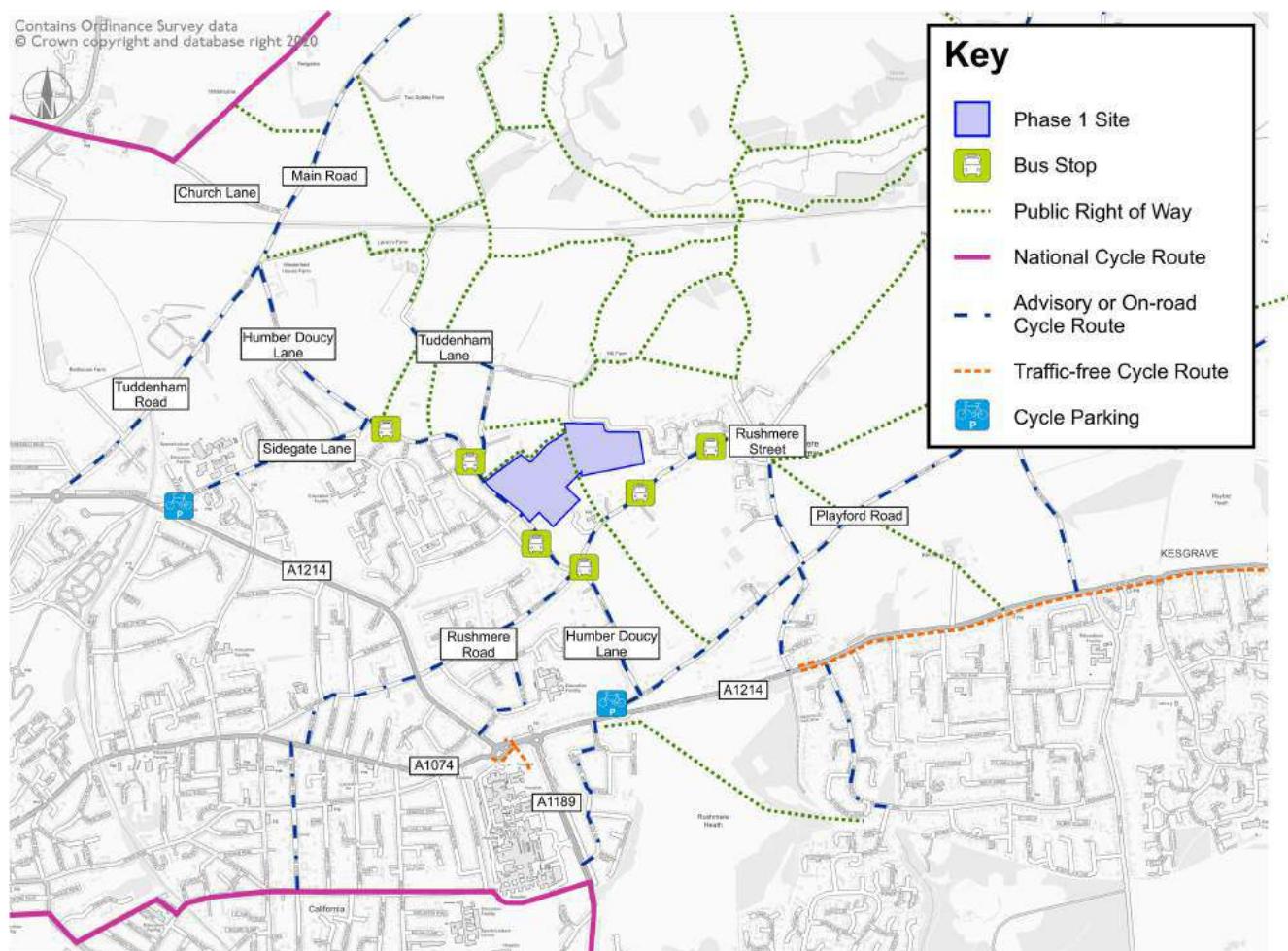
### Sidegate Lane

- 2.2.9 Sidegate Lane is single carriageway road accessed off Humber Doucy Lane opposite Ipswich Rugby Club, and provides a secondary route through a residential estate to join the A1214 Colchester Road, which continues towards Ipswich Town Centre. It is subject to 30mph speed limit and has a 6m carriageway width, and benefits from street lighting.

## 2.3 Walking and Cycling Accessibility

- 2.3.1 A desktop study has been undertaken to understand the existing facilities for pedestrians and cyclists within the vicinity of the proposed site and shown below on **Figure 2.3**.

Figure 2.3: Public Rights of Way (PRoW) and Cycling Routes



2.3.2 The nearby area benefits from numerous footways which follow the route of the local highway network and throughout the neighbouring residential estate. It is envisaged that these existing routes will be utilised and promoted for leisure usage. Suffolk County Council also provides an online map of all of the Public Rights of Way (PRoW), which identifies that a PRoW runs directly through the centre of the proposed site another that lies on the western boundary of the site.

2.3.3 In terms of cycling accessibility, Ipswich Borough Council provides an online cycle map illustrating the on-road and off-road cycle routes within and around the town (together with cycle parking facilities) and these routes are identified in **Figure 2.3**.

2.3.4 The online map indicates the following cycle facilities within the vicinity of the proposed site:

- The full extent of Humber Doucy Lane is an advisory cycle route;
- The full extent of Rushmere Street is an advisory cycle route;
- Seven Cottages Lane, to the north of the site is an advisory cycle route. This lane turns into Tuddenham Lane which is also an advisory cycle route, before becoming a public bridleway;
- Melborne Road and Adelaide Road, to the south of Humber Doucy Lane, forms an on-road signed cycle route (National Cycle Route number 4);
- There is cycle parking where Humber Doucy Lane meets Woodbridge Road East (via Playford Road) and where Sidegate Lane meets the A1214;

- There are small sections of traffic-free cycle routes to the south of Humber Doucy Lane (at the A1214/A1189 roundabout) and on the A1214 Woodbridge Road to the south of Rushmere St Andrew; and
- The westbound side of the A1214 Woodbridge Road, to the east of Rushmere Golf Course is a traffic free cycle route.

## 2.4 Access to Local Amenities

2.4.1 Guideline walking distances provided in the Chartered Institution of Highways and Transportation (CIHT) document 'Guidelines for Providing for Journeys on Foot (2000)', are shown in **Table 2.1**.

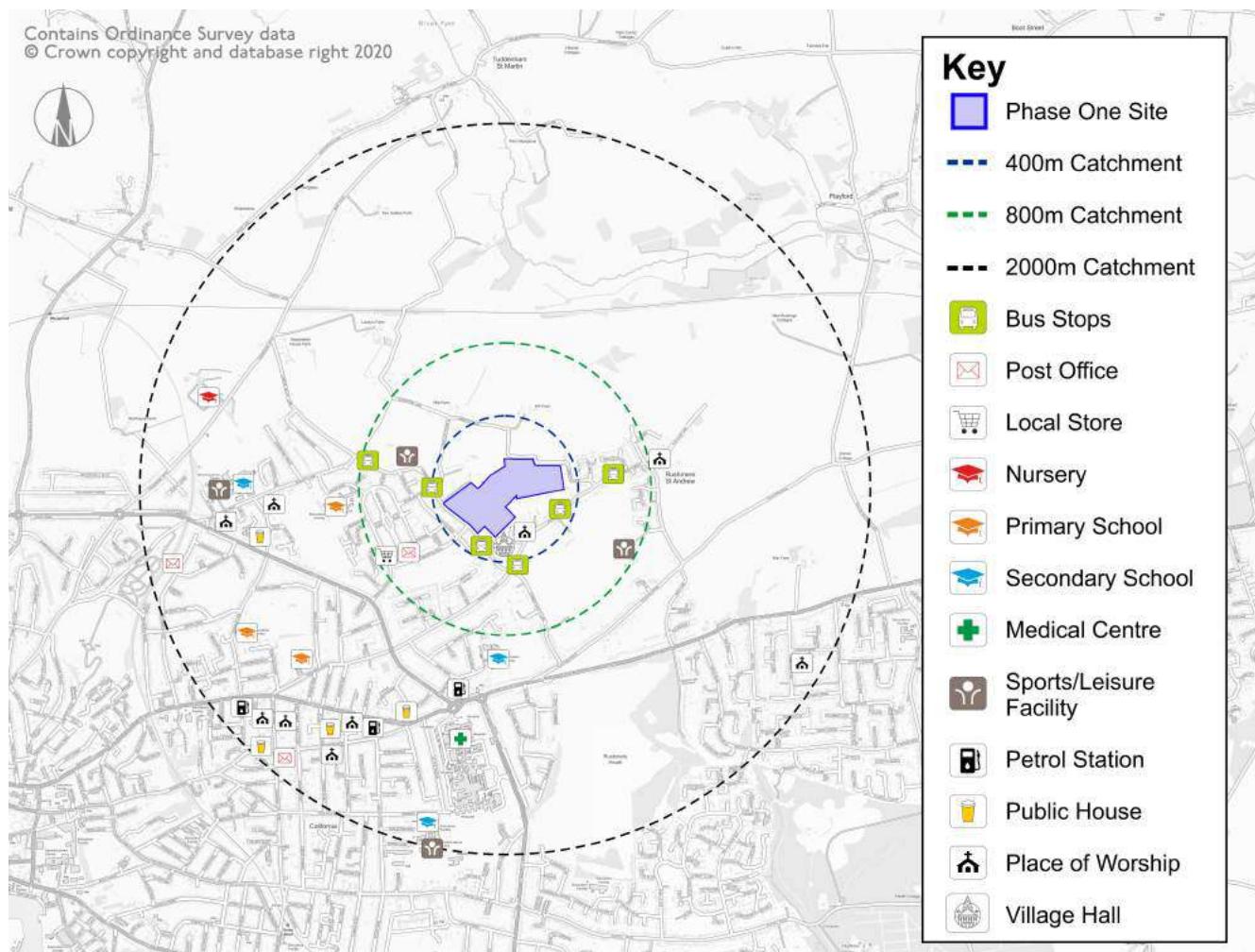
**Table 2.1: CIHT Guideline Acceptable Walking Distances**

Criteria	Town Centre	Commuting / Sight Seeing
Desirable	200m	500m
Acceptable	400m	1,000m
Preferred Maximum	800m	2,000m

2.4.2 The CIHT guidelines shown in **Table 2.1** suggest that, for commuting purposes, up to 500m is a desirable walking distance, up to 1km is considered an acceptable walking distance and 2km is the preferred maximum walking distance.

2.4.3 Considering the walking distance guidelines above, a desk-top study has been undertaken to understand the number and type of local amenities in the local area and to identify those that will be accessible on foot. **Figure 2.4** below outlines the findings.

Figure 2.4: Amenities Location Plan



- 2.4.4 As can be seen in the figure above, there are a number of bus stops within 400m of the proposed residential site (with the nearest bus stop within 100m). Rushmere Village Hall, a place of worship and a community centre are also within a 400m catchment.
- 2.4.5 Within 800m, further bus stops are accessible, as is another place of worship. There are also two sports and leisure facilities, a local convenience store and a post office within the 800m catchment area.
- 2.4.6 Further afield within 2000m, there are numerous education facilities, places of worship, public houses, petrol stations, post offices, leisure facilities and a medical centre; all of which are accessible for the residents of the proposed development.

## 2.5 Bus Accessibility

- 2.5.1 The nearest bus stop to the proposed site is called the Community Hub, located at Rushmere Village Hall on Humber Doucy Lane. This is less than 100m from the Phase 1 site and can be reached on foot within 2 minutes. The 59 bus serves this stop and provides a connection towards Ipswich Town Centre and Rushmere during the week and on Saturday; there is currently no Sunday service.
- 2.5.2 The 59 service also serves the Roxburgh Road stop on Humber Doucy Lane, to the north of the site access.

- 2.5.3 Slightly further afield, there is a second bus stop at Rushmere Road which can be reached on foot within 6 minutes. This stop is served by the 59 service and the 71 and 72 services. The 71 service runs a weekday and Saturday route between Sudbourne and Ipswich, via Orford, Hollesley and Woodbridge. In addition, the 72 service operates during the week, connecting Woodbridge and Ipswich via Martlesham and Playford.
- 2.5.4 A summary of the bus timetables described above are shown in **Table 2.2** below for reference.

**Table 2.2: Local Bus Services**

Service No	Route	Approx. Frequency – 2 way (buses/hour)		
		Weekday	Sat	Sun
59	Ipswich – Chelsworth Avenue - Rushmere	Hourly	Hourly	-
71	Sudbourne – Orford – Hollesley – Woodbridge - Ipswich	08:08	08:08	-
72	Woodbridge – Martlesham – Playford - Ipswich	09:48 and 13:03	-	-

- 2.5.5 These existing services and stops provide future residents with an opportunity to travel sustainably using public transport, which is accessible on foot.

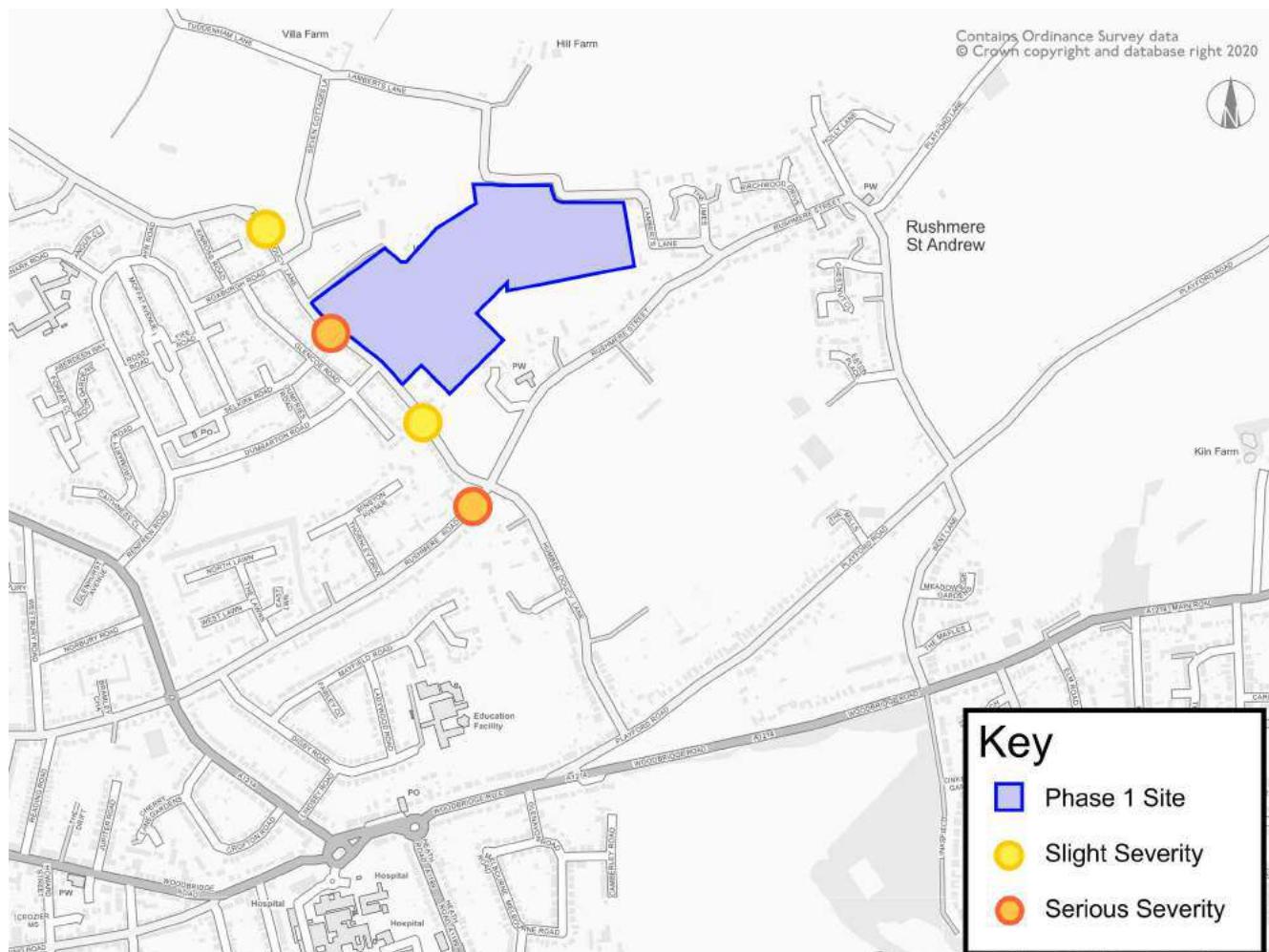
## 2.6 Rail Accessibility

- 2.6.1 There are two railway stations within proximity of the proposed site; with the closest being Derby Road Railway Station located 3km south of from the site. This railway station is located on the Felixstowe branch line which serves the Rose Hill area and southern area of California, Ipswich. There is an hourly service in each direction between Felixstowe and Ipswich. The railway station is managed by Greater Anglia trains.
- 2.6.2 Derby Road Railway Station is accessible from the site via a 10 minute cycle ride or a 6 minute car journey. This railway station is currently not easily accessible from the site via bus.
- 2.6.3 Westerfield Railway Station is also located close the site; approximately 3.5km northwest of the site. Westerfield station is on a branch line off the Great Eastern Main Line and is currently managed by Greater Anglia, who operate all trains serving the station. There is an hourly shuttle service to Ipswich via the Felixstowe line and there is a limited peak hour only service between Lowestoft and Ipswich.
- 2.6.4 Westerfield Railway Station is accessible via car in approximately 6 minutes. Westerfield railway station can also be accessed via public transport; the fastest route is served by the number 59 bus which runs from the Community Hub at Rushmere Village Hall. This journey would take approximately 19 minutes.
- 2.6.5 Individuals could also cycle to Westerfield Railway Station, where cycle parking is available, which would take approximately 11 minutes.

## 2.7 Road Safety Review

- 2.7.1 Personal Injury Collision (PIC) data has been obtained from Crashmap (crashmap.co.uk) for the most recently available six-year period (January 2013 and September 2018). The study area includes Humber Doucy Lane and the Humber Doucy Lane / Rushmere Road / The Street Rushmere roundabout.
- 2.7.2 The following figures show the extent of the local highway network being studied, location and severity of the PIC's reported during the study period.

**Figure 2.5: PIC Location Plan**



- 2.7.3 As shown in **Figure 2.5**, there were two collisions of serious severity and two collisions of slight severity within the specified search area during the study period. There were no fatal collisions reported within the search area during the 6 year period.
- 2.7.4 Based on the narrative, the collisions of serious severity occurred as a vehicle collided with a goods vehicle along Humber Doucy, with a child being injured; and a vehicle collided with a cyclist at the Humber Doucy Lane / Rushmere Road / The Street Rushmere roundabout.
- 2.7.5 The collisions of slight severity were due to a motorcyclist crashing after passing a stationary vehicle; and a vehicle with an inexperienced driver crashing along Humber Doucy Lane (no other vehicles were involved in the collision).

- 2.7.6 Based on the low number of collisions and their spread throughout the study area over the latest six-year period, it is concluded that there is no evidence to suggest that the proposed development will have a detrimental impact on highway safety.

## 2.8 Modal Share

- 2.8.1 The current modal split has been obtained from the 2011 Census data for “Method of Travel to Work” for the Rushmere St Andrew ward (E050007218), where the development is located. This travel data has been summarised below in **Table 2.3**.

**Table 2.3: Modal Share – Rushmere St Andrew Ward**

Method of Travel to Work	Modal Split
Underground, metro, light rail, tram	0%
Train	3%
Bus, minibus or coach	4%
Taxi	0%
Motorcycle, scooter or moped	1%
Driving a car or van	76%
Passenger in a car or a van	5%
Bicycle	5%
On foot	5%
Other method of travel to work	1%
<b>Total</b>	<b>100%</b>

- 2.8.2 The table above indicates that 81% of people in the Rushmere St Andrew ward currently travel to work by car, of which 76% are single occupancy car trips. Sustainable trips comprise of 5% walking to work, 3% using the train, 5% cycle to work and 4% use the bus. This indicates that by improving walking, cycling and public transport facilities to connect the site to the local area could provide an excellent opportunity to shift travel behaviours towards more sustainable modes of travel and reduce reliance on the car, particularly single occupancy car trips.
- 2.8.3 Consequently, the promotion of this site will assist in encouraging new and existing residents within the area to travel by sustainable modes of transport. This will be supported by preparing a Travel Plan to set out realistic measures to reduce the number of single-occupancy vehicle trips generated as a result of the development. It will also propose methods for implementing and monitoring the Travel Plan to achieve this modal shift. The Travel Plan can then be implemented for the wider site to help promote

sustainable transport for a greater audience. Some of the key measures that could be implemented are explored further in **Chapter 5**.

## 3 Access Strategy and Parking Standards

### 3.1 Introduction

3.1.1 The following section takes into consideration the existing transportation infrastructure outlined in previous chapters and explores the deliverability of the Phase 1 development at Humber Doucy Lane.

### 3.2 Access Strategy

3.2.1 Currently, it is proposed to deliver up to 200 dwellings as part of the first phase of the development with site access proposed via Humber Doucy Lane. The Phase 1 site already benefits from agricultural access onto Humber Doucy Lane. This will need to be widened and formalised as part of any development proposals.

3.2.2 To understand SCC access requirements to serve the development, the design guidance set out within Suffolk County Council has been reviewed. This outlines the size and scale of access roads for developments based on the proposed number of dwellings.

3.2.3 The SCC Design Guide states that Major Access Roads would be suitable for residential developments and roads serving more than 150 and up to 300 dwellings, and the following criteria should be met:

- “Two points of access should be provided to the part of the site being served and the road layout should conveniently connect those points of access”;
- ‘Where only one point of access is available, the road layout should form a circuit and there should be the shortest practical connection between this circuit and the point of access. This should always form the stem of a T-junction’; and
- “The minimum spacing between junctions should be 50m”.

3.2.4 The site proposes to provide a T-junction onto Humber Doucy Lane. A loop road within the site approximately 50m north of Humber Doucy Lane will provide a circuit within the internal road network.

3.2.5 In addition, a secondary emergency access point will be provided via the PRoW on the western boundary of the site.

3.2.6 The proposed site access will be positioned slightly north of the existing access point in order to ensure 50m junction separation with the Humber Doucy Lane / Dumbarton junction.

### 3.3 Background Traffic flows

3.3.1 To determine the current traffic volumes on Humber Doucy Lane and to inform the site access design, baseline traffic flows and vehicle speeds have been determined via an Automated Traffic Count survey (ATC), undertaken over a consecutive 7-day period (12/07/19 –18/07/19) in the vicinity of the proposed site access. Currently the speed limit on Humber Doucy Lane is 30mph.

3.3.2 The ATC survey results have been analysed to calculate 85<sup>th</sup> percentile speeds and subsequently used to derive appropriate visibility splays, in line with the Manual for Streets (MfS) guidance. The 85<sup>th</sup> percentile speeds identified within the survey are included in **Table 3.1** below for reference.

**Table 3.1: 85<sup>th</sup> percentile speeds and MfS Visibility Requirements**

Direction	85 <sup>th</sup> percentile speed	MfS Visibility Requirements
Northbound	30.4mph	43.8m
Southbound	34.7mph	53.4m

3.3.3 The proposed access junction arrangement has been shown on **Drawing J32-4587-PS-001**, which demonstrates that the required horizontal visibility splays can be achieved. This has been designed in line with guidance set out about from the Suffolk Design Guide for Residential Areas and from the Manual for Streets (MfS) and can be delivered in line with this guidance.

### 3.4 Swept Path Analysis

3.4.1 In addition to the above, swept path analysis has been undertaken to ensure that a refuse vehicle would be able to access and egress the proposed Phase 1 development in a forward gear. A Traffic Regulation Order (TRO) in the form of yellow lines has been included within the access design to protect the access from potential on-street parking. The swept path analysis assessment is shown on **Drawing J32-4587-PS-002**.

### 3.5 Cycleways and Pedestrian Routes

3.5.1 The SCC design guide comments that for larger residential housing schemes, joint pedestrian and cycle routes should link housing areas with community facilities, schools, shopping and places of employment. Further, the footpath layout should meet the needs of elderly people. These routes need to be carefully positioned and designed in order that their use will be maximised.

3.5.2 When the provision of a footpath or footway is required it will be necessary to ensure that it is sufficiently wide and well aligned to:

- Avoid the need for pedestrians when passing each other to step out into bus carriageways or to cause damage to planted areas;
- Allow for ramped crossing to garage drives or parking spaces;
- Allow, when necessary, for occasional access along footpath by emergency vehicles; and
- Provide for statutory and another services underground.

3.5.3 Major routes will link to housing areas with schools, shopping centre and employment areas. The absolute minimum width should be:

- Cycleway – 2 metres;
- Footway – 1.8 metres.

3.5.4 The internal road network for the Phase 1 development will be designed to provide 2m footways on both sides of the carriageway throughout the site, as well as providing links to the existing PRoW network shown within **Figure 2.4** and existing footways along Humber Doucy Lane.

### 3.6 Providing for people with disabilities

3.6.1 Access to any development should be available to all sections of the community. With this in mind, the following provisions should be considered:

- Suitable access routes for wheelchairs and the marking out of parking spaces close to pedestrian entrances;
- At all road junctions for pedestrians to cross the minor road with a minimum of inconvenience. Kerbs should, therefore, be dropped flush with the carriageway and tactile paving provided at all junctions;
- Firm, non-slip surfaces and options that avoid steps; and
- Particular attention should be paid to the locations at which pedestrian routes cross the carriageway so that footway and footpath users are not exposed to unexpected dangers.

3.6.2 The highway network within the site will be designed in line with the above to ensure accessibility for all users.

### 3.7 Parking Standards

3.7.1 SCC outline the parking standards that should be followed within the curtilage of new developments within the SCC Suffolk Guidance for Parking, Technical Guidance (Third Edition) May 2019. The relevant standards are detailed within **Table 3.2** below.

**Table 3.2: SCC Parking Standards**

Land Use	Car Parking (minimum)	Cycle Parking (minimum)
1 Bedroom House or Flat	1 space per dwelling	
2 Bedroom House or Flat	2 spaces per dwelling*	2 secure covered spaces per dwelling. (Satisfied if garage or secure area is provided within curtilage of dwelling to minimum dimensions)
3 Bedroom House or Flat	2 spaces per dwelling	
4 Bedroom House or Flat	3 spaces per dwelling	

\*reduction in this figure may be considered with a robust and degreeed highway mitigation

3.7.2 The parking guidance also contains information regarding the size and quantum of cycle parking that should be included for new residential developments. Thus, any planning application for Phase 1 and/or the wider site should adhere to this guidance.

### 3.8 Potential Constraints for Phase 1

3.8.1 As previously noted, there are various parcels of land along Humber Doucy Lane identified within both the Suffolk Coastal and Ipswich Local Plan SHELAA which refer to potential constraints of the area within the vicinity of Humber Doucy Lane.

3.8.2 In terms of highways, one of the key constraints is the increase in the development in the area impacting the local highway network. In addition, due to the proximity and connectivity of the site to Ipswich, and in order to seek to mitigate any impacts on the surrounding network, it is expected that a robust package

of measures to promote sustainable transport would form part of any proposals, such as a Travel Plan and a strategy to connect the site to the existing PRoW network. This has been explored further in **Chapter 5** of this report.

## 4 Traffic Flows, Trip Generation and Distribution

### 4.1 Introduction

4.1.1 In order to confirm that the site access design discussed within **Chapter 3** will be suitable for the Phase 1 proposal the traffic conditions on the local highway network currently and in the future; the following have been considered:

- Future year traffic growth;
- Development traffic flows and distribution;
- Assessment area and scenarios; and
- Junction capacity assessments.

### 4.2 Trip Generation

- 4.2.1 An assessment has been undertaken to calculate the potential trip generation of the proposed site using the TRICS database (Version 7.6.1). Multi-modal trip rates were obtained using the TRICS database for total persons and vehicle trips. TRICS category '03 –Residential' subcategory 'A – Houses Privately Owned' has been selected for sites ranging between 60 – 300 dwellings that are located within England, excluding Greater London. This search query has returned 20 sites within the TRICS database.
- 4.2.2 The network peak hour people and vehicle trip rates included in **Table 4.1** below. These trip rates have been applied to the development quantum to forecast the trip generation at the site (200 dwellings).

**Table 4.1: Trip Rates and Trip Generation**

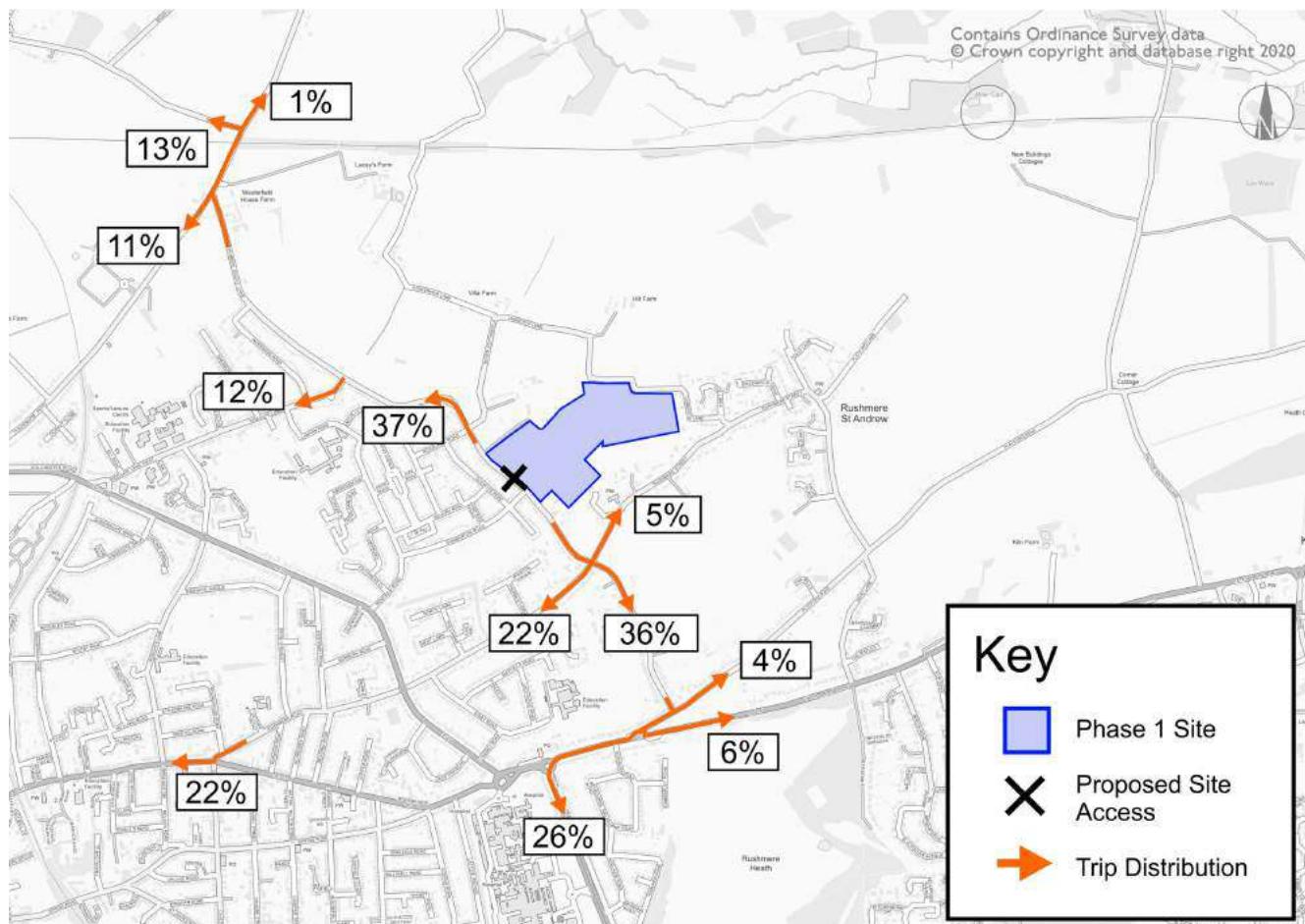
	Weekday AM Peak (08:00-09:00)			Weekday PM Peak (17:00-18:00)		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Total People Trip Rate	0.176	0.651	0.827	0.526	0.234	0.76
Total People Trips	35	130	165	105	47	152
Vehicle Trip Rates	0.111	0.332	0.443	0.299	0.144	0.443
Vehicle Trips	22	66	88	60	29	89

- 4.2.3 **Table 4.1** shows that the site could generate 165 people movements in the morning peak hour, and 155 people movements in the evening peak hour. Of these 88 and 89 two-way vehicle trips could be generated in the AM and PM peaks respectively.

### 4.3 Trip Distribution and Traffic Assignment

- 4.3.1 The forecast vehicular trip generation shown in **Table 4.1** has been distributed and assigned on the local network based on using the Office for National Statistics “Method of Travel to Work” data. **Figure 4.1** below summarises the likely percentage traffic impact from Phase 1 on the local highway network in the network peak hours.

**Figure 4.1: Traffic Distribution**



- 4.3.2 **Figure 4.1** shows that from the proposed site access on Humber Doucy Lane, 37% of trips will head northbound. These trips will route to Sidegate Lane (12%), Westerfield (13%), Tuddenham (1%) and Ipswich (11%). The remaining trips (63%) will head in a southerly direction towards the Humber Doucy Lane / Rushmere Road / The Street Rushmere Junction.
- 4.3.3 Here 22% of trips that head west towards the A1214 and Ipswich Town Centre via Woodbridge Road, 5% will head towards Rushmere Village and 6% will head towards the Humber Doucy Lane / Playford Road junction.
- 4.3.4 Beyond which, 4% of trips will head east on Playford Road towards East Suffolk and 6% of trips will head towards the A1214 eastbound towards the A12, whilst 26% will heading south towards the A1189 south towards Felixstowe.

## 4.4 Committed Developments

- 4.4.1 Currently there are no identified proposed developments within the vicinity of the site that would require to be considered as committed developments as part of the Phase 1 proposal, however this will need be discussed further with Suffolk County Council and Ipswich Borough Council as part of any future planning applications for both the Phase 1.

## 4.5 Future Year Traffic Growth

- 4.5.1 TEMPro v7.2 calibrated with the National Transport (NTM AF15) dataset has been used to generate traffic growth factors specific to the site's MSOA (Ipswich 004) with a base year of 2019. Growth factors for 2020 (assumed year for submission of planning application), 2025 (assumed opening year of the site) and 2036 (end of the Suffolk Coastal Local Plan period) have been derived and are presented in **Table 4.2** below.

**Table 4.2: TEMPro Growth Factors**

Time Period	2020 Growth Factor	2025 Growth Factor	2036 Growth Factor
AM Period	1.013	1.098	1.185
PM Period	1.013	1.099	1.186

## 4.6 Assessment Scenarios

- 4.6.1 It is proposed to carry out assessments of the following scenarios for the AM and PM peak hour periods:
- 2020 Future Year + Development (AM and PM peak hour);
  - 2025 Future Year + Development (AM and PM peak hour); and
  - 2036 Future Year + Development (AM and PM peak hour).

## 4.7 Junction Capacity Assessment

- 4.7.1 Industry standard software package, Junctions 9 (PICADY), has been used to assess the capacity of the proposed site access junction.
- 4.7.2 In terms of modelling results, a Ratio of Flow to Capacity (RFC) value of 0.85 or less typically demonstrates that a junction arm or turning movement is operating within practical capacity and is therefore unlikely to experience regular queuing. However, junctions that are operating between 0.85 and 1.00 are considered to be operating within theoretical capacity. Any junction operating over 1.00 is considered to be operating outside of acceptable thresholds of capacity. The queue results are measured in vehicles and the delay results are measured in seconds per vehicle.
- 4.7.3 The baseline flows are discussed in **Section 3.3**. The above TEMPro factors have been applied for the 2019 flows in order to utilise in the junction capacity modelling
- 4.7.4 A summary of the modelling results for the site access junction are presented below in **Table 4.3**, and the full PICADY outputs are included in **Appendix A**.

**Table 4.3: Site Access Junction Capacity Assessment**

Approach	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (17:00 – 18:00)	
	Queue (Veh)	RFC	Queue (Veh)	RFC
2020 Baseline + Proposed Development				
Site Access	1	0.09	0	0.04
Humber Doucy Lane	0	0.03	1	0.09
2025 Future Year + Proposed Development				
Site Access	1	0.09	0	0.04
Humber Doucy Lane	0	0.04	1	0.09
2036 Future Year + Proposed Development				
Site Access	1	0.09	0	0.04
Humber Doucy Lane	1	0.04	1	0.09

4.7.5 **Table 4.3** above indicates that the proposed site access onto Humber Doucy Lane will operate within practical capacity during the morning and evening peak hour periods for all of the scenarios assessed.

## 4.8 Wider Highway Network Impact

4.8.1 As well as immediate traffic impacts on the proposed site access, the wider distribution pattern detailed within **Figure 4.1** indicates that the delivery of the 200 dwellings for Phase 1 will have a highways impact upon the following key junctions in the local area and will need to be assessed in more detail as part of any future planning application or further study work;

- Humber Doucy Lane / Tuddenham Road Priority Junction;
- Humber Doucy Lane / Rushmere Road / The Street Rushmere Roundabout;
- Humber Doucy Lane / Sidegate Lane priority junction;
- Sidegate Lane West / A1214 Colchester Road junction;
- A1214 Colchester Road / Tuddenham Road Roundabout; and
- Rushmere Road / Colchester Road roundabout.

4.8.2 The traffic impact of the wider site will also need consider the junctions detailed above but due to the possibility of assigning trips to the Ipswich Northern Route (Inner Option), a new traffic distribution and assignment assessment will need to be undertaken if the current position for Suffolk County Council changes.

## 5 Travel Planning

### 5.1 Introduction

- 5.1.1 An important component of delivering a residential development is the provision of appropriate sustainable transport infrastructure and supporting measures to promote the uptake of sustainable transport from the outset.
- 5.1.2 Some of the measures will increase the sustainability of the site by improving the level of public transport and walking/cycling (as discussed in the **Chapter 2**), and as a result will have a longer-term delivery timescale. Other measures will be site specific and can be more readily introduced in order to promote sustainable travel amongst future residents.

### 5.2 Travel Plan

- 5.2.1 The promote travel away from single occupancy vehicles a comprehensive Travel Plan should be delivered as part of the future planning application and will be delivered in line with Suffolk County Council guidance. It is likely that the Travel Plan will include measures such as welcome packs, doctor bike sessions, cycle training and potential subsidies towards public transport tickets and cycle equipment.
- 5.2.2 The Travel Plan will be managed by a dedicated co-ordinator and will be monitored in relation to a series of agreed targets in consultation with East Suffolk Council and Ipswich Borough Council as key stakeholders.

### 5.3 Pedestrian and Cycle Improvements

- 5.3.1 The proposals will include a network of pedestrian and cycle routes throughout the site to link with existing provision in the surrounding area; as including along the existing advisory cycle route along Humber Doucy Lane.
- 5.3.2 In addition, the cycle network will accommodate future provision to connect to the 'Inner' option of the Ipswich Northern Route (if this is route that is progressed). It is anticipated that a 3m cycleway will be provided alongside the carriageway to connect the site towards the A14 and the A12, as well as a number of villages enroute.
- 5.3.3 Cycle parking will be provided to meet the standards prescribed by Suffolk County Council and include visitor parking in public spaces. Complementary infrastructure should also be provided such as fixed bike pumps and tool kits.

### 5.4 Car Clubs

- 5.4.1 Car Clubs could be introduced for the future residents of the development to provide an alternative for those who do not require regular use or ownership. There are potential partnerships with existing providers such as 'Enterprise Rent-a-Car' that should be explored in the future.
- 5.4.2 The benefits of a car club are as follows:
  - Access to vehicles without financial burden of ownership;
  - No maintenance cost;
  - UK wide access; and

- Vehicles can be reserved in advance or last minute.

- 5.4.3 Car clubs typically work by providing residents/customers with an individual membership card to allow instant access to the network of vehicles within the car club. The schemes generally work through a dedicated app, through which residents can book a car when required.
- 5.4.4 A number of car club operators are transferring towards hybrid or electric vehicles which have clear benefits in terms of positively contributing towards the nationwide air quality targets.
- 5.4.5 Typically, there is a membership fee for the year and driving hours are paid for by credits. A developer would generally pre-load membership cards to an agreed level of credits for residents in order to sample the scheme and allow travel habits to form and to adopt to the car club scheme.

## 5.5 Electric Vehicle (EV) Charging Points

- 5.5.1 Local policy guidance seeks to promote electric vehicles by providing the appropriate infrastructure from the outset in order to facilitate use of electric and hybrid vehicles. The proposed site will provide electric vehicle charging facilities in line with current policy guidelines.

## 6 Summary and Conclusion

### 6.1 Summary

- 6.1.1 This transport feasibility study has been prepared on behalf of Bloor Homes in regard to the proposed residential development to the north east of Humber Doucy Lane. The initial land parcel of the development is expected to provide circa 200 dwellings, with the site acting as a possible gateway for a further 1,200 dwellings and a connection to the potential Ipswich Northern Route (Inner Route). Whilst we understand that Suffolk County Council are not proceeding with the next stage of the business case into the Northern Relief Road, as confirmed at the Cabinet meeting on 25th February 2020, should this change in the future, the proposed Site can assist in the delivery of the Road. With Bloor Homes controlling a large part of the land to the north of Humber Doucy Lane, it is uniquely placed to be able to assist in the delivery of a relief road if required in the future.
- 6.1.2 The current situation in terms of sustainable transport has been explored and the key findings are summarised below:
- There are numerous local amenities accessible for the new residents to use however, should the full quantum of development come forward (up to 1,400 dwellings) it will be necessary to include additional local amenities within the proposals;
  - Following a review of the most recent Personal Injury Collision records, there is no evidence to show the proposed development will have a detrimental impact on highway safety;
  - The pedestrian and cycle networks surrounding the Phase 1 development are of good quality, and the site is accessible from the existing bus services located along Humber Doucy Lane; and
  - Derby Road and Westerfield Rail Stations are accessible from the site and allow connection to Felixstowe, Ipswich and Lowestoft.
- 6.1.3 The Phase 1 site is proposed to be accessed via T-junction of Humber Doucy Lane. The access will include with a loop road within the site approximately 50m north of the access, providing a circuit appropriate to serve the development. In addition, the existing PROW route will be upgraded to provide a secondary emergency access on the western boundary of the site.
- 6.1.4 The proposed access junction arrangement shown on **Drawing J32-4587-PS-001**, demonstrating the appropriate horizontal visibility splays can be achieved. This access is in line with guidance set out in the Suffolk Design Guide for Residential Areas and Manual for Streets (MfS). Furthermore, through junction modelling to be suitable to provide safe access for residents of the proposed development, without negatively impacting existing nearby residents.
- 6.1.5 A trip generation and distribution exercise has been undertaken which has identified that the development traffic will head towards Ipswich Town Centre to the south west, the A14 to the west and A12 to the east via Humber Doucy Lane (as well as other villages enroute). Furthermore, the development traffic could be further distributed along additional routes if the inner option of the Ipswich Northern Route is progressed, as the proposed alignment currently passes through the wider site (just south of the railway line) and would provide the option for residents to access the bypass directly.

- 6.1.6 As part of a future planning application for Phase 1, a Travel Plan (TP) will be submitted which will set out the key aim of reducing the number of single-occupancy vehicle trips generated as a result of the development. It will also include proposals methods for implementing and monitoring the TP to achieve a modal shift. This TP can then be developed further for the wider site to provide a comprehensive sustainable transport strategy to help promote sustainable transport for the site.

## 6.2 Conclusion

- 6.2.1 In conclusion it has been demonstrated that the site could deliver a significant volume of residential development that would have access to a range of sustainable modes of transport. The proposals have been reviewed in line with the NPPF, SCC and other national best practice guidance documents and have been found to be in accordance with the transportation related policy contained within.

## APPENDICES

This drawing has been produced by mode transport planning.  
No responsibility will be accepted for the use of this drawing in any other project.  
DO NOT SCALE OFF THIS DRAWING.



visi 2.4m x 53.4m (34.7mph - MfS)

R11.0

2.0  
6.3  
2.0

HUMBER DOUCY LANE

279

Footpath to provide tactile crossing points to existing footway provision.

Proposed extent of double-yellow line restriction in order to assure refuse vehicle can manoeuvre into the site without obstruction see drawing J32-4483-PS-002

visi 2.4m x 43.8m (30.3mph - MfS)

drawing title

Indicative Access Design & Horizontal Visibility Splays

client

Bloor Homes

job title

Land off Humber Doucy Lane, Ipswich

mode transport planning

LABS Atrium  
Stables Market  
Chalk Farm Road  
London  
NW1 8AH

t 020 7293 0217  
e info@modetransport.co.uk  
w www.modetransport.co.uk

mode  
transport planning

scale 1:500@A3

drawn

mf

B

A 21-02-20  
31-07-19

Revised Footway Issued

checked

pt

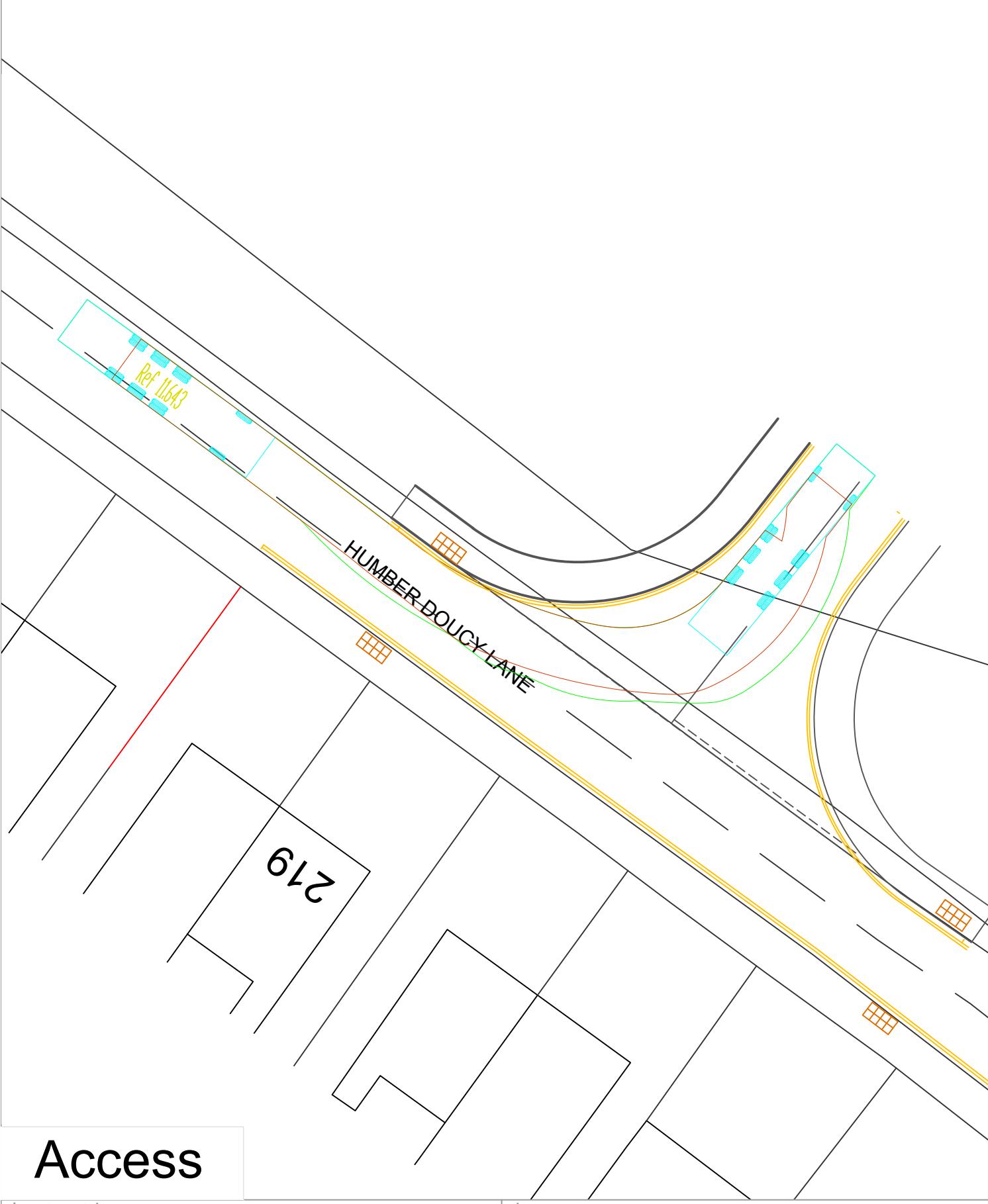
C

Created July 19

drawing no.

J32-4483-PS-001

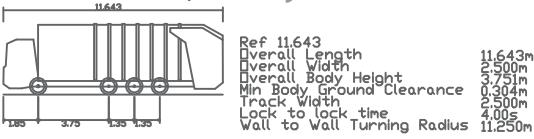
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## Access

drawing title

### Refuse Vehicle Swept Path Analysis

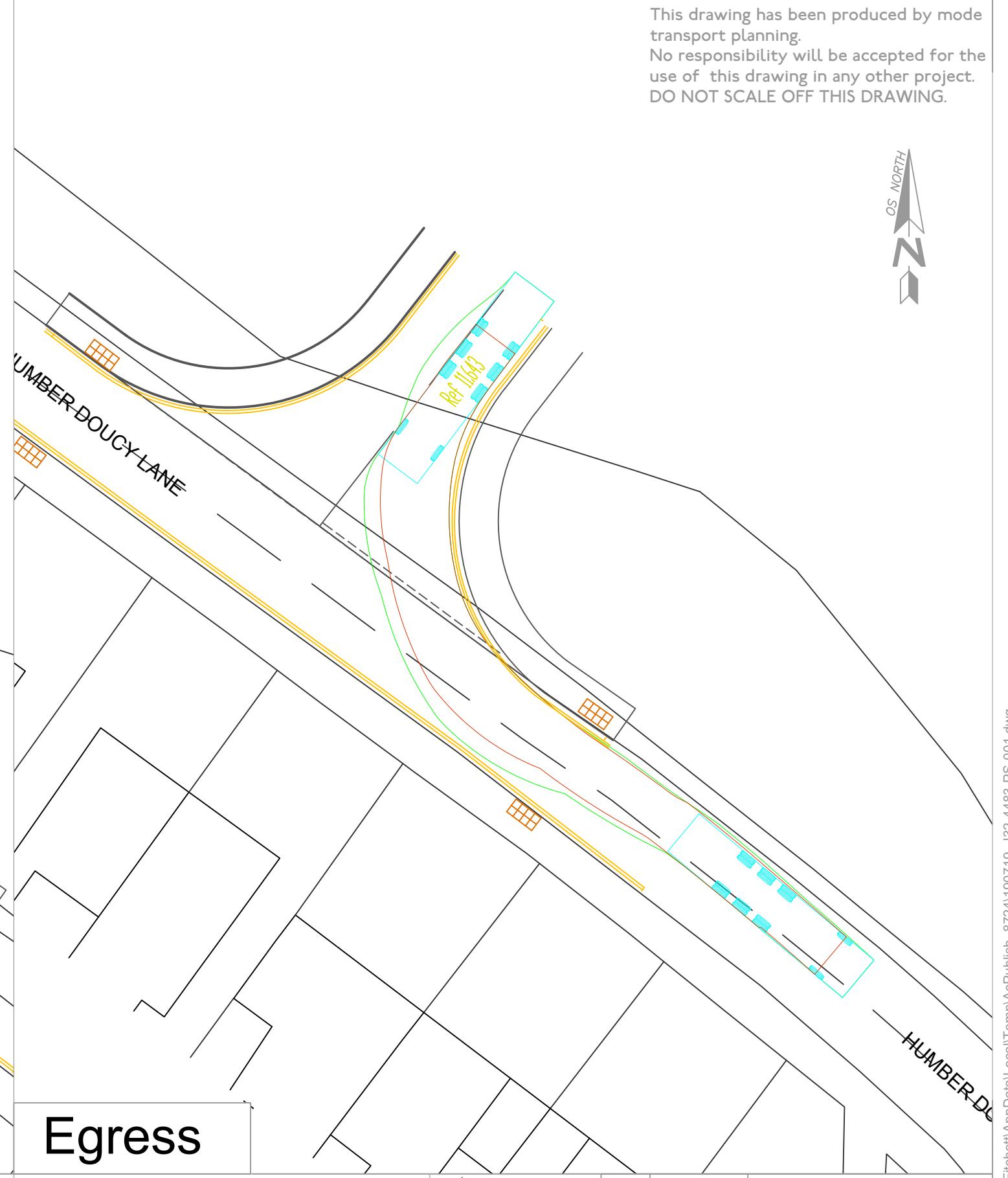


client

Bloor Homes

job title

Land off Humber Doucy Lane, Ipswich



## Egress

mode transport planning

LABS Atrium  
Stables Market  
Chalk Farm Road  
London  
NW1 8AH

t 020 7293 0217  
e info@modetransport.co.uk  
w www.modetransport.co.uk

mode  
transport planning

scale 1:250@A3

drawn

mf

A

21-02-20  
31-07-19

Revised Footway  
Issued

checked

pt

A

21-02-20  
31-07-19

Revised Footway  
Issued

created

July 19

Revised Footway  
Issued

J32-4483-PS-002

# APPENDIX A - Site Access Modelling results

<b>Junctions 9</b>								
<b>PICADY 9 - Priority Intersection Module</b>								
Version: 9.0.2.5947								
© Copyright TRL Limited, 2017								
For sales and distribution information, program advice and maintenance, contact TRL: +44 (0)1344 770558 software@trl.co.uk www.trlsoftware.co.uk								
<b>The users of this computer program for the solution of an engineering problem are in no way relieved of their responsibility for the correctness of the solution</b>								

**Filename:** 190724\_Site Access.j9

**Path:** C:\Users\Mode\Dropbox (mode)\Project\London\2. Projects\J324483\_Humber Doucy Lane, Ipswich\4. Data

**Report generation date:** 01/08/2019 12:48:52

- » 2019 + Dev, AM
- » 2019 + Dev, PM
- » 2024 + Dev, AM
- » 2024 + Dev, PM
- » 2036 + Dev, AM
- » 2036 + Dev, PM

#### Summary of junction performance

	AM				PM			
	Queue (Veh)	Delay (s)	RFC	LOS	Queue (Veh)	Delay (s)	RFC	LOS
<b>2019 + Dev</b>								
Stream B-C	0.1	7.58	0.08	A	0.0	6.86	0.03	A
Stream B-A	0.0	11.23	0.02	B	0.0	10.28	0.01	B
Stream C-AB	0.0	5.10	0.03	A	0.1	5.69	0.08	A
<b>2024 + Dev</b>								
Stream B-C	0.1	7.56	0.08	A	0.0	6.92	0.03	A
Stream B-A	0.0	11.47	0.02	B	0.0	10.51	0.01	B
Stream C-AB	0.0	4.91	0.04	A	0.1	5.63	0.08	A
<b>2036 + Dev</b>								
Stream B-C	0.1	7.68	0.08	A	0.0	7.01	0.03	A
Stream B-A	0.0	11.90	0.02	B	0.0	10.77	0.01	B
Stream C-AB	0.1	4.84	0.04	A	0.1	5.59	0.08	A

There are warnings associated with one or more model runs - see the 'Data Errors and Warnings' tables for each Analysis or Demand Set.

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

## File summary

### File Description

<b>Title</b>	
<b>Location</b>	
<b>Site number</b>	
<b>Date</b>	24/07/2019
<b>Version</b>	
<b>Status</b>	(new file)
<b>Identifier</b>	
<b>Client</b>	
<b>Jobnumber</b>	
<b>Enumerator</b>	DESKTOP-CE95GQI\ModeT
<b>Description</b>	

## Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	Veh	Veh	perHour	s	-Min	perMin

## Analysis Options

Vehicle length (m)	Calculate Queue Percentiles	Calculate detailed queueing delay	Calculate residual capacity	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
5.75				0.85	36.00	20.00

## Demand Set Summary

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D3	2019 + Dev	AM	ONE HOUR	07:45	09:15	15	✓
D4	2019 + Dev	PM	ONE HOUR	16:45	18:15	15	✓
D5	2024 + Dev	AM	ONE HOUR	07:45	09:15	15	✓
D6	2024 + Dev	PM	ONE HOUR	16:45	18:15	15	✓
D7	2036 + Dev	AM	ONE HOUR	07:45	09:15	15	✓
D8	2036 + Dev	PM	ONE HOUR	16:45	18:15	15	✓

## Analysis Set Details

ID	Include in report	Network flow scaling factor (%)	Network capacity scaling factor (%)
A1	✓	100.000	100.000

# 2019 + Dev, AM

## Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	B - Site Access - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.
Warning	Major arm width	C - Humber Doucy Lane (S) - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

## Results

### Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/hr)	Total Junction Arrivals (Veh)
B-C	0.08	7.58	0.1	A	35	52
B-A	0.02	11.23	0.0	B	6	8
C-AB	0.03	5.10	0.0	A	20	30
C-A					248	372
A-B					2	3
A-C					281	421

### Main Results for each time segment

#### 07:45 - 08:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	29	7	544	0.053	28	0.0	0.1	6.984	A
B-A	5	1	364	0.012	4	0.0	0.0	9.998	A
C-AB	15	4	722	0.021	15	0.0	0.0	5.093	A
C-A	205	51			205				
A-B	2	0.38			2				
A-C	230	58			230				

#### 08:00 - 08:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	34	9	532	0.064	34	0.1	0.1	7.225	A
B-A	5	1	349	0.015	5	0.0	0.0	10.481	B
C-AB	19	5	739	0.026	19	0.0	0.0	4.998	A
C-A	243	61			243				
A-B	2	0.45			2				
A-C	275	69			275				

**08:15 - 08:30**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	42	10	517	0.081	42	0.1	0.1	7.577	A
B-A	7	2	327	0.020	7	0.0	0.0	11.228	B
C-AB	26	6	764	0.034	26	0.0	0.0	4.874	A
C-A	296	74			296				
A-B	2	0.55			2				
A-C	337	84			337				

**08:30 - 08:45**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	42	10	517	0.081	42	0.1	0.1	7.578	A
B-A	7	2	327	0.020	7	0.0	0.0	11.229	B
C-AB	26	6	764	0.034	26	0.0	0.0	4.876	A
C-A	296	74			296				
A-B	2	0.55			2				
A-C	337	84			337				

**08:45 - 09:00**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	34	9	532	0.064	34	0.1	0.1	7.227	A
B-A	5	1	349	0.015	5	0.0	0.0	10.484	B
C-AB	19	5	739	0.026	19	0.0	0.0	5.002	A
C-A	243	61			243				
A-B	2	0.45			2				
A-C	275	69			275				

**09:00 - 09:15**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	29	7	544	0.053	29	0.1	0.1	6.992	A
B-A	5	1	364	0.012	5	0.0	0.0	10.000	B
C-AB	15	4	722	0.021	15	0.0	0.0	5.097	A
C-A	205	51			205				
A-B	2	0.38			2				
A-C	230	58			230				

# 2019 + Dev, PM

## Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	B - Site Access - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.
Warning	Major arm width	C - Humber Doucy Lane (S) - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

## Results

### Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/hr)	Total Junction Arrivals (Veh)
B-C	0.03	6.86	0.0	A	14	21
B-A	0.01	10.28	0.0	B	3	4
C-AB	0.08	5.69	0.1	A	41	62
C-A					180	270
A-B					5	7
A-C					211	317

### Main Results for each time segment

#### 16:45 - 17:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	11	3	562	0.020	11	0.0	0.0	6.540	A
B-A	2	0.56	385	0.006	2	0.0	0.0	9.409	A
C-AB	32	8	663	0.048	31	0.0	0.1	5.695	A
C-A	150	37			150				
A-B	4	1			4				
A-C	173	43			173				

#### 17:00 - 17:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	13	3	553	0.024	13	0.0	0.0	6.669	A
B-A	3	0.67	372	0.007	3	0.0	0.0	9.755	A
C-AB	40	10	677	0.059	40	0.1	0.1	5.657	A
C-A	177	44			177				
A-B	4	1			4				
A-C	207	52			207				

**17:15 - 17:30**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	17	4	542	0.030	16	0.0	0.0	6.855	A
B-A	3	0.83	354	0.009	3	0.0	0.0	10.276	B
C-AB	53	13	696	0.076	53	0.1	0.1	5.603	A
C-A	213	53			213				
A-B	6	1			6				
A-C	253	63			253				

**17:30 - 17:45**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	17	4	542	0.031	17	0.0	0.0	6.855	A
B-A	3	0.83	354	0.009	3	0.0	0.0	10.276	B
C-AB	53	13	696	0.076	53	0.1	0.1	5.596	A
C-A	213	53			213				
A-B	6	1			6				
A-C	253	63			253				

**17:45 - 18:00**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	13	3	553	0.024	14	0.0	0.0	6.672	A
B-A	3	0.67	372	0.007	3	0.0	0.0	9.758	A
C-AB	40	10	677	0.059	40	0.1	0.1	5.647	A
C-A	177	44			177				
A-B	4	1			4				
A-C	207	52			207				

**18:00 - 18:15**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	11	3	562	0.020	11	0.0	0.0	6.541	A
B-A	2	0.56	385	0.006	2	0.0	0.0	9.413	A
C-AB	32	8	664	0.048	32	0.1	0.1	5.693	A
C-A	150	37			150				
A-B	4	1			4				
A-C	173	43			173				

# 2024 + Dev, AM

## Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	B - Site Access - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.
Warning	Major arm width	C - Humber Doucy Lane (S) - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

## Results

### Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/hr)	Total Junction Arrivals (Veh)
B-C	0.08	7.56	0.1	A	35	52
B-A	0.02	11.47	0.0	B	6	8
C-AB	0.04	4.91	0.0	A	22	32
C-A					295	443
A-B					2	3
A-C					276	414

### Main Results for each time segment

#### 07:45 - 08:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	29	7	544	0.053	28	0.0	0.1	6.972	A
B-A	5	1	360	0.013	4	0.0	0.0	10.127	B
C-AB	16	4	749	0.021	16	0.0	0.0	4.907	A
C-A	244	61			244				
A-B	2	0.38			2				
A-C	227	57			227				

#### 08:00 - 08:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	34	9	533	0.064	34	0.1	0.1	7.210	A
B-A	5	1	343	0.016	5	0.0	0.0	10.650	B
C-AB	21	5	772	0.027	20	0.0	0.0	4.786	A
C-A	290	72			290				
A-B	2	0.45			2				
A-C	271	68			271				

**08:15 - 08:30**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	42	10	518	0.081	42	0.1	0.1	7.557	A
B-A	7	2	321	0.021	7	0.0	0.0	11.468	B
C-AB	28	7	805	0.035	28	0.0	0.0	4.630	A
C-A	352	88			352				
A-B	2	0.55			2				
A-C	331	83			331				

**08:30 - 08:45**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	42	10	518	0.081	42	0.1	0.1	7.558	A
B-A	7	2	321	0.021	7	0.0	0.0	11.468	B
C-AB	28	7	805	0.035	28	0.0	0.0	4.632	A
C-A	352	88			352				
A-B	2	0.55			2				
A-C	331	83			331				

**08:45 - 09:00**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	34	9	533	0.064	34	0.1	0.1	7.215	A
B-A	5	1	343	0.016	5	0.0	0.0	10.653	B
C-AB	21	5	772	0.027	21	0.0	0.0	4.790	A
C-A	290	72			290				
A-B	2	0.45			2				
A-C	271	68			271				

**09:00 - 09:15**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	29	7	544	0.053	29	0.1	0.1	6.980	A
B-A	5	1	360	0.013	5	0.0	0.0	10.129	B
C-AB	16	4	749	0.021	16	0.0	0.0	4.909	A
C-A	244	61			244				
A-B	2	0.38			2				
A-C	227	57			227				

# 2024 + Dev, PM

## Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	B - Site Access - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.
Warning	Major arm width	C - Humber Doucy Lane (S) - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

## Results

### Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/hr)	Total Junction Arrivals (Veh)
B-C	0.03	6.92	0.0	A	14	21
B-A	0.01	10.51	0.0	B	3	4
C-AB	0.08	5.63	0.1	A	43	64
C-A					197	296
A-B					5	7
A-C					228	343

### Main Results for each time segment

#### 16:45 - 17:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	11	3	558	0.020	11	0.0	0.0	6.581	A
B-A	2	0.56	380	0.006	2	0.0	0.0	9.540	A
C-AB	32	8	671	0.048	32	0.0	0.1	5.634	A
C-A	165	41			165				
A-B	4	1			4				
A-C	187	47			187				

#### 17:00 - 17:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	13	3	549	0.025	13	0.0	0.0	6.720	A
B-A	3	0.67	365	0.007	3	0.0	0.0	9.924	A
C-AB	41	10	686	0.060	41	0.1	0.1	5.585	A
C-A	194	49			194				
A-B	4	1			4				
A-C	224	56			224				

**17:15 - 17:30**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	17	4	536	0.031	16	0.0	0.0	6.922	A
B-A	3	0.83	346	0.010	3	0.0	0.0	10.507	B
C-AB	55	14	708	0.078	55	0.1	0.1	5.519	A
C-A	233	58			233				
A-B	6	1			6				
A-C	274	69			274				

**17:30 - 17:45**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	17	4	536	0.031	17	0.0	0.0	6.922	A
B-A	3	0.83	346	0.010	3	0.0	0.0	10.507	B
C-AB	55	14	708	0.078	55	0.1	0.1	5.517	A
C-A	233	58			233				
A-B	6	1			6				
A-C	274	69			274				

**17:45 - 18:00**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	13	3	549	0.025	14	0.0	0.0	6.721	A
B-A	3	0.67	365	0.007	3	0.0	0.0	9.927	A
C-AB	41	10	687	0.060	41	0.1	0.1	5.574	A
C-A	194	49			194				
A-B	4	1			4				
A-C	224	56			224				

**18:00 - 18:15**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	11	3	558	0.020	11	0.0	0.0	6.585	A
B-A	2	0.56	380	0.006	2	0.0	0.0	9.542	A
C-AB	33	8	671	0.049	33	0.1	0.1	5.634	A
C-A	165	41			165				
A-B	4	1			4				
A-C	187	47			187				

# 2036 + Dev, AM

## Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	B - Site Access - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.
Warning	Major arm width	C - Humber Doucy Lane (S) - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

## Results

### Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/hr)	Total Junction Arrivals (Veh)
B-C	0.08	7.68	0.1	A	35	52
B-A	0.02	11.90	0.0	B	6	8
C-AB	0.04	4.84	0.1	A	23	34
C-A					323	485
A-B					2	3
A-C					302	453

### Main Results for each time segment

#### 07:45 - 08:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	29	7	539	0.053	28	0.0	0.1	7.042	A
B-A	5	1	352	0.013	4	0.0	0.0	10.351	B
C-AB	16	4	761	0.022	16	0.0	0.0	4.835	A
C-A	267	67			267				
A-B	2	0.38			2				
A-C	248	62			248				

#### 08:00 - 08:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	34	9	527	0.065	34	0.1	0.1	7.299	A
B-A	5	1	334	0.016	5	0.0	0.0	10.948	B
C-AB	22	5	787	0.027	22	0.0	0.0	4.703	A
C-A	317	79			317				
A-B	2	0.45			2				
A-C	296	74			296				

**08:15 - 08:30**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	42	10	511	0.082	42	0.1	0.1	7.678	A
B-A	7	2	309	0.021	7	0.0	0.0	11.895	B
C-AB	30	8	824	0.036	30	0.0	0.0	4.534	A
C-A	385	96			385				
A-B	2	0.55			2				
A-C	362	91			362				

**08:30 - 08:45**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	42	10	511	0.082	42	0.1	0.1	7.678	A
B-A	7	2	309	0.021	7	0.0	0.0	11.895	B
C-AB	30	8	824	0.036	30	0.0	0.1	4.536	A
C-A	385	96			385				
A-B	2	0.55			2				
A-C	362	91			362				

**08:45 - 09:00**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	34	9	527	0.065	34	0.1	0.1	7.302	A
B-A	5	1	334	0.016	5	0.0	0.0	10.952	B
C-AB	22	5	787	0.027	22	0.1	0.0	4.707	A
C-A	317	79			317				
A-B	2	0.45			2				
A-C	296	74			296				

**09:00 - 09:15**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	29	7	539	0.053	29	0.1	0.1	7.049	A
B-A	5	1	352	0.013	5	0.0	0.0	10.356	B
C-AB	16	4	761	0.022	17	0.0	0.0	4.837	A
C-A	267	67			267				
A-B	2	0.38			2				
A-C	248	62			248				

# 2036 + Dev, PM

## Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	B - Site Access - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.
Warning	Major arm width	C - Humber Doucy Lane (S) - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

## Results

### Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/hr)	Total Junction Arrivals (Veh)
B-C	0.03	7.01	0.0	A	14	21
B-A	0.01	10.77	0.0	B	3	4
C-AB	0.08	5.59	0.1	A	44	67
C-A					213	319
A-B					5	7
A-C					251	376

### Main Results for each time segment

#### 16:45 - 17:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	11	3	554	0.020	11	0.0	0.0	6.635	A
B-A	2	0.56	374	0.006	2	0.0	0.0	9.688	A
C-AB	33	8	677	0.049	33	0.0	0.1	5.593	A
C-A	178	44			178				
A-B	4	1			4				
A-C	206	51			206				

#### 17:00 - 17:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	13	3	544	0.025	13	0.0	0.0	6.787	A
B-A	3	0.67	359	0.008	3	0.0	0.0	10.116	B
C-AB	43	11	693	0.061	42	0.1	0.1	5.538	A
C-A	209	52			209				
A-B	4	1			4				
A-C	245	61			245				

**17:15 - 17:30**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	17	4	530	0.031	16	0.0	0.0	7.009	A
B-A	3	0.83	337	0.010	3	0.0	0.0	10.772	B
C-AB	57	14	717	0.080	57	0.1	0.1	5.468	A
C-A	251	63			251				
A-B	6	1			6				
A-C	301	75			301				

**17:30 - 17:45**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	17	4	530	0.031	17	0.0	0.0	7.009	A
B-A	3	0.83	337	0.010	3	0.0	0.0	10.773	B
C-AB	57	14	717	0.080	57	0.1	0.1	5.463	A
C-A	251	63			251				
A-B	6	1			6				
A-C	301	75			301				

**17:45 - 18:00**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	13	3	544	0.025	14	0.0	0.0	6.788	A
B-A	3	0.67	358	0.008	3	0.0	0.0	10.120	B
C-AB	43	11	693	0.061	43	0.1	0.1	5.530	A
C-A	209	52			209				
A-B	4	1			4				
A-C	245	61			245				

**18:00 - 18:15**

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	11	3	554	0.020	11	0.0	0.0	6.638	A
B-A	2	0.56	374	0.006	2	0.0	0.0	9.692	A
C-AB	33	8	677	0.049	33	0.1	0.1	5.591	A
C-A	177	44			177				
A-B	4	1			4				
A-C	206	51			206				



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## **Appendix F**

## Sustainability Appraisal Concerns

- 1.1 The preparation of a Sustainability Appraisal to inform the Local Plan is a legal requirement, as per the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations').
- 1.2 Furthermore, the NPPF makes clear (paragraph 32) that Local Plans should be informed by a Sustainability Appraisal that meets the relevant legal requirements; and that this should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains).
- 1.3 Requirements of the SEA Regulations include the need to explain why options have been selected, and alternatives rejected; and to appraise options to the same level of detail.
- 1.4 The emerging Ipswich Local Plan is accompanied by a Sustainability Appraisal ('the SA/SEA').
- 1.5 The SA acknowledges (Section 3, paragraph xxxvi) that the Spatial Strategy proposed in the Local Plan is a combination of several of the Spatial Options, but mostly aligns with Spatial Option 1.
- 1.6 Firstly, whilst it could be said that the spatial strategy the emerging Local Plan proposes resembles Spatial Option 1 more than the other options appraised, it is not Spatial Option 1. As such, the SA does not appear to have assessed the spatial strategy within the emerging Local Plan in a manner that enables comparison to reasonable alternatives.
- 1.7 Further to this, it is problematic that the commentary in Table 2 of the SA (which seeks to explain the reason for the selection of options and the rejection of alternatives – a requirement of the SEA Regulations) refers to Spatial Option 1 as having been the option selected. This of course contradicts earlier commentary within the SA, which confirms the selected option merely most closely resembles Option 1 relative to other options appraised.

- 1.8 Turning to the appraisal of the Spatial Options against the SA objectives, we have a number of concerns and comments in relation to how Spatial Option 1 and Spatial Option 2 (increased development beyond the Borough boundary) are assessed, as set out below.

**SA Objective 2 (to meet the housing requirements of the whole community)**

- 1.9 In respect of Spatial Option 1 (Higher-density urban regeneration), the SA/SEA suggests that this will have a minor positive impact on SA objective 2. It merits emphasising that this SA objective refers to meeting the housing requirements of the whole community. However, nowhere within the appraisal of this option does it appear to have considered the differing housing needs of the community, and the implications for these of pursuing this option. Instead, it appears to have simply focused on the quantum of development, without considering the type. Even prior to considering this issue, the appraisal identifies concerns in relation to this option, noting that it is unlikely to meet needs on its own. We consider that such an option in focussing on higher-density urban regeneration is unlikely to meet the housing needs of all, and would result in a narrow range of types of homes being delivered, skewed heavily towards smaller, flatted accommodation. This may disadvantage those requiring larger, family homes; as well as those in need of specialist accommodation. The SA should recognise this, and the scoring adjusted accordingly.
- 1.10 In respect of Spatial Option 2, we agree that increased development beyond the Borough boundary would have a major positive effect in relation to SA objective 2. In addition, and to assist a decision-maker in comparing this with alternative options, it should be recognised that through this approach there are far greater prospects that a variety of forms of housing and accommodation will be provided which meet the needs of all of the community, including through provision of affordable housing and specialist accommodation.

**SA Objective 5 (to improve levels of education and skills in the population overall)**

- 1.11 In respect of Spatial Option 1 and SA objective 5, the appraisal notes that future residents in these locations would likely have good access to education services. It

should be recognised that all school-aged people in the Borough should have access to education, regardless of proximity to educational facilities. Ability to access educational facilities without reliance on a private car is of relevance to the SA/SEA (SA objective 18), but not SA objective 5.

- 1.12 The assessment of Spatial Option 1 against SA objective 5 goes on to suggest the option may result in capacity concerns in some locations. However, despite identifying what would appear to be a significant issue in relation to this SA objective, Spatial Option 1 is still given a score of minor positive in relation to this.
- 1.13 In respect of Spatial Option 2, the appraisal recognises that this approach is likely to engender fewer capacity concerns. However, it also states that access to education services in these locations may well be more limited. We consider that access is highly unlikely to be so difficult as to constitute a negative impact in relation to this particular SA objective. Again, it is more relevant to SA objective 18. As Spatial Option 2 is assessed as having a minor negative impact in relation to promoting sustainable travel, the scoring of this SA objective as a minor negative for the same reasons is, in effect, double-counting this one issue.

#### **SA Objective 11 (to reduce vulnerability to climatic events and flooding)**

- 1.14 The SA/SEA assesses Spatial Option 2 as having a minor negative impact on this SA objective, explaining that fluvial flood risk is present in and around Ipswich. It makes reference to there being areas of fluvial flood risk to the north of Ipswich.
- 1.15 In actual fact, the Environment Agency flood mapping shows that the greatest areas of Flood Zone 2/3 are located within Ipswich itself (and as such, relevant to Spatial Option 1); and to the south of Ipswich. Areas of Flood Zone 2/3 to the north are very limited. The vast majority of land to the north of Ipswich is Flood Zone 1 – land least at risk of flooding from tidal or fluvial sources. Certainly, a significant quantum of development could be accommodated to the north or east of Ipswich without having to develop land in Flood Zone 2/3. The SA/SEA's conclusion on Spatial Option 2's impact on SA objective 11 is, in our view, reliant on entirely specious reasoning.

**SA objective 12 (safeguard the integrity of the coast and estuaries)**

- 1.16 In relation to SA objective 12 (safeguard the integrity of the coast and estuaries), the appraisal scored Option 1 as a minor positive, and justifies this by stating:

*"Option 1 would situate nearly all new development within urban locations and it is therefore unlikely that it would adversely affect the coast or estuaries. However, it would also not provide an opportunity to enhance the setting or character of the coast and estuaries".*

- 1.17 This appraisal completely overlooks that large sections of the Suffolk coast comprise Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites which are vulnerable to recreational disturbance. Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils ('the Suffolk RAMS') confirms that the entirety of Ipswich Borough is within the Zone of Influence of European sites, i.e. it can be expected that, without mitigation measures, residents of Ipswich Borough will visit these European sites.
- 1.18 Whilst it is recognised that higher density development located within existing urban areas may be able to make financial contributions towards mitigation, their ability to incorporate Suitable Alternative Natural Greenspaces (SANGs) will of course be extremely limited.
- 1.19 In respect of Spatial Option 2 and SA objective 12, the appraisal states:

*"Situating development in the rural areas could make it difficult to avoid adverse impacts on the coast and estuaries in all cases, including the biodiversity value, sensitive landscapes and heritage value prevalent here. This would be particularly the case if a new settlement were delivered."*

- 1.20 It concludes that there would be a minor negative impact.
- 1.21 We consider the SA's appraisal of Spatial Option 2 in relation to this SA objective to be wholly misconceived.

- 1.22 As noted above, the entirety of Ipswich Borough is within the Zone of Influence of the coastal SPAs, SACs and Ramsar sites. As such, development beyond the Borough boundary would be no more within the Zone of Influence than development within it. Development beyond the boundary is highly unlikely to have a direct impact (as in, encroach into any of the protected areas) on any of the estuaries or coasts, as, with the exception of the Stour and Orwell Estuaries SPA/Ramsar site, none of the estuaries or coastal areas are within such proximity to the Borough such that increased development beyond the Borough boundary would feasibly encroach into such areas. In any case, the Stour and Orwell Estuaries only has potential to be directly impacted by development to the south of the Borough.
- 1.23 The option of increased development beyond the Borough boundary has potential to incorporate SANGS and to reduce recreational disturbance of the European sites, not simply from future residents of the development, but also from existing residents within the locality. Spatial Option 2 should be seen as having a positive impact on this SA objective when compared to alternatives.

**SA objective 13 (to conserve and enhance biodiversity and geodiversity)**

- 1.24 Turning to SA objective 13 the appraisal in relation to this appears to be based on the misconception that greenfield land is inherently of ecological value. This is not the case. Indeed, intensively farmed agricultural land is generally of negligible ecological value, and such the ecological value of land can often be enhanced through its development.
- 1.25 In relation to Spatial Option 1, despite the appraisal text noting that it may be difficult to incorporate high quality green infrastructure into high-density, urban development, it fails to reflect this in the scoring of this option.
- 1.26 Furthermore, the text on Spatial Option 1 makes reference to landscape designations. This is an entirely different matter to biodiversity, one unrelated to this SA objective.
- 1.27 In respect of Spatial Option 2, in addition to the aforementioned flawed assumption that greenfield land is of ecological value, we note that the text notes the potential positive effects of this approach with low density development giving rise to opportunities for

ecological enhancements. However, the scoring (minor negative) does not reflect this positive effect.

**SA objective 14 (to conserve and where appropriate enhance areas and assets of historical and archaeological importance)**

- 1.28 In relation Spatial Option 1 and this SA objective, the appraisal text identifies the potential negative effects, stating as follows:

*“Should taller buildings be required to meet the higher density requirements, there is greater potential for development to have an adverse impact on long-distance views and to discord with the local character. A large quantity of cultural heritage assets, including Listed Buildings, Scheduled Monuments and Conservation Areas, are situated within the urban areas of Ipswich, the setting of which could be adversely impacted by any nearby high-density developments or tall buildings”.*

- 1.29 Notwithstanding this wholly negative assessment provided by the SA/SEA in relation to SA objective 14, the option is inexplicably scored as a positive / negative impact, rather than minor negative or major negative.
- 1.30 Spatial Option 2 is assessed as having a positive / negative effect on SA objective 14. However, from the commentary, it is clear that the negative impact relates to perceived concerns regarding harm to the character of rural locations.
- 1.31 Firstly, this is not an issue that is relevant to SA objective 14. This is more a matter for SA objective 15.
- 1.32 Secondly, and in any case, we do not agree with the statement that “where development takes place in rural locations it is more likely to discord with the local character and adverse impacts may be more likely”. On the contrary, it should be recognised that planning policies can, and more often than not do, insist that development responds positively to local character and context, including in rural areas. Development need not have an intrinsically harmful impact on the character of small settlements, as the SA/SEA appears to imply here.

**SA Objective 15 (to conserve and enhance the quality and local distinctiveness of landscapes and townscape)**

- 1.33 In relation to this SA objective and Spatial Option 1, the appraisal states that:

*"With most development taking place in urban areas, it is uncertain the extent to which high density development might discord with the local townscape character".*

- 1.34 We consider that a strategy wholly reliant on higher density development will, necessarily, result in negative impacts on the townscape. It should be recognised that Ipswich is not currently characterised by high density development, and such an approach would be very much at odds with the existing character of much of the Borough.
- 1.35 As such, we consider the assessment of Spatial Option 1 against SA objective 15 as a minor positive is unjustified.
- 1.36 In relation to Spatial Option 2, this is assessed as having a major negative impact on this SA objective. However, from the text it appears that the SA/SEA has failed to acknowledge that harm to the landscape can be mitigated and that there are likely to be a number of opportunities to provide development in locations which are not sensitive in landscape terms.
- 1.37 Furthermore, the appraisal of Spatial Option 2 in relation to this SA objective appears to have entirely overlooked the issue of townscape, instead focussing solely on landscape. It should be recognised that Spatial Option 2 will have a positive impact on landscape, by virtue of avoiding having to rely on increasing densities within the existing settlement.

**SA Objective 16 (to achieve sustainable levels of prosperity and growth throughout the plan area)**

- 1.38 In relation to SA objective 16, the appraisal of Spatial Option 1 identifies the potential harm of this approach to nearby market towns, but the scoring against this objective (major positive) does not reflect this concern.

## Conclusion

- 1.39 As noted earlier, the Sustainability Appraisal is an important component of the Local Plan, and plays a key role in justifying the approach taken, as well as the options rejected.
- 1.40 The SA which accompanies the emerging Local Plan at this stage gives rise to a number of concerns, particularly in relation to how the selected option has been assessed (if at all), and the robustness of the assessment which resulted in it being selected and alternatives rejected.
- 1.41 In particular, the issues identified above in relation to numerous SA objectives have resulted in the Spatial Option 1 being assessed as being far more positive than should be the case.
- 1.42 Conversely, there are numerous instances where a flawed approach to assessment of Spatial Option 2 has resulted in it being assessed as unduly negative.
- 1.43 A such, the SA prepared alongside the emerging Local Plan (Regulation 19) does not provide the necessary justification of the strategy proposed by the emerging Local Plan.
- 1.44 Once the appraisal is updated to address the above, the Council should review whether the strategy it proposes is suitable; and whether the reason for rejecting alternatives is still applicable.

**Felicia Blake**

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**From:** Catherine Abbott  
**Sent:** 18 February 2020 07:30  
**To:** Felicia Blake  
**Subject:** FW: CC175705244: Comment Received  
**Attachments:** CC175705244 - Comment.pdf

Fel

This one relates to the local plan

Thanks

Kind Regards

Catherine Abbott  
Senior Administration Officer  
Planning & Development  
Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1 2DE

---

**From:** Ipswich Borough Council <noreply@ipswich.gov.uk>

**Sent:** 17 February 2020 20:37

**To:**

**Subject:** CC175705244: Comment Received

# MY IPSWICH

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Ref No: CC175705244

---

Dear Colleague,

A customer has submitted an online 'Comment' form for your service area. Please find the details of the 'Comment' listed below and also on the attached PDF which can be saved for your service records.

---

Service area: Planning & Development

**Comment:** I object to the proposed site allocation ip061 for housing.

The green field is an important wildlife stepping stone and is used by the local residents for leisure which is a benefit to fitness, social interaction and mental well being. Lavenham road and kelly road can not support the extra traffic this housing development would create if it went ahead. Already Kelly road and lavenham road are single roads due

to the sheer number of parked cars along it. Recently a heavily pregnant mum-to-be had to call out an ambulance which could not make its way to destination house due to parked cars blocking access. Amongst other wildlife present on the green (as highlighted in the suffolk wildlife trust report 2019) here are additional bats nesting in and around properties 201 to 215 and crane hall, these locations have not been picked up by the report, however, I will be approaching the national bat association to make sure they know of these locations.

---

#### **Customer Details**

**Email Address:** \_\_\_\_\_

---

#### **What you need to do next?**

- If you would like to add an internal note to the comment, i.e. if you have taken any action then please click [here](#).
  - Once you have added a note you will then receive an updated PDF including the notes you have added.
- 

**Kind Regards**

**Customer Services**

---

**\*\*\* THIS IS AN AUTOMATED EMAIL: This email address is unable to take replies \*\*\***

**Date and time of enquiry: 17/02/2020 20:36:35**

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**C**



**Felicia Blake**

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**From:** Nick Davey  
**Sent:** 02 March 2020 17:18  
**To:** PlanningPolicy  
**Subject:** Public Consultation for the Ipswich Local Plan Review Final Draft 15th January 2020 – 2nd March 2020  
**Attachments:** Local Plan Final Draft Comments Form.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir / Madam

We are pleased to attach comments, made on behalf of Cardinal Lofts (Mill) Ltd, in respect of the Ipswich Local Plan Review Final Draft.

We would be grateful for confirmation of receipt.

Regards

Nick Davey

W: [www.jtspartnership.co.uk](http://www.jtspartnership.co.uk)

THE JTS PARTNERSHIP LLP  
Number One, The Drive  
Brentwood, CM13 3DJ

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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Ipswich Final Draft Local Plan</b>
<b>Please return this comments form to:</b>	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

#### **PART A PERSONAL DETAILS**

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>		
<b>First name</b>		
<b>Last name</b>		
<b>Job title (where relevant)</b>		
<b>Organisation (where relevant)</b>	<b>Cardinal Lofts (Mill) Ltd</b>	<b>The JTS Partnership LLP</b>
<b>Address (Please include post code)</b>		<b>Number One The Drive Brentwood Essex CM13 3DJ</b>
<b>E-mail</b>		
<b>Telephone No.</b>		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	The JTS Partnership LLP on behalf of Cardinal Lofts (Mill) Ltd
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Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<b>Core Strategy and Policies Development Plan Document Review Final Draft &amp; Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft – Background.</b>	<p><b>Background</b></p> <p>Cardinal Lofts (Mill) Ltd owns the freehold, or has a major interest in, a number of sites (IP035: St Peter Port – IP206: Cranfields – IP211: Regatta Quay), which are all located in the Northern Quays area of the Waterfront. The Company has been talking to planning officers about potential future developments for some time and, in October 2018, it presented its emerging proposals for the St Peter Port site to the Council's Conservation and Design Panel.</p> <p>The successful development of the Company's site is key to delivering both a number of the Council's objectives for the Waterfront area (including the aim of improving north-south links between the Waterfront and the Town Centre) and the overall strategy of concentrating new development in the IP-One Area. The Company is, however, concerned that the emerging policies do not take into account the significant 'abnormal' costs of developing these sites (and, in particular, IP035) and will, therefore, render development financially unviable and, ultimately, non-deliverable. As such, the Final Draft is unsound.</p> <p>In March 2019, the Company made representations, in respect of both the preferred options draft Core Strategy and Site Allocations and Policies documents, seeking a greater degree of flexibility into those policies that will be directly material to any future application(s) that are brought forward for these sites. In addition to seeking recognition, within the emerging plans, that development needs to be profitable, in order to be undertaken, the Company specifically requested that the Borough Council:-</p> <ul style="list-style-type: none"> <li>• amend those policies relating to Site IP035 that restrict the height and density of development that may be achieved; and,</li> <li>• introduce a specific recognition that, in order to further the</li> </ul>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<p>development of all three sites, some parking provision should be made for new residents, which can only be located on-site IP035.</p> <p>Whilst the Council has accepted some of the suggestions, the Company is still concerned that the operation of the new Plan will potential frustrate the development of these sites. Accordingly, it is of the review the Final Draft is not sound.</p>
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 6: Vision and Objectives – Paragraphs 6.7 &amp; 6.8.</b>	<p><b>Vision &amp; Objectives</b></p> <p>The Company continues to support the general Vision as is set out at paragraph 6.7. It is also in general agreement with the Objectives (paragraph 6.8), but considers that there should be explicit recognition that, unless development is viable (or is subsidised from the public purse) it will not take place and the Vision will not, therefore, be achieved (and is unsound).</p> <p>Summary: Object for the reasons set out above. The inclusion of the word 'viable' needs to be added to Objective 4.</p>
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 6: The Spatial Strategy – Paragraphs 6.10 to 6.22.</b>	<p><b>The Spatial Strategy</b></p> <p>The Company offers its general support for the spatial strategy, as set out at paragraphs 6.10 to 6.22, and, in particular, the objective of focussing development in central Ipswich in order to tackle issues of deprivation and social exclusion (see also paragraph 6.8 - Objective 3).</p> <p>Summary: Support.</p>
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS2 and paras 8.53 to 8.67.</b>	<p><b>The Location and Nature of Development</b></p> <p>Policy CS2 gives expression to the Council's spatial strategy and its main principles are supported by the Company. In particular, the Company again notes the focus that is being placed upon the IP-One Area, where high-density development will be the norm.</p> <p>The Company notes, and welcomes, the changes made to criterion h of the policy, which is now consistent with the guidance set out in the NPPF.</p> <p>Summary: Support</p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Policy CS3</b>	<p><b>IP-One Area Action Plan</b></p> <p>The Company welcomes the change made to criterion c and the explicit recognition that guidance set out in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft may not always be the optimum way to develop a site.</p> <p><b>Summary:</b> Support</p>
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS5 and paras 8.92 to 8.98.</b>	<p><b>Improving Accessibility</b></p> <p>The Company generally welcomes, and supports, initiatives that are designed to minimise the need to travel and promote foot, bicycle and public transport travel modes.</p> <p>The Company also welcomes the recognition that some journeys will need to be made by car, however, it is disappointed that only the Town Centre is specifically mentioned as being a location, the vitality and viable of which, depends upon access by a variety of transport modes. The Company is of the view that, in order for the Final Draft to be found sound, this 'recognition' needs to be expanded to include the whole of the IP-One Area.</p> <p><b>Summary:</b> Object for the reasons set out above.</p>
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS8 and paras 8.113 to 8.125</b>	<p><b>Housing Type and Tenure</b></p> <p>The Company welcomes the acknowledgement that, in some cases, such as due to the high cost of development and 'abnormals' relating to a site, it may not always be viable to provide a full mix of dwelling types and sizes.</p> <p><b>Summary:</b> General support.</p>
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS12 and paras 8.150 to 8.163</b>	<p><b>Affordable Housing</b></p> <p>The Company welcomes the acknowledgement that, in some cases, such as due to the high cost of development and 'abnormals' relating to a site, it may not always be viable to provide full affordable housing provision.</p> <p>It is understood that the Council will shortly be progressing with its proposed Community Infrastructure Levy. This will place additional financial burdens upon development and, in some circumstances, reduce the amount of affordable housing that can be provided (on viability</p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<p>grounds).</p> <p><b>Summary:</b> General support.</p>
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS16 and paras 8.199 to 8.209.</b>	<p><b>Green Infrastructure, Sport and Recreation</b></p> <p>Whilst the Company generally supports the objectives of this policy, it considers that, in order for the Final Draft to be found sound, there should be an explicit recognition that, on high density sites within the IP-One Area, and particularly along the Waterfront, it will not be possible to make full provision for private, and public, open space, in accordance with the Council's standards. Open space is a very 'land hungry' use and, if developments have to meet full standards, densities will be greatly reduced. This could threaten the achievement of the Council's spatial strategy and result in new development not making the best, and most effective, use of previously developed sites.</p> <p><b>Summary:</b> Object for the reasons set out above.</p>
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 9: Policy DM6 and paras 9.6.1 to 9.6.9.</b>	<p><b>Provision of New Open Spaces, Sport and Recreation Facilities</b></p> <p>The Company's comments, in respect of this policy, follow on from those set out above in relation to Policy CS16. The Company again offers its general support to the objectives of the policy, but considers that, in order to be found sound, it needs to be more explicit in recognising that, on higher density, previously developed sites in the IP-One Area, and particularly on the Waterfront, it will not be possible to make full provision for open space in accordance with the Council's standards.</p> <p><b>Summary:</b> Object for the reasons set out above.</p>
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 9: Policy DM7 and paras 9.7.1 to 9.7.11</b>	<p><b>Provision of Private Outdoor Amenity Space in New and Existing Developments</b></p> <p>As with the comments relating to Policies CS16 and DM6, there should be explicit recognition that, in respect of high density, previously developed sites, it may not always be possible to make full provision for private amenity space to accord with the Council's standards.</p> <p><b>Summary:</b> Object for the reasons set out above.</p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 9: Policy DM13 and paras 9.13.1 to 9.13.26</b>	<b>Built Heritage &amp; Conservation</b>  The Company supports the general objectives set out in this policy and is satisfied with the revised wording of the policy, which better accords with the guidance set out in the NPPF.  Summary: General support.
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 9: Policy DM15 and paras 9.15.1 to 9.15.7 and IP-One Area Inset Policies Map.</b>	<b>Tall Buildings</b>  Whilst the Company generally supports the policy, it objects to the exclusion of Site IP035 from the 'arc of land', where tall buildings may be appropriate, as shown on the IP-One Area Inset Proposals Map.  The costs of developing Site IP035 are such that a high density development, potentially involving one, or more, 'tall buildings' will be required. The Council has granted planning permission (ref: 07/00555/FUL) to redevelop the site for mixed use purposes, with buildings ranging from 7 to 11 storeys in height and, since then, 'tall buildings' have been developed on a number of adjacent sites.  The policy, as currently worded, will potentially frustrate the development of this key Waterfront site and is, therefore, unsound. Impacts upon the setting of adjacent listed buildings, and other heritage assets, can be adequately addressed under Policy DM13.  Summary: Objection.
<b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 9: Policy DM22 and paras 9.22.1 to 9.22.8</b>	<b>Car and Cycle Parking in New Development</b>  The Company welcomes the recognition (para 9.21.6) that many people still own cars and that adequate levels of residential parking, that uses land efficiently and is well designed, needs to be provided as part of new residential schemes.  Summary: Support.
<b>Core Strategy and Policies Development Plan</b>	<b>The Density of Residential Development</b>  The Company welcomes the policy support for high densities of residential

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
<b>Document Review Final Draft – Chapter 9: Policy DM23 and paras 9.23.1 to 9.23.6</b>	<p>development in the Portman Quarter and Waterfront areas.</p> <p><b>Summary: Support.</b></p>
<b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 4: Policy SP2</b>	<p><b>Land Allocated for Housing</b></p> <p>The Company welcomes the identification of Site IP035 for development as a residential-led mixed-use scheme. It is, however, of the view that the site has a much greater capacity than is indicated in the policy – in fact, a much greater density, than that implied by the capacity figure, is required in order to make any form of development viable.</p> <p>As is acknowledged in the related Site Sheet (the status of which is not clear), Site IP035 is subject to a number of abnormal development costs, not the least being archaeology. A lot of information was collated, about the archaeological potential of the site, in connection with the submission, and grant of planning permission, under reference 07/00555/FUL. The site is known to be of high archaeological potential and the cost of full archaeological excavation and recording was costed at £1.3 million (plus or minus 50%) and was estimated to take 12 months (plus or minus 50%), in 2008. Given the uncertainty surrounding both the cost, and timescale for, archaeological excavation, and the financial crash of 2008/2009, it proved impossible to raise the necessary finance to fund the development.</p> <p>The site is also subject to a number of other abnormalities, which include the following.</p> <ul style="list-style-type: none"> <li>• <b>Hydrology:</b> There are a number of water channels running under the site (it lies on the route of the former Lower Brook Street) and there are concerns that archaeological excavation could change the hydrology of the site and thus impact upon the structural integrity of the two listed adjacent churches. Accordingly, there is a requirement for the condition of the churches to be monitored, throughout the excavation process, with a £250k cash bond (in 2008) being required in order to insure against any damage.</li> <li>• <b>Numbers 1-5 College Street:</b> The listed buildings that lie within the site are in a very poor state of repair and £500k has recently had to be spent on them to make them wind and watertight. They cannot be insured (as they are currently empty) and the cost of the works</li> </ul>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)																		
	<p>already carried out has to be recovered from any future development.</p> <ul style="list-style-type: none"> <li>• <b>Land Contamination:</b> There is a 'backfilled' pit on the site and the cost of remediation works have been put at over £100k.</li> <li>• <b>Sustainable Urban Drainage:</b> The site lies within Flood Zone 2/3, with the water table being very close to the surface. Accordingly, SUDS measures have to be above ground, which adds in the order of £500k, over and above the cost of installing a 'traditional' SUDS scheme, to development costs.</li> <li>• <b>Air Quality:</b> The site is surrounded by the heavily trafficked Star Lane gyratory system and the additional costs of air quality mitigation measures are put at £500k.</li> <li>• <b>Design:</b> the site lies between two listed churches and adjacent to the Wet Dock Conservation Area. As a result, a high standard of design will be required, which it is anticipated will add up to 20% to normal build costs.</li> </ul> <p>The following table summarises the abnormal costs (i.e. those over and above developing the 'average' brownfield' site) and compares the option of dealing with archaeological issues via excavation and recording (which cannot be financed due to the uncertainties involved) or via the construction of an above ground raft, upon which the development will sit (so preserving the archaeology in-situ).</p> <p>Whichever route is chosen, the costs of developing this site are very high and, in order to be justified, a much higher number of dwellings, and a greater density, than is indicated in Policy SP2 needs to be provided.</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <tr> <td colspan="3"><b>ST PETER PORT</b></td></tr> <tr> <td colspan="3"><b>ABNORMAL* COST OF DEVELOPMENT</b></td></tr> <tr> <td></td> <td><b>Excavate and Record</b></td> <td><b>Raft Slab</b></td></tr> <tr> <td><b>ARCHAEOLOGY</b></td> <td></td> <td></td></tr> <tr> <td><b>Excavations</b></td> <td>£2,500,000</td> <td></td></tr> <tr> <td><b>Construction Cost</b></td> <td>£500,000</td> <td>£2,000,000</td></tr> </table>	<b>ST PETER PORT</b>			<b>ABNORMAL* COST OF DEVELOPMENT</b>				<b>Excavate and Record</b>	<b>Raft Slab</b>	<b>ARCHAEOLOGY</b>			<b>Excavations</b>	£2,500,000		<b>Construction Cost</b>	£500,000	£2,000,000
<b>ST PETER PORT</b>																			
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<b>Construction Cost</b>	£500,000	£2,000,000																	

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>		
	<b>Risk Insurance for Adjacent Buildings</b>	<b>£250,000</b>	
	<b>Additional Interest / Management arising from 12 month excavation period</b>	<b>£500,000</b>	
	<b>TOTAL ADDITIONAL COST DUE TO ARCHAEOLOGICAL ISSUES</b>	<b>£3,750,000</b>	<b>£2,000,000</b>
	<b>1-5 COLLEGE STREET (cost of making wind &amp; watertight)</b>	<b>£500,000</b>	
	<b>LAND CONTAMINATION</b>	<b>£100,000</b>	
	<b>SUSTAINABLE URBAN DRAINAGE</b>	<b>£500,000</b>	
	<b>AIR QUALITY</b>	<b>£500,000</b>	
	<b>DESIGN</b>	<b>Increase cost of constructing facades by 20%</b>	
<p><b>*Abnormal – costs over, and above, cost of developing ‘average’, brownfield, urban site.</b></p> <p>The Company also considers that there needs to be explicit reference to any future development of the site having to incorporate an element of car parking, for both the residential units to be accommodated thereon and for the further residential units to be developed on Sites IP206 and IP211.</p> <p>Development needs to incorporate some parking for the new residential units (at an indicative ratio of 2:1), together with parking (at a similar ratio) for those parts of Sites IP206 and IP211, which have not yet been built out.</p> <p>Sites IP206 and IP211 fell into the hands of the Receiver, before they were completed, due to the recession of 2008/2009. Unfortunately, and in order to generate some income/funds, the Receiver has sold off all the available parking, on both sites, with those parts of the development which have been completed. As such, there is no existing parking, and no</p>			

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<p>opportunity to provide further parking, for those parts of these developments that have not yet been completed. If the remaining parts of these developments are to be brought forward, in accordance with Policy SP3, some parking has to be provided on an adjacent, accessible, site.</p> <p>This is particularly important with respect to Site IP206. The Borough Council will be familiar with the issues that have beset the 20-storey tower block building which, despite being completed to 'shell' for nearly a decade, has never been occupied. Before that development can be completed, all of the cladding needs to be removed and replaced, and structural issues need to be rectified, at significant cost. Site IP206 also includes the Victorian Albion Wharf building, which the Company is committed to rebuilding, whilst retaining the important dock facing elevation (again at significant cost). Both investments can only be justified if there is some parking provision made for the new residents.</p> <p><b>Summary:</b> Support the identification of Site IP035, but object to the indicative capacity and lack of express reference to the need to provide parking for both the development itself and adjacent sites (IP206 and IP211). Without these changes, the Final Draft is unsound.</p>
<b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 4: Policy SP3.</b>	<p><b>Land with Planning Permission or Awaiting a Section 106.</b></p> <p>The Company supports the intentions underlying Policy SP3 and, in particular, the identification of Sites IP206 and IP211. The Company still considers, however, that the capacity figures are on the conservative side (and should be increased by up to 50%), with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035).</p> <p><b>Summary:</b> Object for the reasons set out above.</p>
<b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 5: Paras 5.1 to 5.8.</b>	<p><b>IP-One Area</b></p> <p>The Company supports the general vision for the IP-One area (see also representations made with respect to Core Strategy Chapter 6: Vision and Objectives and Spatial Strategy).</p> <p><b>Summary:</b> General support</p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
<b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 5: Policy SP11 and paras 5.17 to 5.23.</b>	<p><b>The Waterfront</b></p> <p>The Company fully supports this Policy.</p> <p><b>Summary: Support</b></p>
<b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 5: Policy SP15 and paras 5.32 and 5.38</b>	<p><b>Improving Pedestrian and Cycle Routes</b></p> <p>The Company supports the general thrust of the Policy, including the proposals to improve pedestrian links between the Central Shopping Area and Waterfront. However, there are still serious concerns about how these proposals impact upon the development of Site IP035.</p> <p><b>Summary: Qualified Support</b></p>
<b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 6: Merchant Quarter</b>	<p><b>The Merchants Quarter</b></p> <p>The Company controls three of the most important sites (IP035, 1P206 and IP211) in the Merchants Quarter and it is concerned that the Development Options plan (page 82), together with the Development Principles (as expressed in the table on page 83 &amp; 84), are not sound in that they will render development unviable and frustrate proposals to bring the sites forward. Whilst the Company does not take issue with the objectives for the Merchants Quarter, it is of the view that:-</p> <ul style="list-style-type: none"> <li>• North-South Linkages through Site IP035 are in the wrong location.</li> <li>• Proposals for a new 'urban focal space' on Site IP035 are oversized and over-ambitious.</li> <li>• Site IP035 is capable of accommodating buildings of more than five storeys in height without having an adverse impact upon the setting of adjacent listed buildings or the historic environment.</li> </ul> <p>This representation should be read together with the comments made</p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<p>with respect to the Site Allocations and Policies Document Chapter 5: Policy SP2.</p> <p>Summary: Object</p>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

#### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

#### **PRIVACY NOTICE**

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As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan-making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

80

**Felicia Blake**

---

**From:** Philip Charles  
**Sent:** 29 February 2020 09:29  
**To:** PlanningPolicy  
**Subject:** British Telecom, Bibb Way/Handford Road

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi,

I am writing in response to the proposed changes to the former British Telecom building on Handford Road/Bibb Way. I am a resident of Alderman Road and a daily user of the Alderman Nature reserve and canal that runs alongside the BT building.

My question would be are there any plans for developing the area of the nature reserve and canal on Bibb Way that is in front of the BT building? As I am sure you are aware it is an area that is often frequented by drug users and has become rather neglected. That being said it is a haven for wildlife and in the past 12 months I have seen badger, otter and bats on that corner as well as the foxes every day who have a den there also. Whilst I do not oppose the conversion of the building into residency I am concerned for the potential impacts on the wildlife in that area. Are there any plans for development or alteration to the canal or tow path?

Thank you and I look forward to hearing from you.

Best, Philip.

---

Philip Charles

**Felicia Blake**

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**From:** J Churchyard1  
**Sent:** 04 February 2020 14:27  
**To:** Felicia Blake  
**Subject:** Boat yard development objection

To whom it may concern regarding the development of the old boatyard cullingham rd.  
I and everyone effected by this plan to put housing so close to river are shocked this would even be considered  
there are several reasons why

1 This according to ibc own maps show this to be a high risk area for flooding

2 The sewers which run this road struggles as it is. So adding more houses to an already strained system will lead to major problems.

We have had anglian water out three times in the last 10years to jet to overloaded system  
. At the moment it is a mostly grassed area which allows water to soak away the surface area of roofs driveways ect would cause more problems

3 I'm always finding goldcrest newts in my back garden so the whole bank and surrounding area is their habitat

4 parking down this road has always been a issue adding more houses is just going to make it worse so each house would require at least two spaces per house

5 The building which would be pulled down will be full of asbestos which if some fly by night demolition team took the job on would pose a significant health danger to us the residents

6 Who will be responsible for the damage to our property if any damage is caused by heavy machinery such as pile driving if has to be done.

7 We do not want our back gardens overlooked a sunlight blocked just so someone can make a quick buck

So please reconsider this because this will not make a improvement to the St. It will damage our environment, risk our property to flooding. I will keep a copy of this email and if we suffer any flooding I will gladly show local papers

Yours sincerely Jamie churchyard

cc: -

.

Sent from my Sony Xperia™ smartphone

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	
<b>Please return this comments form to:</b>	<p><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</p> <p><b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b></p>
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	Mr	
<b>First name</b>	Charles	
<b>Last name</b>	Croydon	
<b>Job title (where relevant)</b>		
<b>Organisation (where relevant)</b>	Clean Air Ipswich	
<b>Address (Please include post code)</b>		
<b>E-mail</b>		
<b>Telephone No.</b>		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Charles Croydon (Clean Air Ipswich)
--	-------------------------------------

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p><b>Extensive modal shift is required in Ipswich to improve air quality and reduce carbon emissions but also to reduce the impacts of traffic from new developments.</b></p> <p><b>Suffolk County Council modelling indicates just over 15% modal shift is required in Ipswich by 2026 (as well as junction improvements etc to the existing network) yet sustainable travel options in Ipswich are poor and need considerable investment. There is insufficient evidence that the required funding to deliver the required improvements is available.</b></p>
	<p><b>The Local Plan is unsound because there are insufficient actions and investment proposed to improve air quality and to deliver the required levels of modal shift.</b></p>
	<p><b>Given the high levels of modal shift required but the cycling network is so poor people will not want to cycle and there is lack of cycle training to help people feel confident and safe.</b></p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**      Yes

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**      yes

**Adoption of the Ipswich Local Plan Review.**      Yes

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Planning & Development Department  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE



Tuesday 11<sup>th</sup> February 2020

Dear Sirs,

**King George V Field, Old Norwich Road, IP032 (UC033)**

I refer to the recent proposed local plan site allocation and would wish to comment on behalf of the Trustees of the King George V Field.

The use of this field for housing purposes has been under discussion with various developers and indeed your own council staff for probably as long as twenty years. The original developments envisaged housing to be over the entire site rather than partially over the site which the current plan seems to indicate. For the playing field to regenerate itself the intention was for the site to be sold for housing development and then a multi-sports field produced in the general area of Whitton but on a separate site.

Very clearly if this development goes ahead as it stands these plans would have to go out of the window as the Trust would not have sufficient funds to properly develop a multi-purpose site which is part of their original brief when set up.

You will equally understand that we cannot vacate the site and indeed it is in danger of "crumbling" around us because of indecision over the years.

The latest council officer involved has been a Helen Pluck but various officers have had contact with us over the years.

You will understand that it is not the principle that the Trustees would be concerned about but the partial use of the site and indeed it cannot be vacated until alternative arrangements have been made.

I would also comment that the Trust did not have any notification directed to it other than it being picked up by chance.

Please confirm that this letter is registered as a comment / objection.

Yours faithfully

D.J.Coe  
Trustee

**Felicia Blake**

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**From:** Tom Cole  
**Sent:** 28 February 2020 16:19  
**To:** PlanningPolicy  
**Cc:** Paul Burley  
**Subject:** Ipswich Local Plan Review Final Draft Consultation - Constable Homes Ltd - Red House Farm  
**Attachments:** 280220 Red House Farm Reps FINAL.PDF

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir or Madam,

Please find enclosed representations made on behalf of our client, Constable Homes Ltd, relating to Red House Farm, Tuddenham Road.

The representations are made in response to the Ipswich Local Plan Review Final Draft Consultation.

I would be grateful if you could respond to confirm receipt of this email.

Regards,  
Tom

**THOMAS COLE**  
SENIOR PLANNER

Montagu Evans LLP, 5 Bolton Street, London, W1J 8BA

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London  
W1J 8BA

Planning Policy  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

28 February 2020

Sent by email to: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Dear Sir or Madam,

**IPSWICH BOROUGH COUNCIL LOCAL PLAN REVIEW FINAL DRAFT CONSULTATION  
RED HOUSE FARM, TUDDENHAM ROAD**

**Introduction**

We write on behalf of our client, Constable Homes Ltd, to make representations in respect of the Ipswich Local Plan Review Final Draft, consisting of:

- The Core Strategy and Policies Development Plan Document (DPD) Review Final Draft; and
- The Site Allocations and Policies (incorporating IP-One Area action Plan) DPD Review Final Draft.

The final draft Local Plan sets out the Council's policies for growth in the Borough up to 2036.

These representations relate to the promotion of Red House Farm for residential development. Our client has engaged with previous plan-making stages in responding to the Call for Sites and Regulation 18 consultation exercises, and has entered into pre-application discussions with the Council and Highways Authority.

By way of background to these representations, Constable Homes Ltd has an interest in the land referred to as Red House Farm. Constable Homes is an operating subsidiary of the Anderson Group, which is a private development and construction business with an exceptional track-record of delivery across the south-east.<sup>1</sup> As a case in point, Anderson Group is currently nearing completion of 93 new homes off Europa Way in Ipswich Borough ('Jasmine Park'), and this has delivered around 50 completions per annum.<sup>2</sup>

The extent of our client's ownership is defined by the red line shown on Figure 1 below. The site is located to the north of Ipswich and comprises several fields and a 19th Century former farmhouse and outbuildings. The woodland and mature trees on-site are subject of a Tree Preservation Order ('Land between Tuddenham Road and Westerfield Road, No 7 2001'). The parcel of land is currently accessed by vehicles from Tuddenham Road and extends to circa 6.5 hectares in area. It is adjacent to residential dwellings to the south and is bound by agricultural land to the east, west and north.

Westerfield National Rail station is located approximately 500 metres to the north of the site and is served by a regular trains service between Felixstowe and Ipswich.

<sup>1</sup> <https://www.andersongroup.co.uk/>

<sup>2</sup> <https://www.andersongroup.co.uk/project/europa-way/>

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**Figure 1: Red House Farm**



Source – Google Maps

The site is identified as part of a Strategic Housing Site in the adopted Local Plan (2017) which is referred to as the Ipswich Garden Suburb.

Under draft Policy CS10 of the emerging Local Plan, the Ipswich Garden Suburb is expected to deliver 3,500 homes across three neighbourhoods referred to as Henley Gate (east of Henley Road and north of the railway line), Fonnereau (west of Westerfield Road and south of the railway line) and Red House (east of Westerfield Road). Red House Farm is located in the Red House neighbourhood.

#### **Response to the Draft Plan**

The representations are set out against the draft policies in the Core Strategy and Policies Development Plan Document Review Final Draft dated January 2020. As the site is allocated as a strategic site in the Core Strategy, the draft Site Allocations Document has no policies of relevance and so is not discussed further in these representations.

#### **Policy CS7: The Amount of Housing Required**

Draft Policy CS7 sets out the Council's proposed strategic housing policy. It establishes that the Council's minimum housing requirement is at least 8,010 dwellings for the period of 2018 to 2036, which equates to an annual average of 445 dwellings. The housing land supply would comprise a combination of site allocations with a windfall allowance of 50 units per annum between 2022 and 2036, which results in a total of 7,214 units. This is inconsistent with the minimum housing requirement of 8,010 units. We presume that this shortfall of 796

units is as a result of the housing supply period being reduced by a year from the base date of the Plan to 2019-2036 as per Table 4 of the Plan. This should be clarified by the Council.

The Government published the Housing Delivery Test 2019 measurement on 13 February 2020. Ipswich only delivered 611 homes across the previous three years against a target of 1,319 homes across the period. This equates to 46% of the minimum target which means that the Council is a "buffer authority". We note that the 2019 calculation uses 445 homes per annum and so reflects that of draft Policy CS7. In the previous year, the measurement for Ipswich Borough Council was 66%. This indicates that the Council's housing delivery has worsened and that measures need to be taken to recover the position. It is also very close to the 45% threshold in 2019 NPPF paragraph 215b. That threshold will increase to 75% next year which only serves to reinforce the urgency of addressing the significant shortfall in housing delivery. The Council should be proactively identifying opportunities to accelerate delivery to overcome this.

Paragraph 73 of the NPPF is therefore relevant, which states that strategic policies in respect of housing land supply should include a buffer of 20% to the five year housing land supply, where "*there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply*".

This adds to significant challenge of meeting 75% of need by November 2020 as set out in Paragraph 215c of the NPPF. It is assumed that this date is February 2021. No buffer has been applied to Policy CS7. In order for the Plan to be effective, a buffer equivalent to one year's supply (445 dwellings) units should be added to the five year housing land supply.

The NPPF is clear that, as a minimum, plans must seek to meet the area's objectively assessed needs in order to be found sound and so this should be set out within the Plan. The Council is in a critical position of acute under supply and failing to quantify the true need increases the likelihood that the unmet need will not be addressed. It is evident that an immediate review of the Plan will be necessary if the Council is only targeting a capped need figure.

#### Policy CS8: Housing Type and Tenure

Draft Policy CS8 explains the Council's policy approach to housing type and tenure is to plan for a mix of dwelling types to be provided to achieve strong, vibrant and healthy communities. In order to expedite the early delivery of residential development at Red House Farm, our client had considered the suitability of pursuing a scheme with an element of care accommodation as an alternative to a conventional residential scheme of around 100 C3 Class dwellings. In the Council's pre-application advice to our client, it has been suggested by Officers that there is no need for elderly accommodation in the Borough.

This is despite the Ipswich Housing Market Area Strategic Housing Market Assessment (SHMA) Part 2 Partial Update (January 2019) explaining that housing need projections indicate that the population aged 65 or over is set to "*Increase dramatically in the HMA over the plan period; from 104,985 to 153,578 in 2036, a rise of 46.3%*" (our emphasis). Despite this, the Council has taken the position that the SHMA identified no further need for specialist housing for the elderly and that a retirement living proposal at Red House Farm would not be supported by the Council.

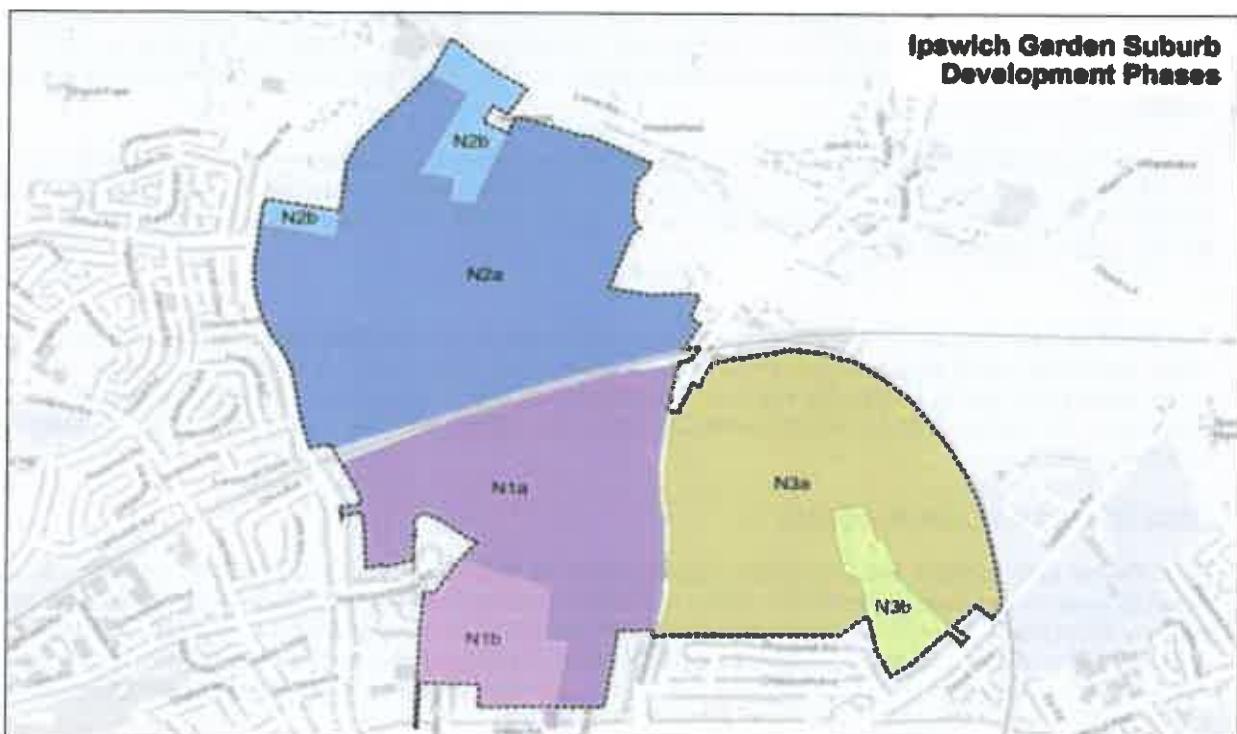
In response, we remind the Council that draft Policy CS8 does not separate elderly provision from other forms of housing and so it would effectively contribute to the Council's five year housing land supply. It is therefore somewhat surprising that the Council is not actively encouraging this form of development in the context of pressing overall needs. It is also relevant to note that a retirement village scheme is plainly a different form of housing provision to sheltered housing and so identifying a surplus of sheltered housing in the SHMA does not mean that there is no need for development to cater for the elderly. As such, the Council's position on this matter is not supported. Policy CS8 should be expanded to acknowledge that retirement living proposals are supported in order for the Plan to be effective. We also note the additional trickle-down benefits that would be achieved through down-sizing which will release family housing in established areas, which some buyers may prefer to new-build development and this would contribute to the diversity of housing supply. Our client will

continue to engage proactively with the council to agree an appropriate form and type of residential scheme on this discrete area of the Garden Suburb.

**Policy CS10: Ipswich Garden Suburb**

Draft Policy CS10 outlines that the spatial strategy regarding the scale and location of housing growth is to deliver 3,500 homes within the Garden Suburb. This is consistent with the adopted policy position. Our client's land is identified as part of the Garden Suburb allocation (area N3(b)) (Figure 2 below). This has been carried through from the Regulation 18 consultation and is supported by our client, reflecting that the site is inherently sustainable, suitable and available for residential-related development.

**Figure 2: Ipswich Garden Suburb Development Phases Plan**



Source – Ipswich Borough Council

We welcome that the Council is considering how the wider site might come forward for development, however we reiterate our concerns made at Regulation 18 stage that the Council continues to number the phases in a way that implies they should be delivered in numerical order; the phases are labelled N1(a), N1(b), N2(a), N2(b), N3(a) and N3(b). As explained above, Red House Farm incorporates a former farmhouse and outbuildings, and there are mature trees that line the boundaries of the plot. We note that the indicative masterplan shown by the Ipswich Garden Suburb SPD (2017) prioritises these features being retained and therefore, provided that the ability to connect other parcels is not prejudiced, development of this site can come forward in a self-contained manner.

As explained to the Council during pre-application discussions, our client has devised a way for Red House Farm to come forward for development at the earliest opportunity, in a manner that is independent of the wider masterplan but that does not conflict with the SPD. Development could be achieved by retaining existing buildings on site and existing trees around its periphery that would robustly screen a future proposal.

Our client's highways advisor, Caneparo Associates, has designed an effective and safe access arrangement in which the existing access from Tuddenham Road can be utilised to serve the development without severe



Impacts as per Paragraph 109 of the NPPF. This can be achieved by restricting access to residents only at this time, and then for general use, public transport and cycles in the future once the remaining road infrastructure is in place within the Red House Neighbourhood as per the Garden Suburb SPD (2017) requirements.

To that end, we are surprised that when the Council interprets its own policy that this development would be precluded rather than positively facilitated. It cannot be the intention of the planning system to delay much-needed development, particularly when the Government is clear that LPAs should act positively to enable development to be brought forward. The Council clarify its approach in order that the Plan is not ambiguous and therefore effective. As advocated by the NPPF, planning policies should be sufficiently flexible to ensure that they do not act as a burden to the delivery of development. This identifies a fundamental issue with the policy and the Council must reconsider how it proposes to operate the draft allocation in light of this.

We therefore suggest that the policy wording be amended to outline how each parcel could come forward individually, whilst still being in general accordance with the Council's growth strategy and the requirement for balanced growth across the strategic allocation. This could facilitate the timely delivery of residential accommodation, as recognised at paragraph 68(d) of the NPPF, especially in the context of the Council's housing supply position which is fast deteriorating.

#### Concluding Remarks

Our client welcomes and supports that the draft Plan to identify the site for development through its continued allocation within the Ipswich Garden Suburb. This reflects that the site represents a suitable, available and deliverable site, and offers a realistic prospect for the delivery of a significant quantum of C-class housing development within the emerging Plan period. This must be realised in a fashion that looks to facilitate the timely development of the site and not act as an impediment to this and we request that the Council reconsiders its current approach to ensure that its Local Plan will be effective.

Constable Homes Ltd is eager to continue to positively engage with the Council through Plan-making and will continue its pre-application discussion with the authority to refine the proposals at Red House Farm. We request that we are kept informed of any policy updates going forward. We would like to have the right to participate at any oral examination if necessary.

If you have any queries regarding this submission, or would like to discuss the proposals further, please do contact Paul Burley or Tom Cole at this office.

Yours sincerely,

*Montagu Evans*

Montagu Evans LLP

**From:** \_\_\_\_\_  
**Sent:** 15 January 2020 12:54  
**To:** PlanningPolicy  
**Subject:** Fwd: site ref IP307-Prince of Wales Drive

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

>>> To whom it may concern

>>> Firstly, I am surprised and saddened to think what was a piece of land sustained as a possible siting for twelve dwellings, Boyer are now intending to increase that number to eighteen. (Boyer leaflet distributed to some residents) I think the current proposal is too dense and totally out of character with the openness of the surrounding area. The plans would make it claustrophobic and cause a lot of distress, I fail to see any enhancement or asset to the area.

>>> Having lived here for over fifty years there have been many changes, mostly in highway traffic. Prince of Wales Drive is a nightmare with parking and the volume of traffic throughout the day and into the evening. Halifax School is the 'bottle neck' so to speak. As residents we have ongoing confrontations with unthinking parents whose children attend Halifax School, they tend to think it a given right to park wherever they like. This happens on a daily basis concerning parking across and turning in driveways with no thought or consideration to residents who may have to attend hospital appointments and the like. Currently the School is advising there is 'designated parking' within the parking area which is currently being used by AGE UK. You can count anything from 20/25 cars daily, mainly staff members, yet dinner ladies for some reason are not allowed to park over there, hence they and other part time members will park on the road or use the lay-by. What and where will these cars park if the plans go ahead?

>>> With proposed plans for houses to be built so close to the edge of the road, what are the chances of car owners just parking on the pavement? You only have to look on Streetview at no 27 to see what I mean. Two of the houses have no parking so they either park on the pavement or use the current car park. Residents in Aberdare Close suffer verbal abuse as do many of us regarding parking facilities. I have recently noticed the School leaves their traffic cones out on the road all day, due to the fact that coaches plus delivery lorries cannot draw up outside the school to unload.

>>> We have outstanding views of the River Orwell which give us immense pleasure, but if these plans go ahead these will be lost and replaced with houses which means we will be overlooked and suffer a loss of privacy, not to mention the added noise nuisance. Is it not within our Human Rights to be able to enjoy the peace and quiet of our own dwellings?

>>> Would bungalows be another option? They would certainly fit in much better and provide people with homes (maybe even disabled people) but definitely not two storey houses or three storey flats which would be totally out of character to the surrounding area.

>>> With the School, Dentist and Doctor's being over subscribed what would be the next option? What recreational space would be provided considering there is nothing shown on the plans? It would be a shame to see the garden at the front of the shops dug up because a lot of wildlife including foxes frequent this area.

>>> I would like to ask if Halifax School has been approached in favour of building an extension (Nursery) on the land? This would have a two fold solution, more much needed places for children within the area plus it would alleviate the continuing parking problems. It would also mean the local residents would get some respite, something nobody seems to consider.

>>> I understand the AGE shop takes £100,000 per year, it has been a very valuable asset to our community and in hindsight it is a great pity the Co-op never opened a smaller shop which would enable people to buy their daily necessities. They do advertise that they care for the local community! Apart from local residents you have parent's at the School plus next door to them there is the Prince of Wales Drive Nursing Home. People with money to spend and what choice do they have? With so much being placed on people's mental health nowadays, we need somewhere like a shop and a community place to bring people together. We are an ageing population in this area

and many do not have the capabilities to either walk down to Maldenham let alone up to Asda in the opposite direction for shopping. We are on the brow of a hill which makes it very difficult.

>>> Thank you for reading my comments, I only hope this makes someone rethink the proposed plans.

>>> Kind regards

>>> RoseMarie Cornish (Mrs)

>>> Sent from my iPad

## **Felicia Blake**

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**From:** RoseMarie Cornish <.....  
**Sent:** 23 February 2020 16:02  
**To:** Felicia Blake  
**Subject:** IP307 Planning Proposal

Dear Felicia

I hope this finds you well.

Please find my changed objection letter as promised. I will send photo's separately.

Kind regards

RoseMarie

~~~~~

Dear Sirs / Madam

It saddens me to think the Co-op have decided there is no need for a shop on this land but I beg to differ and think they have just set their sights on building houses.

The former Co-op was doing very nicely (Takings of £4000 on a Sunday) but it threw in the towel once Asda opened its doors on Stoke Park Drive. Next door to the Co-op was a very successful hairdressers alongside a Kitchen Design store but these were given notice and our community fell apart. If you look at the Chantry / Pinewood area they have three Co-op stores in very close proximity to the new Aldi, then just up the road there is the huge Tesco Store plus B&M and coming this way there is Asda. Sometimes the traffic flow is so bad at the latter that vehicles are queuing out on the road to get in. It kind of defeats what the Co-op are saying about their store not being viable.

We are on the brow of a hill with an ageing population and some of us and not very mobile making it near impossible to travel down and up to Asda. Come to that, younger families without transport have an awful long way to walk from Maidenhead to Asda.

The Co-op, (slogan, local caring shop) was the hub of the community, once they decided to close that and the adjoining stores, the community spirit fell away. People have become very isolated and with this comes depression. Mental health is a big issue nowadays and I hope this is taken into account when considering the proposals.

AGE UK ran a very successful shop within the former Co-op, (taking £100,000 per year) they had so many plans to set up a little cafe and a community centre within the store. These are things we desperately need in this area as we have nothing to bring the community together. I contacted AGE UK and they replied saying it wasn't their choice to close and given the chance they would carry on.

We bought our property over 50 years ago and have seen a great many changes. The main reason in buying was the stunning and iconic view up the River Orwell, no bridge back in 1969. This is something which can be enjoyed by many people in this part of town and it would be criminal and heartbreaking if we were to lose that wondrous view. Lord Belstead was insistent that the land in this area was as open as possible giving people the feeling of fresh air and well being. To think of blocking this with two storey houses plus a three storey block of flats would be heartbreaking.

I notice on the planning proposal that the current green spaces would be removed.

Again I wish to object to this because these are very important habitats, the piece of land in front of the main store attracts a lot of wildlife, goldfinch, blue and great tits; plus foxes. The great stag beetle (an endangered species) returns year after year and I for one have registered sightings of it. On the proposal plans I can see no green areas, no community areas, no bin or bike storage, surely that is wrong?

On the subject of Highway, the proposed area is a pressure point for traffic with it being directly opposite Halifax

School. When there are delays on Wherstead Road, Belstead Road or Heaven forbid the Orwell Bridge is closed, Prince of Wales Drive then becomes a 'rat run' with vehicles, including HGV's trying to find a way through. The school itself generates so much traffic from staff, and neighbour's have ongoing confrontations with blocking driveways and inconsiderate and abusive parent's every day. The school were given permission, and are still using the former Co-op car park as an overspill for their staff and visitors. It removes some of the vehicles from Prince of Wales Drive yet there is still a problem. Bus drivers have been known to call the Police due to cars blocking either side of the road making it impassable. Only last week we had cars parked all along the side of the bungalows, a bus was trying to manoeuvre up the road when a very irate woman tried to overtake the stationary cars coming face to face with the bus driver. Obviously the poor bus driver had right of way, yet the car driver got out of her car and was very abusive to him. In the end she had to reverse back up the road but these are ongoing situations. Traffic collisions are not uncommon but thankfully up to now, nothing too serious.

Red cones are left on the road outside the school all day to stop cars parking across the entrance but fail to do much good even with the caretaker in attendance. School buses ferrying children about plus delivery lorries have to unload on the actual road because they can't access the school. The lay-by outside the school is forever blocked with staff cars. I will attach photo's giving you an idea of the problems.

Thank you for reading my comments, please feel free to contact me should you wish to discuss any of the points which I have raised.

Yours sincerely  
RoseMarie Cornish (Mrs)

Sent from my iPad

**Felicia Blake**

---

**From:** RoseMarie Cornish --  
**Sent:** 23 February 2020 16:07  
**To:** Felicia Blake  
**Subject:** Fwd: IP 307 Photo's attached

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Felicia

These are the photo's which relate to my previous email. I hope they make sense.

The first one is of the green space outside the old Co-op

Photo 2 & 3 show a school bus which collects or drops the children off on the road, the red cones are on the road all day.

Photo 4 & 5 show how staff/visitors leave their cars on Prince of Wales Drive.

Kind regards

RoseMarie

Sent from my iPad

**Begin forwarded message:**

**Subject:** IP 307





## **Felicia Blake**

---

**From:** Cycle Ipswich  
**Sent:** 02 March 2020 21:54  
**To:** PlanningPolicy  
**Cc:** Felicia Blake; info@cycleipswich.org.uk  
**Subject:** Re: EXTENSION OF TIME: Notice of Public Consultation Ipswich Local Plan Review Final Draft

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello,

It's all very well having local plans, however relying on developer funding to make them actually happen is going to mean very little progress. Politicians need to properly fund the changes required as a political choice. Similarly, there's no point voting for a climate emergency when there's no serious funding to support it.

There needs to be a radical step change in the quality of and funding of walking, cycling, and public transport infrastructure. This focal plan is not radical enough.

To solve the air quality, obesity, health issues due to physical inactivity, traffic congestion, etc, there needs to be a step change in the modal shift and improved walking and cycling infrastructure. Park and Ride facilities have a negative impact on rural bus services outside of Ipswich, thus rural bus services should be prioritised over park and rides.

There is nothing in POLICY CS20: Key Transport Proposals about reducing rat running on residential roads, increasing the use of 20mph speed limits (as has happened in parts of London and all of Edinburgh), nor implementing protected cycle tracks on main roads. All of which are key to getting the modal shift required to reduce congestion and air pollution.

With the proposals in the local plan, there's likely to be very little change in the levels of walking and cycling in Ipswich. People currently only choose to walk or cycle in limited parts of Ipswich due to the very limited bits of infrastructure that exist, even then it's despite the conditions, not because it's a wonderful experience, or due to it being faster and more convenient than driving for short journeys.

Kind regards,

Shaun McDonald  
On behalf of Cycle Ipswich

On 24 Jan 2020, at 09:01, Felicia Blake <[Felicia.Blake@ipswich.gov.uk](mailto:Felicia.Blake@ipswich.gov.uk)> wrote:

Dear Sir/Madam,

Please see attached.

Kind regards,

If you wish to be taken off our email list please reply to me or email [PlanningPolicy@ipswich.gov.uk](mailto:PlanningPolicy@ipswich.gov.uk)

Felicia Blake

Business Support Officer

Planning and Development

Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1 2DE

Tel: 01473 43 2019

Email: [felicia.blake@ipswich.gov.uk](mailto:felicia.blake@ipswich.gov.uk)

Web: [www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Facebook: <https://www.facebook.com/IpswichGov>

Twitter: [twitter.com/IpswichGov](https://twitter.com/IpswichGov)

Achieve your fitness goals with an iCard Active [www.ipswichfit.co.uk](http://www.ipswichfit.co.uk)

Useful Links:

**Current Consultations**

<https://www.ipswich.gov.uk/currentconsultations>

**Closed Consultations**

Draft Suffolk Coast European Sites Recreational Disturbance Avoidance and Mitigation Strategy

Supplementary Planning Document (SPD) <https://www.ipswich.gov.uk/suffolk-coast-rams-spd>

Ipswich Local Plan Review Preferred Options <https://www.ipswich.gov.uk/ipswichfuture>

Conservation Areas Designation <https://www.ipswich.gov.uk/content/about-our-conservation-areas>

**Forthcoming Decisions List**

<https://democracy.ipswich.gov.uk/mgListPlans.aspx?RPId=135&RD=0&bcr=1>

**Recently Adopted**

<https://www.ipswich.gov.uk/content/urban-character-supplementary-planning-document>

<https://www.ipswich.gov.uk/content/public-consultation-ipswich-town-centre-waterfront-public-realm-strategy-spd>

<https://www.ipswich.gov.uk/content/urban-character-supplementary-planning-document>

<https://www.ipswich.gov.uk/content/development-and-archaeology-supplementary-planning-document-spd>

**Adopted Ipswich Local Plan 2011-2031**

<https://www.ipswich.gov.uk/content/adopted-ipswich-local-plan-2011-2031>

**Additional Planning Policy Links:**

<https://www.ipswich.gov.uk/localplan>

<https://www.ipswich.gov.uk/content/local-development-scheme>

<https://www.ipswich.gov.uk/services/ipswich-garden-suburb-northern-fringe>

<https://www.ipswich.gov.uk/services/community-infrastructure-levy> - Update only

For information about how Ipswich Borough Council processes personal data please visit [www.ipswich.gov.uk/privacy](http://www.ipswich.gov.uk/privacy)

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<Public consultation letter Ipswich Local Plan Final Draft 24th January 2020.pdf>

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**D**





**Our Ref: DfE/Local Plan/Ipswich 2020**

**2<sup>nd</sup> March 2020**

Dear Sir/Madam,

**Re: Ipswich Local Plan Review: Core Strategy and Site Allocations DPDs**

**Consultation under Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012**

**Submission of the Department for Education**

1. The Department for Education (DfE) welcomes the opportunity to contribute to the development of planning policy at the local level.
2. A response was made to the Regulation 18 consultation in March 2019 and raised the following points:
  - Support for site allocations at Ipswich Garden Suburb (Policy CS10); Co-op Depot (Policy CP7/allocation IP010a) and Mint Quarter (allocation IP048a). This recommended ensuring that the Regulation 19 consultation included details of phasing, delivery and further site-specific requirements.
  - Proposed site allocation at the Former Co-op Department Store site on Carr Street for a 2FE Primary School to deliver the Central Ipswich Free School.
  - Suggestion of site allocation for D1 use at Woodbridge Road site (allocation IP129) to allow Suffolk County Council to open a SEND school at the site.
3. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient school places, including those at sixth form, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We have published guidance on education provision in garden communities and securing developer contributions for education, at <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>. You will also be aware of the corresponding additions to Planning Practice Guidance on planning obligations, viability and safe and healthy communities.

4. We would like to offer the following comments in response to the above consultation documents (hereafter referred to individually as the CSDPD and SADPP).

#### **Soundness**

5. As you will be aware, the primary focus at this stage of the Local Plan's preparation is on the soundness of the plan, with regard to it being positively prepared, justified, effective and consistent with national policy. The following detailed comments set out DfE's view of the plan's soundness in respect of education provision.
6. The CSDPD notes that 7% of the borough is employed in education, and that there is a need to reduce inequality and social exclusion, including children living in poverty. The provision of sufficient and quality education is critical to supporting this.
7. Paragraph 4.33 of the SADPD sets out the context of the increase in primary school aged children and the need to make sufficient provision for this rise over the Plan period. It should be noted that significant housing growth is expected in the town centre (as per CSDPD Policy CS2).
8. CSDPD Policy ISPA2 includes education provision as a strategic infrastructure priority. The Education Provision Policy approach at CSDPD Policy CS15 sets out that new primary school capacity provision will be needed, and that sites to meet this will be allocated.
9. DfE supports the Council's prioritisation of education infrastructure, and the allocation and safeguarding of land for schools as set out in the following policies (in both the CSDPD and SADPD):
  - Ipswich Garden Suburb (Policy CS10) – 1 secondary school and 3 primary schools;
  - Co-op Depot (Policy CP7/allocation IP010a) – school expansion;
  - Mint Quarter (allocation IP048a) – primary school; and
  - BT Depot Woodbridge Road (allocation IP129) – SEND School.
10. As IBC will be aware, DfE is progressing a centrally approved 2 FE Free School (Central Ipswich Free School) to assist in meeting this Primary School need within the Mint Quarter allocation IP048a. A specific site has been identified at Carr Street (former Co-op Department Store site) within this allocation to deliver this. Suffolk County Council ('SCC') as the authority with a statutory duty to provide sufficient school places, have a requirement for the Central Ipswich Free School based on the basic need from the town centre area. It is demonstrated that there is a shortfall of capacity across the two school planning areas (there are extremely limited places available at existing town centre schools), as well as need generated by new housing development in this area identified in the SADPD. Therefore, there is significant demand for this school. Currently, there are increasing pressures with town centre schools being oversubscribed, as well as bulge classes being required and primary school pupils having to travel out of their local area to go to school. The further housing growth identified through the DPDs will exacerbate existing issues and therefore it is critical that the school is able to be delivered.

11. The site is located so as to best meet the needs arising from its catchment – in accordance with Policy DM24 part d. SCC undertook a site search exercise and identified no other suitable, available sites to meet this local need for primary school places.
12. DfE met with IBC in early 2020 to engage in pre-application discussions, regarding more technical and design matters to progress the project. Further detailed work will be undertaken to respond to IBC's comments, and in due course further pre-application work will be undertaken in liaison with IBC in order to move towards submission of a planning application later this year. The school is required as soon as possible in order to meet existing need and to cope with the housing growth likely to be experienced in the town centre.
13. There are some generic requirements in the overall allocation policy IP048 which are considered to cause potential conflict with the delivery of a Primary School expeditiously at the site. The requirement to develop residential uses at upper floors would not be necessarily wholly deliverable with a Primary School and therefore we would propose that the supporting text to the allocation makes clear that residential accommodation should only be provided where feasible and appropriate. The 'Development Principles' for Mint Quarter in the SADPD sets out that development should '*respect and enhance setting of Listed and historic buildings*'. This is not considered to wholly comply with the NPPF, specifically paragraph 197 which requires an assessment of the asset's significance (with regard to non-designated assets), and a balanced judgement to be made thereafter. Furthermore, NPPF paragraph 184 dictates that assets '*should be conserved in a manner appropriate to their significance*', which does not necessarily equate to '*enhancement*' in every scenario. The terminology '*historic building*' is also not robust or consistent with the NPPF. Therefore, we propose that the wording be amended to reflect the requirements in the NPPF, and the distinction between designated and non-designated assets.
14. SADPD Policy SP2 sets out the requirements for site allocations. Allocation IP048a includes the Primary School. DfE has concerns that the allocation wording is too restrictive and could potentially frustrate and delay the delivery of the school, which would have significant consequences for the sufficiency of school places. The specification of the retention of the locally listed façade is too specific for a site allocation policy, as it is not clear on what evidence this is based (i.e. following a full assessment of the asset's significance and setting).
15. The requirement for a development brief for the proposed primary school site is also considered to be unnecessary, the need for which is not sufficiently evidenced, given that pre-application discussions are underway on the Primary School site. DfE is committed to bringing the site forward and there is an urgent need for the school places. The requirement for a development brief could seek to delay this and hinder the delivery.
16. Therefore, we propose that the school component of allocation IP048a be stripped out from the policy and included as a separate allocation within this wider area, for a Primary School only, noting that development management policies will guide the preparation of a planning application covering detailed matters. This will ensure that there is a positive planning policy framework for the planning application to come forward in the short term to ensure the much-needed school places are able to be delivered without delay. Any undue burdens to the delivery of the school would not represent a positively prepared policy approach and could therefore be considered unsound.

## **Forward Funding**

17. DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue. Please see the Developer Loans for Schools prospectus for more information.<sup>1</sup> Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.

## **Developer Contributions and Community Infrastructure Levy (CIL)**

18. One of the tests of soundness is that a Local Plan is 'effective', meaning the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments.
19. Local authorities have sometimes experienced challenges in funding schools via Section 106 planning obligations due to limitations on the pooling of developer contributions for the same item or type of infrastructure. However, the revised CIL Regulations remove this constraint, allowing unlimited pooling of developer contributions from planning obligations and the use of both Section 106 funding and CIL for the same item of infrastructure. The advantage of using Section 106 relative to CIL for funding schools is that it is clear and transparent to all stakeholders what value of contribution is being allocated by which development to which schools, thereby increasing certainty that developer contributions will be used to fund the new school places that are needed. DfE supports the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development, consistent with Regulation 122 of the CIL Regulations.
20. While DfE supports Policy CS17: Delivering Infrastructure, we request a minor amendment either to the policy or its supporting text, to clarify that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. An example of this would be the local authority's expansion of a secondary school to ensure that places are available in time to support development coming forward. This minor amendment would help to demonstrate that the plan is positively prepared and deliverable over its period.
21. DfE would be particularly interested in responding to any update to the Infrastructure Delivery Plan/Infrastructure Funding Statement, viability assessment or other evidence relevant to education which may be used to inform revisions to local planning policies or the CIL charging schedule. As such, please continue to engage with DfE and consult us on any relevant future consultations.

## **Conclusion**

22. Finally, I hope the above comments are helpful in finalising IBC's Local Plan, with specific regard to the provision of land and developer contributions for new schools.

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<sup>1</sup> Please see DLS prospectus here: <https://www.gov.uk/government/publications/developer-loans-for-schools-apply-for-a-loan>

23. Please notify DfE when the Local Plan is submitted for examination, the Inspector's report is published and the Local Plan is adopted.
24. Please do not hesitate to contact me if you have any queries regarding this response. DfE looks forward to continuing to work with IBC to develop a sound Local Plan which will aid in the delivery of new schools.

Yours faithfully,

**Phoebe Juggins MRTPI**  
Forward Planning Manager – South East

Web: [www.gov.uk/dfe](http://www.gov.uk/dfe)

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                               |                                                                                                                                                                                                                                                         |
|---------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation document(s) to which this comments form relates: | <p><b>Core Strategy and Policies Development Plan Document (DPD) Review Final Draft;</b></p> <p><b>Site Allocations and Policies (incorporating IP-One Area action Plan) DPD Review Final Draft</b></p>                                                 |
| Please return this comments form to:                          | <p><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</p> <p><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b></p> |
| Return by:                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                         |
| This form has two parts:                                      | <p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>                                                                                                                                                                         |

| <b>PART A PERSONAL DETAILS</b>                 |                                                                 |                                    |
|------------------------------------------------|-----------------------------------------------------------------|------------------------------------|
|                                                | 1. Personal details                                             | 2. Agent's details (if applicable) |
| Title                                          | Miss                                                            |                                    |
| First name                                     | Phoebe                                                          |                                    |
| Last name                                      | Juggins                                                         |                                    |
| Job title ( <i>where relevant</i> )            | Forward Planning Manager                                        |                                    |
| Organisation ( <i>where relevant</i> )         | Department for Education                                        |                                    |
| Address<br>( <i>Please include post code</i> ) | Sanctuary Buildings<br>Great Smith Street<br>London<br>SW1P 3BT |                                    |
| E-mail                                         |                                                                 |                                    |
| Telephone No.                                  |                                                                 |                                    |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                          |
|----------------------------------------------------------------------|--------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Department for Education |
|----------------------------------------------------------------------|--------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.    | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Site Allocations DPD Policy IP048 | <p>1. As IBC will be aware, DfE is progressing a centrally approved 2 FE Free School (Central Ipswich Free School) to assist in meeting this Primary School need within the Mint Quarter allocation IP048a. A specific site has been identified at Carr Street (former Co-op Department Store site) within this allocation to deliver this. Suffolk County Council ('SCC') as the authority with a statutory duty to provide sufficient school places, have a requirement for the Central Ipswich Free School based on the basic need from the town centre area. It is demonstrated that there is a shortfall of capacity across the two school planning areas (there are extremely limited places available at existing town centre schools), as well as need generated by new housing development in this area identified in the SADPD. Therefore, there is significant demand for this school. Currently, there are increasing pressures with town centre schools being oversubscribed, as well as bulge classes being required and primary school pupils having to travel out of their local area to go to school. The further housing growth identified through the DPDs will exacerbate existing issues and therefore it is critical that the school is able to be delivered.</p> <p>2. The site is located so as to best meet the needs arising from its catchment – in accordance with Policy DM24 part d. SCC undertook a site search exercise and identified no other suitable, available sites to meet this local need for primary school places.</p> <p>3. DfE met with IBC in early 2020 to engage in pre-application discussions, regarding more technical and design matters to progress the project. Further detailed work will be undertaken to respond to IBC's comments, and in due course further pre-application work will be undertaken in liaison with IBC in order to move towards submission of a planning application later this year. The school is required as soon as possible in order to meet existing need and to cope with the housing growth likely to be experienced in the town centre.</p> <p>4. There are some generic requirements in the overall allocation policy IP048 which are considered to cause potential conflict with the delivery of a Primary School expediently at the site. The requirement to develop residential uses at upper floors would not be necessarily wholly deliverable with a Primary School and therefore we would propose that the supporting text to the allocation makes clear that residential accommodation should only be provided where feasible and appropriate. The 'Development Principles' for Mint Quarter in the SADPD sets out that development should 'respect and enhance'</p> |

| Document(s) and document part.                                   | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                  | <p><i>setting of Listed and historic buildings'. This is not considered to wholly comply with the NPPF, specifically paragraph 197 which requires an assessment of the asset's significance (with regard to non-designated assets), and a balanced judgement to be made thereafter. Furthermore, NPPF paragraph 184 dictates that assets '<i>should be conserved in a manner appropriate to their significance</i>', which does not necessarily equate to 'enhancement' in every scenario. The terminology 'historic building' is also not robust or consistent with the NPPF. Therefore, we propose that the wording be amended to reflect the requirements in the NPPF, and the distinction between designated and non-designated assets.</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p><b>Site Allocations DPD Policy SP2, allocation IP048a</b></p> | <p>5. SADPD Policy SP2 sets out the requirements for site allocations. Allocation IP048a includes the Primary School. DfE has concerns that the allocation wording is too restrictive and could potentially frustrate and delay the delivery of the school, which would have significant consequences for the sufficiency of school places. The specification of the retention of the locally listed façade is too specific for a site allocation policy, as it is not clear on what evidence this is based (i.e. following a full assessment of the asset's significance and setting).</p> <p>6. The requirement for a development brief for the proposed primary school site is also considered to be unnecessary, the need for which is not sufficiently evidenced, given that pre-application discussions are underway on the Primary School site. DfE is committed to bringing the site forward and there is an urgent need for the school places. The requirement for a development brief could seek to delay this and hinder the delivery.</p> <p>7. Therefore, we propose that the school component of allocation IP048a be stripped out from the policy and included as a separate allocation within this wider area, for a Primary School only, noting that development management policies will guide the preparation of a planning application covering detailed matters. This will ensure that there is a positive planning policy framework for the planning application to come forward in the short term to ensure the much-needed school places are able to be delivered without delay. Any undue burdens to the delivery of the school would not represent a positively prepared policy approach and could therefore be considered unsound.</p> |
| <p><b>Core Strategy DPD Policy CS17</b></p>                      | <p>8. While DfE supports Policy CS17: Delivering Infrastructure, we request a minor amendment either to the policy or its supporting text, to clarify that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. An example of this would be the local authority's expansion of a secondary school to ensure that places are available in time to support development coming forward. This minor amendment would help to demonstrate that the plan is positively prepared and deliverable over its period.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |
|--------------------------------|--------------------------------------------------------------------------------------------------------------|
|                                |                                                                                                              |
|                                |                                                                                                              |

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

|                                      |                                                                                                                     |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

**PRIVACY NOTICE**

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As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Felicia Blake**

---

**From:** Will Dowe  
**Sent:** 10 February 2020 21:00  
**To:** PlanningPolicy  
**Subject:** Alnesbourn Crescent Planning Proposal

Good afternoon

I am emailing to express my concern at the council's proposal to allow the grassland area adjacent to Alnesbourn to be used for housing.

This area of land borders an AONB which would be negatively affected by additional vehicular traffic in the area.

The existing access track to Bridge Wood/Orwell Meadows/Hallowtree Campsite is already in disrepair.

Additional traffic in the area would be at the detriment to the properties in the Alnesbourn Priory site.

It is a short-sighted effort by the council to boost housing in an area which is unequipped to handle the additional capacity.

No work should be allowed to take place. The land must be kept undisturbed which will allow the flora and fauna to develop. This will bring far more value to the people living and working in that area.

Yours sincerely,

Will Dowe  
Hallowtree Scout Activity Centre

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**E**



**Felicia Blake**

---

**From:** Michael Pingram  
**Sent:** 26 February 2020 14:12  
**To:** PlanningPolicy  
**Cc:** John Lawson  
**Subject:** Ipswich Borough Council 2019 Local Plan Final Draft Consultation - Representations submitted by LPP on behalf of ESNEFT - Ipswich Hospital Campus, Heath Road, Ipswich  
**Attachments:** ESNEFT Local Plan Final Draft Comments 26.02.20.pdf; LPP application form to LPA - 26-02-20.pdf

Dear Sirs,

Please find attached representations to the Ipswich Borough Council Local Plan Final Draft consultation, submitted by Lawson Planning Partnership Ltd, on behalf of our client East Suffolk and North Essex NHS Foundation Trust (ESNEFT).

A hard copy of this submission has been sent to the Council in today's post.

We trust that these representations will be taken into consideration in the preparation and drafting of the next stages of the Local Plan Review.

Should you have any queries, please do not hesitate to contact me on the details provided and I would be grateful if you could please confirm receipt of this email and attachments.

Kind regards,

Michael Pingram BA (Hons), MSc  
Planner  
Lawson Planning Partnership Ltd  
882 The Crescent  
Colchester Business Park  
Colchester  
CO4 9YQ

[www.lppartnership.co.uk](http://www.lppartnership.co.uk)



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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>Ipswich Borough Council Local Plan<br/>Core Strategy and Policies Development Plan Document Review – Final Draft</b>                                                                                                                                 |
| <b>Please return this comments form to:</b>                          | <u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or<br><br><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                         |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                                |

#### **PART A PERSONAL DETAILS**

|                                               | <b>1. Personal details</b> | <b>2. Agent's details (if applicable)</b>                                                 |
|-----------------------------------------------|----------------------------|-------------------------------------------------------------------------------------------|
| <b>Title</b>                                  | <b>See Agent's details</b> | <b>Mr</b>                                                                                 |
| <b>First name</b>                             |                            | <b>Michael</b>                                                                            |
| <b>Last name</b>                              |                            | <b>Pingram</b>                                                                            |
| <b>Job title (<i>where relevant</i>)</b>      |                            | <b>Planner</b>                                                                            |
| <b>Organisation (<i>where relevant</i>)</b>   |                            | <b>Lawson Planning Partnership Ltd</b>                                                    |
| <b>Address<br/>(Please include post code)</b> |                            | <b>882 The Crescent<br/>Colchester Business Park<br/>Colchester<br/>Essex<br/>CO4 9YQ</b> |
| <b>E-mail</b>                                 |                            |                                                                                           |
| <b>Telephone No.</b>                          |                            |                                                                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                                                                                                                |
|----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Agent - Lawson Planning Partnership Ltd<br>Client – East Suffolk and North Essex NHS Foundation Trust (ESNEFT) |
|----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.  | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |
|---------------------------------|--------------------------------------------------------------------------------------------------------------|
| Policy CS19                     | Please see enclosed LPP letter dated 25 <sup>th</sup> February 2020                                          |
| Paragraph 8.229                 | Please see enclosed LPP letter dated 25 <sup>th</sup> February 2020                                          |
| Paragraph 8.230                 | Please see enclosed LPP letter dated 25 <sup>th</sup> February 2020                                          |
| Policy CS17                     | Please see enclosed LPP letter dated 25 <sup>th</sup> February 2020                                          |
| Table 8B (Community Facilities) | Please see enclosed LPP letter dated 25 <sup>th</sup> February 2020                                          |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

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Planning Policy Manager  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

Tel 01206 835150

Co. Reg. No. 5677777

25<sup>th</sup> February 2020

Dear Sirs

**Ipswich Local Plan Final Draft (January 2020) – Representations on behalf of East Suffolk and North Essex NHS Foundation Trust (ESNEFT) concerning Ipswich Hospital Campus, Heath Road, Ipswich**

On behalf of our client East Suffolk and North Essex NHS Foundation Trust (ESNEFT), we write to provide our representations on the final draft Local Plan for your consideration. These representations build on our previous submissions dated 25<sup>th</sup> July 2017 and 13<sup>th</sup> March 2019 concerning the Local Plan, 'Call for Sites consultation (June – July 2017)' and the Local Plan Review Preferred Options consultation (November 2018), submitted on behalf of Ipswich Hospital NHS Trust, which in 2017/18 merged with Colchester Hospital University NHS Trust to form ESNEFT.

**Summary**

In summary, the representations are based on the NPPF's soundness tests and seek recognition that it is a statutory function of ESNEFT to provide acute health care services, which goes beyond the remit of the Council as Local Planning Authority. The representations also seek acknowledgement of ESNEFT's most up to date position concerning the related development strategy for the Heath Road Hospital campus and a small but important number of policy revisions to reflect this situation is also requested for consistency. Finally, it is also requested that acute Inpatient and outpatient facilities are added to the list and definition of community facilities, concerning potential recipients of developer infrastructure contributions.

**Background**

Following the merger of the two hospital trusts, ESNEFT is undergoing a Sustainability Transformation Plan (STP) to determine how acute hospital healthcare provision will be provided at each location. In addition, as part of a national initiative promoted by NHS England, acute hospital trusts are required to provide early delivery of additional inpatient bed spaces, which for Ipswich will support growth and resilience across the local health economy.

As part of these processes, significant investment in healthcare facilities and services is and will be taking place, to meet the requirements of the existing and future catchment population brought about in part by planned new housing growth included in the Local Plan. The provision of a new Emergency Department and Urgent Treatment Centre, which gained planning permission in 2019, is a key example of such investment and is due

Managing Director:  
John Lawson, BA(Hons) MPhil MRTP1

Director  
James Lawson, BA(Hons) MA MRTP1

Technical Director:  
Georgina Brotherton, BSc(Hons) MSc MRTP1

Associate Directors:  
Sharon Lawson, BA(Hons) DipTP MRTP1

882 The Crescent, Colchester Business Park,  
Colchester, Essex, CO4 9YQ  
[www.lppartnership.co.uk](http://www.lppartnership.co.uk)





to be implemented in 2020/21. To help deliver the STP and associated level of development linked with acute healthcare provision, a planning policy basis is required to provide for a suitable level of flexibility and certainty within which the Trust may bring forward its investment and development plans through planning applications.

### **Key Planning Policy Issues & Revisions Sought**

With the above background and NPPF soundness tests in mind, our representations focus on the wording of final draft policies CS19: Provision of Health Services and CS17: Delivering Infrastructure, and the related supporting text.

#### **CS19: Provision of Health Services**

This policy provides the basis for determining planning applications for development at the Ipswich Hospital Campus on Heath Road. At present, the policy seeks to 'safeguard' the hospital site for health and ancillary uses and refers to the provision of a site-wide masterplan to accompany related planning applications. Whilst there is no objection to a masterplan approach which reflects ESNEFT's Intentions, the inclusion of the word 'safeguards' is unnecessarily restrictive and inflexible.

As a statutory health authority and acute service provider, ESNEFT requires further flexibility in how it plans and develops the Hospital site, which in addition to the range of health care and ancillary uses listed below, may also include non-health care provision, should land become surplus to health care requirements over the 15 year plan period. Again, to allow for further flexibility, the inclusion of 'other ancillary uses' should be added to the policy as suggested.

Therefore, it is considered that the Policy as currently drafted would not; enable sufficient flexibility to enable ESNEFT to realise its development requirements, reflect related legal or procedural requirements, or reflect the most appropriate strategy for the site. Therefore, as currently drafted these parts of the plan are contrary to the tests set out in paragraph 35 of the NPPF.

However, it is acknowledged that development proposals for the hospital site should be considered in the context of a masterplan and suitable transport and parking strategy, which ESNEFT is currently preparing.

Consequently, small but important revisions to Policy CS19 have been suggested, which would provide further flexibility by removing the overly restrictive safeguarding requirement and allowing for a wide range of health care and ancillary uses across the site. The revised policy wording also allows for potential and appropriate non-health care uses to come forward providing they would be consistent with ESNEFT's health care strategy and masterplan for the site as a whole.

#### **Policy CS19: Provision of Health Services**

**The Council supports the development of healthcare related facilities at the Heath Road Hospital Campus as identified on the policies map. Related uses may include:**

- Further Inpatient and outpatient accommodation and facilities
- Staff accommodation;
- Residential care home;
- Intermediate facilities;
- Education and teaching centre;



- Therapies centre; and
- Other ancillary uses.

**Proposals for new and improved healthcare, ancillary facilities and other compatible development at Heath Road Hospital Campus will be supported providing they form part of the Hospital Trust's Estate Strategy for the provision of healthcare facilities, consistent with an overall site wide masterplan prepared by the Trust and associated Transport Strategy including suitable travel plan measures and parking provision.**

It is also requested that the last sentence of the supporting text within Paragraph 8.229 is deleted as it covers healthcare matters that go beyond the scope of the Local Planning Authority's remit. Additional sentences are requested to demonstrate examples of the other ancillary uses referred to above.

Requested revision to paragraph 8.229:

**The Heath Road Hospital is a strategic health facility serving Ipswich and the surrounding area. It is important that any rationalisation of uses there takes place in the context of a planned strategy for healthcare provision which itself takes account of the future growth of Ipswich and the Ipswich Strategic Planning Area. The policy allows for a range of healthcare and other compatible uses, including staff support services to assist with recruitment and retention. Additional ancillary uses may also include shared facilities to deliver a mutual benefit to other public sector organisations aligned with the one public estate agenda.**

The supporting text also needs to be amended to link any parking issues to those directly associated with proposed hospital activity related to specific developments, rather than any parking issues that may be occurring in the area generally.

Requested revision to paragraph 8.230:

**It is also essential that the travel implications of specific hospital related developments are fully considered and measures are put in place to encourage the use of sustainable modes where practicable by staff, outpatients, and visitors. In particular, measures should tackle parking issues in surrounding residential areas associated with proposed Hospital activity and the Hospital should put in place monitoring to ensure that any measures are proving to be effective.**

#### CS17: Delivering Infrastructure

This policy provides the basis for obtaining developer contributions towards essential infrastructure provision. It is noted that health and emergency services are again referred to, although there is no specific reference to acute hospital facilities. Therefore, for completeness, the following additions to the Policy and supporting text are requested.

Point 3 on page 98 – amend to read;

#### **3. health including acute care and emergency services.**

Bullet point 7 on page 98 – amend to read;

- community facilities including GP surgeries, health centres and key acute inpatient and outpatient facilities;



Page 203 – list of strategic infrastructure facilities. Under ‘Community facilities’ add the following to the description of facilities

**Improved acute and general healthcare provision at Heath Road Hospital**

We trust you will find our representations to be helpful as part of the local Plan review process and please contact us if you require further clarification.

Yours faithfully

-

**Lawson Planning Partnership Ltd**

**cc ESNEFT**



Mr Carlos Hone  
Operations Manager  
Planning and Development  
Ipswich Borough Council  
Planning Policy and Delivery Team  
Grafton House  
15-17 Russell Road  
Ipswich Suffolk  
IP1 2DE

Your ref:  
Our ref:  
Date: 2<sup>nd</sup> March 2020  
Please ask for: Andrea McMillan  
Customer Services: 03330 162 000  
Direct dial:  
Email:

Dear Mr Hone,

#### **Consultation on Ipswich Borough Local Plan Review Final Draft**

East Suffolk Council (The Council) would like to take the opportunity to express its support for the Ipswich Borough Council (IBC) Local Plan Review Final Draft, which comprises the Core Strategy and Policies Review Final Draft and the Site Allocations and Policies (incorporating IP-One Area Action Plan) Review Final Draft. The Council provided comments on the Ipswich Local Plan Review Preferred Options on the 12th March 2019.

The Ipswich Strategic Planning Area (ISPA) Board, of which the Council is a member, involves ongoing work between the member authorities of the ISPA Board in relation to addressing strategic cross boundary planning matters. The Council is committed to and supportive of this collaborative working, as demonstrated through the production of the Statement of Common Ground for the ISPA, which outlines the joint working undertaken and the outcomes in relation to planning for environmental, economic, housing and infrastructural matters. These matters have been taken forward through policies contained in the Suffolk Coastal Final Draft Local Plan, currently undergoing Examination, and policies ISPA1 – ISPA4 in the IBC Local Plan Review Final Draft are broadly similar. Policy SCLP2.1 Growth in the Ipswich Strategic Planning Area of the Suffolk Coastal Final Draft Local Plan (January 2019) seeks to support the continued role of Ipswich as the County Town.

As a reminder, it should be noted that from 1<sup>st</sup> April 2019 the new East Suffolk Council was created, and references to Suffolk Coastal District Council in the Ipswich Local Plan Final Draft should be updated accordingly.

The Council does not raise any issues in relation to the overall soundness of the Ipswich Local Plan, however, would wish to make comments in relation to parts of the Plan as set out below.

---

**LEGAL ADDRESS** East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT  
DX: 41400 Woodbridge

**POSTAL ADDRESS** Riverside, 4 Canning Road, Lowestoft NR33 0EQ  
DX: 41220 Lowestoft

### **Policy ISPA2: Strategic Infrastructure Priorities**

The Council would like to highlight that the equivalent policy in the Suffolk Coastal Final Draft Local Plan (Policy SCLP2.2) includes reference to police, community safety and cohesion provision and green infrastructure and suitable alternative natural greenspace. It is suggested that policy ISPA2 should also include reference to these strategic infrastructure priorities. This would align the policy with the Statement of Common Ground between the ISPA authorities which specifically references police, community safety and cohesion provision and green infrastructure and suitable alternative natural greenspace (SANG) as other strategic infrastructure priorities. Ipswich Borough Council will be aware that, following publication of the Ipswich Local Plan Review Final Draft, there have been recent announcements relating to the ceasing of the Ipswich Northern Routes project.

### **Policy ISPA3: Cross-boundary mitigation of effects on Protected Habitats and Species**

The Council is supportive of the commitment to address the issue of recreational impact avoidance and mitigation through continued joint working. This policy reflects the equivalent policy within the Suffolk Coastal Final Draft Local Plan (Policy SCLP2.3 'Cross-boundary mitigation of effects on Protected Habitats') and is considered by the Council to be sound. The Council does however set out further related comments below in relation to Policy DM8: Natural Environment.

### **Policy ISPA4: Cross Boundary Working to Deliver Sites and Policy CS2: The Location and Nature of Development**

The Council is supportive of the general principles of these policies regarding the development of land at the northern end of Humber Doucy Lane. This approach is complementary of the Suffolk Coastal Final Draft Local Plan policy for Land at Humber Doucy Lane (Policy SCLP12.24), and along with other policies and site allocations in the Ipswich Local Plan Final Draft contributes towards the outcome outlined within the Statement of Common Ground of each local planning authority meeting housing needs within their own area. In particular, the Council supports the 30% affordable housing requirement of Policy ISPA4 which appropriately complements the affordable housing policy (SCLP5.10 'Affordable Housing on Residential Developments') in the Suffolk Coastal Final Draft Plan.

It is suggested that policy for development at the northern end of Humber Doucy Lane references the maintenance of separation between Ipswich and the surrounding settlements, for consistency with Policy DM11 'Countryside'. It is noted that Policy ISPA4 infers that SANGs will be required on both sides of the Borough boundary for the Humber Doucy Lane site. For clarity and to enable the provision for any SANG to be considered through the project level Habitats Regulations Assessment, and to be reflective of the plan level Habitats Regulations Assessment, it is considered that the Policy could provide an appropriate level of flexibility by not specifying that SANG be located on both sides of the Borough boundary.

Also, as a general point, reference to SANGs as Suitable Accessible Natural Greenspaces should be changed to Suitable Alternative Natural Greenspaces to reflect the meaning of the term SANGs.

#### **Policy CS10: Ipswich Garden Suburb**

The Council welcomes the protection of the physical separation between Ipswich and Westerfield village. Such protection accords with Policy SCLP10.5 'Settlement Coalescence' of the Suffolk Coastal Final Draft Local Plan relating to settlement coalescence which aims to prevent the development of land between settlements that leads to urbanising effects between settlements. Policy CS10 also facilitates a country park towards the north of the Ipswich Garden Suburb and the Suffolk Coastal Final Draft Local Plan carries forward the allocation of land in the north of Ipswich Garden Suburb as part of the country park (Policy SCLP12.23 'Land off Lower Road and Westerfield Road (Ipswich Garden Suburb Country Park)'). This approach is considered by the Council to be sound.

#### **Policy CS11: Gypsy and Traveller Accommodation**

The Council is supportive of the Ipswich Local Plan in seeking to identify land within the Borough boundary for permanent Gypsy and Traveller pitches to meet its identified need, and would support the Borough Council in looking to identify sites in the Borough to meet the need. The ISPA Statement of Common Ground states that each local planning authority will plan to meet its own need for permanent pitches for Gypsies and Travellers and should have a policy settling out how this will be delivered in its own area. The Statement of Common Ground goes on to state that where the capacity to accommodate pitches cannot be met within the local authority's boundary a comprehensive re-assessment of deliverability will be undertaken and the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.

The Council notes that the Policy includes a reference to developing a short stay site between Ipswich and Felixstowe. Whilst this approach was identified in the adopted IBC Core Strategy and Policies DPD (2017), the authorities across Suffolk are working together to deliver sites to meet the needs identified in the Accommodation Needs Assessment (this identified a need for two to three sites in the study area which covers the ISPA authorities plus the former Waveney part of East Suffolk). The policy should appropriately apply some flexibility in meeting needs for short stay stopping sites in order to be effective and consistent with the approach outlined in the Statement of Common Ground.

#### **Policy CS16: Green Infrastructure, Sport and Recreation**

The Council supports and welcomes the approach of working with partners in respect of the Recreational Avoidance and Mitigation Strategy and a new country park within the Ipswich Garden Suburb. Both of the aforementioned aspects of this policy are reflective of the joint work being undertaken between the Council and IBC. The Council also supports joint working with IBC and other neighbouring authorities to deliver strategic green infrastructure. In particular, the establishment of a green trail around Ipswich is reflected in Policy SCLP12.24 'Land at Humber Doucy Lane' in the Suffolk Coastal Final Draft Local Plan.

### **Policy CS17: Delivering Infrastructure and Policy CS20: Key Transport Proposals**

The Council is supportive of IBC's positive commitment to the delivery and funding of mitigation through a transport mitigation strategy as part of collaborative working through the ISPA Board. This is consistent with the ISPA Statement of Common Ground which sets out a commitment to produce a mitigation and funding strategy to mitigate the highways impacts of growth across the ISPA authorities. The potential measures outlined in Policy CS20 are consistent with the potential measures outlined in Suffolk County Council's Transport Mitigation Strategy.

The Council notes that a number of policies in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft would support the delivery of transport mitigation in the ISPA. Particularly, the Council notes the potential provision for park and ride facilities under site allocation IP152 Airport Farm Kennels and under policy SP9 Safeguarding Land for Transport Infrastructure, improvements to cycling and walking provision under policy SP15 and limiting congestion (along with supporting the economy) under Policy SP17 Town Centre Car Parking.

The categories of infrastructure detailed in Policy CS17 are broadly in line with the infrastructure commitments in Policy SCLP2.2 'Strategic Infrastructure Priorities' of the Suffolk Coastal Final Draft Local Plan. Where infrastructure projects require cross-boundary cooperation, they have been identified in the Annex of the ISPA Statement of Common Ground. These projects are appropriately identified in both the Infrastructure Delivery Framework of the Suffolk Coastal Final Draft Local Plan and Table 8A of the IBC Final Draft Plan.

The Council notes that Policy CS17 refers to infrastructure to be secured from new developments including early years provision. This is consistent with the Annex of the ISPA Statement of Common Ground which identifies the provision of early years provision in north east Ipswich. However, it is not clear in Table 8A of the plan whether early years provision in north east Ipswich has been identified as an infrastructure priority, consistent with the ISPA Statement of Common Ground. The Council has included as a criterion within Policy SCLP12.24 'Land at Humber Doucy Lane' of its Final Draft Local Plan provision of an early years setting on site, if needed. To be effective it is recommended that this is replicated in Policy ISPA4 of the Ipswich Local Plan Review Final Draft.

### **Policy DM3: Air Quality**

The Council notes IBC's air quality screening study, as part of the new evidence base documents for the IBC Local Plan Review. The air quality screening has considered growth across the ISPA and the Council would note that there are potential linkages with mitigation outlined to deliver modal shift through an ISPA transport mitigation strategy as outlined above.

### **Policy DM8: The Natural Environment**

The Council is supportive of this policy and the approach it takes. However, the equivalent policy within the Suffolk Coastal Final Draft Local Plan (Policy SCLP10.1 'Biodiversity and Geodiversity') refers to the Recreational Avoidance and Mitigation Strategy (RAMS), and as such provides a development management policy approach to implementing the strategy which has been worked

**up on a cross-boundary basis. In this respect, to be effective Policy DM8 could be strengthened through reference to securing contributions to facilitate the implementation of the strategy.**

**The Council would wish to be notified of progress of the Ipswich Local Plan Review Including the submission, the publication of the Inspector's report and the adoption of the Plan. We trust our comments above are helpful but please do not hesitate to contact us should you require any clarification on the points raised.**

**Yours Sincerely,**

**Andrea McMillan | Principal Planner  
East Suffolk Council**

This submission is confirmed

[26275]

### Object Policy CS1 Sustainable Development

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

We are pleased that paragraph 8.41 refers to UKCP18.

Paragraph 8.44 refers to buildings at risk of flooding through tidal surges and heavy rain. However, this paragraph does not specifically refer to fluvial flood risk. We therefore would require this to be updated accordingly.

Paragraph 8.45 refers to the SFRA. The SFRA is a living document and should be updated when new modelling becomes available.

**Changes to plan:** We are pleased that paragraph 8.41 refers to UKCP18. Paragraph 8.44 refers to buildings at risk of flooding through tidal surges and heavy rain. However, this paragraph does not specifically refer to fluvial flood risk. We therefore would require this to be updated accordingly. Paragraph 8.45 refers to the SFRA. The SFRA is a living document and should be updated when new modelling becomes available. Our main comments that need to be actioned relating to the SFRA can be found within our response to policy DM4 - Flood Risk.

**Representation at examination:** Written Representation

This submission is confirmed

[26276]

Support Policy CS11 Gypsy and Traveller Accommodation

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

We are pleased to see that paragraph 8.148 refers to caravans, mobile homes and park homes intended for residential use being classified as 'highly vulnerable' and therefore not compatible with Flood Zone 3 and require the exception test in Flood Zone 2.

Representation at examination: Written Representation

This submission is confirmed

[26277]

Support Policy CS16 Green Infrastructure, Sport and Recreation

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

We are satisfied that this paragraphs incorporates our previous comments in relation to Natural Flood Management.

Representation at examination: Written Representation

This submission is confirmed

[26278]

## Object Plan 2 Flood Risk

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

This plan includes a statement which says "This plan of nationally designated flood zones relates to fluvial flooding. Further information on pluvial (surface water) flooding can be found in the Strategic Flood Risk Assessment (SFRA)." This statement is incorrect as the plan shows both fluvial and tidal flooding. This will also need to be updated when the new modelling which will be within the living SFRA when completed.

**Changes to plan:** This plan includes a statement which says "This plan of nationally designated flood zones relates to fluvial flooding. Further information on pluvial (surface water) flooding can be found in the Strategic Flood Risk Assessment (SFRA)." This statement is incorrect as the plan shows both fluvial and tidal flooding. This will also need to be updated when the new modelling which will be within the living SFRA when completed. Our full comments on the SFRA can be found in our response to policy DM4 - Development and Flood Risk.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** Please see our response to policy DM4 - Development and Flood Risk.

This submission is confirmed

[26279]

## Object Policy DM4 Development and Flood Risk

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

At present, we are raising an unsound representation on Flood Risk grounds. This is because the evidence base that informs the Local Plan is not yet finalised. Further information can be found below.

**Changes to plan:** At present, we are raising an unsound representation on Flood Risk grounds. This is because the evidence base that informs the Local Plan is not yet finalised. The Strategic Flood Risk Assessment (SFRA) has not yet been agreed as the River Gipping fluvial model is not yet verified and ready for use. This is because we are still awaiting the final outputs and deliverables for this model. Therefore, there is not currently a reliable evidence base to derive the SFRA and inform the Local Plan. We have and will continue to work in partnership with Ipswich Borough Council on the SFRA. As soon as the modelling is completed we will be able to engage further to ensure that the SFRA is finalised and the Local Plan appropriately reflects its findings. A statement of common ground will be prepared if required. In addition to the above, we have included our comments below on the rest of the Local Plan document. These have been provided in the same format as the Local Plan itself. In terms of the rest of the policy itself: Paragraph 9.4.10 needs to make reference to the fact that the SFRA is a living document and is awaiting modelling information to update it. We fully agree with paragraph 9.4.12 which states that more and less vulnerable development in Flood Zones 2 and 3a may be acceptable but will require Flood Risk Assessments (FRAs) to demonstrate that such developments will be safe.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** The evidence base needs updating as referenced in our representation. We are working with Ipswich Borough Council on this and will be able to update further when the model review is completed.

This submission is confirmed

[26284]

### Object Chapter 1 - Introduction

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

Comments above are mainly pulled from our response to policy DM4 of the local plan. These have been reiterated here in the Introduction section to the site allocation document because our comments cannot be site specific until the SFRA and Gipping model are complete.

**Changes to plan:** Our full comments and what needs to be changed can be found above.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** Without a complete SFRA as a result of potential changes being needed as a result of the Gipping model that is being updated, we are unable to fully review the site allocations. As soon as this is complete - we will have a better idea as to what is required, if anything.

This submission is confirmed

[26274]

### Object Chapter 6 - Vision and Objectives

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

Paragraph 6.16 states that the Strategic Flood Risk Assessment (SFRA) has been revised. However, this is currently being updated so this section should be amended. The Local Plan should also refer to the SFRA as being a living document.

**Changes to plan:** Paragraph 6.16 states that the Strategic Flood Risk Assessment (SFRA) has been revised. However, this is currently being updated so this section should be amended. The Local Plan should also refer to the SFRA as being a living document. Our full comments in relation to this can be found within our response to policy DM4 - Flood Risk. This is the main reason for our objection comment.

Document is not sound

Representation at examination: Written Representation

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**F**



26 February 2020

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

**Site Reference: iP307 Prince of Wales Drive**

Dear Sir/Madam,

We live next to the former Co-op site and wish to object to proposed redevelopment of land at Prince of Wales drive.

Whilst we agree the need for affordable housing, the proposed development will have an adverse effect on an area which is currently struggling to accommodate the number of vehicles parking in Chatsworth Crescent and Prince of Wales Drive.

This is compounded around school times when the roads are sometimes impassable.

Even though the former Co-op site with its 21 car park slots is currently used as an 'overflow' car park, not only for the local residents but also during the two periods of the 'school run', there is still not enough parking.

With the number of development properties suggested - 12 two storey houses and 6 flats in a three storey building and their allocated 22 car parking spaces, what effect will that have on the surrounding area?

Where are local residents, who currently use the former Co-op site, going to park ?

How bad will the congestion become during the 'school run' ?

Additionally, the inclusion of an apartment block 3 storeys high would be totally out of character with the surrounding structures and for those properties it backs on to would be a direct intrusion causing loss of privacy and overlooking.

Yours faithfully,

M.S. Forster

**Felicia Blake**

---

**From:** l  
**Sent:** 15 January 2020 10:16  
**To:** PlanningPolicy  
**Subject:** objection to plan ref IP307

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/Madam

I have received a flyer from the proposed developers of the old Co-op along Prince of Wales Drive and have just seen a Local plan site application notice on the 20MPH sign near my property.

I'm writing to you to let you know that if and when a planning application is submitted I am planning to object to the proposals.

Yours Sincerely

Terry Forster

**Felicia Blake**

---

**From:**   
**Sent:** 04 February 2020 00:34  
**To:** PlanningPolicy  
**Subject:** Objection letter ref IP307 Prince of Wales Drive  
**Attachments:** Council form IP307 dated 4.2.20.docx; Objection letter IP307 date 4.2.20.docx

Hi there

Please see attached my objection letter and form from Council website

Regards

Terry

|                                                                      |                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>IP307 Prince of Wales Drive</b>                                                                                                                                                                                                                  |
| <b>Please return this comments form to:</b>                          | <b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b><br><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>ipswich<br/>IP1 2DE</b> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                     |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                            |

#### PART A PERSONAL DETAILS

|                                               | <b>1. Personal details</b> | <b>2. Agent's details (if applicable)</b> |
|-----------------------------------------------|----------------------------|-------------------------------------------|
| <b>Title</b>                                  | Mr                         |                                           |
| <b>First name</b>                             | Terry                      |                                           |
| <b>Last name</b>                              | Forster                    |                                           |
| <b>Job title (where relevant)</b>             |                            |                                           |
| <b>Organisation (where relevant)</b>          |                            |                                           |
| <b>Address<br/>(Please include post code)</b> |                            |                                           |
| <b>E-mail</b>                                 | -----@-----.com            |                                           |
| <b>Telephone No.</b>                          |                            |                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                           |  |
|---------------------------------------------------------------------------|--|
| <b>Your name or organisation (<i>and client if you are an agent</i>):</b> |  |
|---------------------------------------------------------------------------|--|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| <b>Document(s) and document part.</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|                                       | <b>Please see attached word document/letter</b>                                                                     |
|                                       |                                                                                                                     |
|                                       |                                                                                                                     |
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**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| Document(s) and document part | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |
|-------------------------------|--------------------------------------------------------------------------------------------------------------|
|                               |                                                                                                              |
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Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**     

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**     

**Adoption of the Ipswich Local Plan Review.**

**3.2.2020**

**Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE**

**OBJECTION to IP307 Prince of Wales Drive**

**18 two story dwellings and block of flats**

**Dear Mr/Mrs Case Officer**

**We live adjacent to the proposed development site and we are writing to ask that Ipswich Borough Council refuse this planning application from (Boyer, 15 De Grey Square, De grey Road, Colchester, Essex CO4 5YQ)**

**Herein are our comments and objections relating to this planning application:**

**1. Loss of privacy and overlooking**

**District Wide Local Plan, Policy states that new developments will be expected to provide a high standard of layout and design that ensures adequate privacy for the occupants of the building and of adjacent residential properties.**

**The end terrace will directly overlook our property; this will lead to a loss of privacy and will certainly impact on the peaceful enjoyment of our home and garden.**

**The proposed site of development is at such an angle that the primary amenity area of our garden, would be severely overlooked from the top rooms of the new development, resulting in a serious invasion of our privacy.**

**We believe that the proposed development is a direct contravention of the District Wide Local Plan. The design of the proposed development does not afford adequate privacy for the occupants of the building or of adjacent residential properties, particularly with regard to their right to the quiet enjoyment of garden amenities. We would urge you to consider the responsibilities of the council under the Human Rights Act in particular Protocol 1, Article 1 which states that: a person has the right to peaceful enjoyment of all their**

possessions which includes the home and other land. We believe that the proposed development would have a dominating impact on us and our right to the quiet enjoyment of our property. Article 8 of the Human Rights Act states that: a person has the substantive right to respect for their private and family life.

The building will be visually overbearing, as all we will see is a two-story brick wall. It is an inappropriate design for this part of the road. Such a terrace building would be totally out of keeping with the neighbouring properties, which are mainly semi-detached houses and single storey bungalows.

## **2, Protection of valuable open space**

**District Wide Local Plan, It is important that development of vacant urban land should not involve the loss of valuable open space. Furthermore, sensitive planning control is necessary to ensure that the cumulative effects of redevelopment do not damage the character and amenity of established residential areas.**

This is clearly an unacceptably high density and over development of an open site, especially as it involves loss of garden land and the open aspect of the neighbourhood. Lord Belstead in the 1960's wanted an open feel to the area, this new development will give us a feeling of being hemmed in.

## **3, Inadequate parking**

Prince of Wales Drive is already a busy road, especially during the school runs; this additional concentration of traffic will cause traffic problems and create a safety hazard for other motorists.

District local plans have guidelines for how many car parking spaces are needed for example a 3 bed house (2 spaces, with access to a further unassigned space nearby). Looking at the plan, there is not enough spaces and therefore residents will seek parking in Aberdare Close, along Prince of Wales and Chatsworth Crescent.

There have been several accidents and near misses along Prince of Wales Drive when we park along it, not to mention the chaos and arguments we have had when parents pick up and drop off the children on the school runs. At times it is a real battle just to get our cars off our drives. I've been informed that the Police have been called several times because of rising tensions. We have examples where residents have suffered stress because of this. The old Co-op car park is a buffer and is used by teachers from the School.

## **4, Detrimental impact upon residential amenities**

**District Wide Local Plan, Policy states Proposals for development should be of good design and respect the character of the surroundings. Also where it would demonstrably harm the character or appearance of an area or amenities enjoyed by local residents.**

The proposed development/visual impact of the development is out of character with the neighbourhood (we have a balance of bungalows and semi's) it is over-bearing, out-of-scale

or out of character in terms of its appearance compared with existing development in the vicinity.

The loss of existing views from neighbouring properties would adversely affect the residential amenity of neighbouring owners, a feeling of openness in and around the School area.

Building the properties so close to the bottom of our garden will have an adverse effect on the residential amenity of myself and neighbours because of additional noise, disturbance, overlooking, loss of current privacy, a feeling of overshadowing and loss of light.

## 5, Need to avoid Town cramming

The proposed dwellings would significantly alter the fabric of the area and amount to serious 'cramming' in what is an 'open area'. The site plans show very small rear gardens, and incredibly small, if any front gardens. This is totally out of character with the surrounding area. The proposal allows very little space for landscaping and we believe that it would lead to gross over-development of the site.

## 6, Non-compliance with Government guidance

Government Planning Policy States that: The Government is committed to protecting and enhancing the quality of the natural and historic environment, in both rural and urban areas. Planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole. A high level of protection should be given to most valued townscapes and landscapes, wildlife habitats and natural resources.

Government Planning Policy States on Housing that: A good design should contribute positively to making places better for people. Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted. Local planners should encourage development that creates places, streets and spaces which meet the needs of people, are visually attractive, safe, accessible, functional, inclusive, have their own distinctive identity and maintain and improve local character.

We believe the proposal contravenes this guidance as it is to the detriment of the quality, character and amenity value of the area, as outlined in the points above.

We invite you to visit our home to verify that these objections are valid.

Therefore, we ask that Ipswich Borough Council refuse this Planning Application and encourage Boyer to resubmit a plan in another location that will be less intrusive on neighbouring properties, and more sensitive to the character of this area.

Should you require any additional information, clarification of any comments made, or would like to arrange a visit to our home; please do not hesitate to contact us on

Yours Sincerely,  
Terry Forster

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**G**



# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                               |                                                                                                                                                                                         |
|---------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation document(s) to which this comments form relates: | Policies Map<br>Ipswich<br>Planning and Development<br>Ipswich Borough Council                                                                                                          |
| Please return this comments form to:                          | <u>planningpolicy@ipswich.gov.uk</u> or<br><br>Planning Policy Team<br>Planning and Development<br>Ipswich Borough Council<br>Grafton House<br>15-17 Russell Road<br>Ipswich<br>IP1 2DE |
| Return by:                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                         |
| This form has two parts:                                      | Part A – Personal details<br><br>Part B – Your comment(s).                                                                                                                              |

#### PART A PERSONAL DETAILS

|                                       | 1. Personal details  | 2. Agent's details (if applicable) |
|---------------------------------------|----------------------|------------------------------------|
| Title                                 | Caroline Markham Mrs |                                    |
| First name                            | Caroline             |                                    |
| Last name                             | Markham              |                                    |
| Job title (where relevant)            |                      |                                    |
| Organisation (where relevant)         | Geo Suffolk          |                                    |
| Address<br>(Please include post code) | 1 ...                |                                    |
| E-mail                                | < ... >              |                                    |
| Telephone No.                         |                      |                                    |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation (and client if you are an agent):

GeoSuffolk

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.          | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                         |
|-----------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policies Map<br>Keyone<br>area<br>Inset | The key is out of date<br>County Geological Sites and Regionally<br>Important Geological Sites are ALL<br><u>called County Geological Sites now.</u> |
|                                         | <del>WWS</del> The five locations of GGS<br>are correct - only the key is<br>wrong                                                                   |
|                                         |                                                                                                                                                      |
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**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
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Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

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**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

**PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

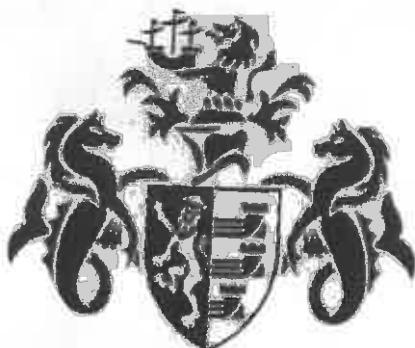
# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 26<sup>th</sup> February 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England)  
Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website: [www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which  
this comments form relates:

Ipswich Plan Consultation

Failed to assess the needs and concerns relating to the  
safeness of the Fonnerau Way

We wish to make a representation seeking a  
modification to the plan or part of the plan as the  
current option thru broad acres farm is unsound.

Please return this comments form  
to:

[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk) or

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

Return by:

11.45pm Wednesday 26<sup>th</sup> February 2020

Part A – Personal details

Part B – Your comment(s).

**PART A PERSONAL DETAILS**

| Title                                 | 1. Personal details | 2. Agent's details (if applicable) |
|---------------------------------------|---------------------|------------------------------------|
| First name                            | MR                  |                                    |
| Last name                             | PAUL                |                                    |
| Job title (where relevant)            | GILBERT             |                                    |
| Organisation (where relevant)         | Retired             |                                    |
| Address<br>(Please include post code) | NFT                 |                                    |

|                                                                                |      |
|--------------------------------------------------------------------------------|------|
| <b>PART B</b> Comment(s) about the Ipswich Local Plan Final Draft Consultation |      |
| Your name or organisation<br>(and client if you are an agent):                 | none |

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Fonnerau way.                  | <p>Both my wife and I would like to express our concerns to the planners and council during this final consultation period as the need for a safer pedestrian way and cycle track other than Broad acres Farm entrance on Lower Rd in Westerfield. Northern end of Fonnerau way.</p> <p>The council has failed to assess the needs as the current foot path access is definitely unsuitable for a cycle track we can vouch for that, as when we walked this route once we had to negotiate 2 moving cars and a horse being moved which made us scared. We understand this is someone's home and they have the right to move their horse, but there is no value enjoyment or country feel about being in the country walking through someone's home, whereas the rest of the Fonnerau way does not go through someone's home and runs along side beautiful fields where wildlife and be seen.</p> <p>We saw the plans in Ipswich recently and were told that a new pedestrian way and cycle track would be opening up on Lower Road, avoiding Broad acres Farm, thus leading directly into the park area. What could be better and safer I ask myself as this would be our preferred option and I am sure many others would agree with us.</p> <p><b>Conclusion:</b> The plan must be altered as to show the new safer route as we want safety first please after all Ips council has a duty to ensure users of these routes are safe.</p> |

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final  
Draft**

| <b>Document(s)<br/>and<br/>document<br/>part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your<br/>name is included on any additional sheets.)</b> |
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Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Wednesday 26<sup>th</sup> February 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

**PRIVACY NOTICE**

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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>Ipswich Local Plan Review – Submission version and associated evidence base.</b>                                                                                                                                                                     |
| <b>Please return this comments form to:</b>                          | <b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b><br><br><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                         |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                                |

| <b>PART A PERSONAL DETAILS</b>                |                                                                 |                                           |
|-----------------------------------------------|-----------------------------------------------------------------|-------------------------------------------|
|                                               | <b>1. Personal details</b>                                      | <b>2. Agent's details (if applicable)</b> |
| <b>Title</b>                                  | Mr                                                              |                                           |
| <b>First name</b>                             | John                                                            |                                           |
| <b>Last name</b>                              | Fleming                                                         |                                           |
| <b>Job title (where relevant)</b>             | Policy Planner                                                  |                                           |
| <b>Organisation (where relevant)</b>          | Gladman Developments                                            |                                           |
| <b>Address<br/>(Please include post code)</b> | Gladman House, Alexandria Way,<br>Congleton, Cheshire, CW12 1LB |                                           |
| <b>E-mail</b>                                 |                                                                 |                                           |
| <b>Telephone No.</b>                          |                                                                 |                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                      |
|----------------------------------------------------------------------|----------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Gladman Developments |
|----------------------------------------------------------------------|----------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.  | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                     |
|---------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Local Plan – Submission version | <p>Please see attached representations. Gladman would also like to request to participate at the hearing sessions at the Examination in Public to discuss the issues raised.</p> |
|                                 |                                                                                                                                                                                  |
|                                 |                                                                                                                                                                                  |

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|
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Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

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Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

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**Ipswich**  
**Local Plan Review**  
**Publication Draft Plan**



**February 2020**

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### Appendices

Appendix 1: Orwell Green Framework Plan

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## 1 INTRODUCTION

### 1.1 Context

- 1.1.1 These representations are submitted by Gladman in response to the Ipswich Local Plan Review (ILPR) Publication Draft consultation.
- 1.1.2 Gladman has considerable experience in the development industry across a number of sectors including residential and employment development. From that experience, we understand the need for the planning system to ensure that residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic development.
- 1.1.3 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure. Gladman also has a wealth of experience in contributing to the development plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of that experience that the comments are made in these representations.
- 1.1.4 Through this submission, Gladman have highlighted areas where the Local Plan's policies require further clarity or justification in order to be found sound at Examination, namely the need for an effective approach to cross boundary strategic issues. As such, Gladman formally request that we are afforded the opportunity to discuss the issues raised at the Local Plan examination public hearing sessions.

### 1.2 Structure of representations

- 1.2.1 These representations are structured to follow the consultation document where possible and will cover the following key topic areas:
- National Planning Policy and Guidance
  - Legal Compliance – Duty to Cooperate and Sustainability Appraisal
  - Housing delivery and detailed policies
- 1.2.2 In addition, Gladman have provided details of two strategic sites that we are promoting to the neighbouring districts of Babergh and East Suffolk within Section 6 below. Both sites are ideally located to assist Ipswich Borough in meeting its development needs over the plan period through joint working with its neighbouring districts under the Duty to Cooperate.

## 1.3 Plan Making

1.3.1 The NPPF19 sets out the four tests which a Local Plan must meet to be considered sound:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

## 1.4 Overview of Soundness

1.4.1 Given that this is the Publication Draft of the ILPR it is of critical importance to consider these tests and whether the proposed policies and allocations would be meeting these at the point that the plan is examined. Due to the issues raised through this submission and summarised in Table 1 below, Gladman consider it necessary that we are given the opportunity to discuss our representations further at the Examination in Public in due course.

| Policy                               | Sound / Unsound / Comment | Test of Soundness                                                             | Reason                                                                                                                                                                                                                              |
|--------------------------------------|---------------------------|-------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy CS2 – Location of development | Unsound                   | Justified, effective, positively prepared and consistent with national policy | This policy fails to fully reflect and address the wider strategic priorities. The Local Plan strategy must be revised so that it addresses unmet housing needs arising from the Borough.                                           |
| Policy CS7 – Housing requirement     | Unsound                   | Justified, effective, positively prepared and consistent with national policy | The policy fails to succinctly set out how the LPAs within the ISPA will ensure housing needs will be met in full over the plan period. The stepped trajectory is not soundly based as it will delay the delivery of housing needs. |
| Policy CS10 – Ipswich Garden suburb  | Comment                   | Justified, effective, positively prepared and consistent with national policy | The Council and its neighbouring authorities have failed to consider alternative sustainable growth opportunities to meet unmet housing needs over the plan period.                                                                 |
| Policy CS12 – Affordable housing     | Unsound                   | Justified, effective, positively prepared                                     | The level of affordable housing to be delivered by this policy will fail to meet the affordable housing needs of the Borough.                                                                                                       |

|                                                   |         | <b>and consistent with<br/>national policy</b>                                         |                                                                                      |
|---------------------------------------------------|---------|----------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| <b>Policy CS13 –<br/>Economic<br/>development</b> | Unsound | Justified, effective,<br>positively prepared<br>and consistent with<br>national policy | The Local Plan needs to promote a strategy<br>which encourages economic development. |

Table 1

## 2 NATIONAL PLANNING POLICY

### 2.1 Revised National Planning Policy Framework

- 2.1.1 On 24<sup>th</sup> July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework (NPPF18). This publication formed the first revision of the Framework since 2012 and implemented changes informed by the housing white paper (2017)<sup>1</sup>, the 'Planning for the right homes in the right places' consultation (2017) and the draft NPPF (2018) consultation.
- 2.1.2 The 2018 version of the NPPF was itself superseded on 19<sup>th</sup> February 2019, with the latest version amending policy regarding Appropriate Assessment, as well as other minor clarifications to wording. These representations have been prepared on the basis of the revised NPPF (NPPF19) and unless otherwise stated any NPPF references are in relation to the 2019 version of the national policy.
- 2.1.3 The revised Framework introduces a number of major changes to national policy. The changes reaffirm the Government's commitment to ensuring up-to-date plans are in place which provides a positive vision for the areas they cover. These should outline the housing, economic, social and environmental priorities to help shape future local communities. In particular, paragraph 16 of the NPPF states that Plans should:
- "be prepared with the objective of contributing to the achievement of sustainable development;
- be prepared positively, in a way that is aspirational but deliverable;
- be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- be accessible through the use of digital tools to assist public involvement and policy presentation; and

<sup>1</sup> Department for Communities and Local Government. (2017). 'Fixing our broken housing market'. Available at: <https://www.gov.uk/government/publications/fixing-our-broken-housing-market/>.

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**serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."**

- 2.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can come forward where it is needed and that the needs of groups with specific housing requirements are addressed and land with permission is developed without unnecessary delay.
- 2.1.5 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. It states:

**"Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:**

- a) **specific, deliverable sites for years one to five of the plan period; and**
- b) **specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."**

- 2.1.6 Once a local planning authority has identified its housing needs, these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and AONB and giving consideration as to where or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, resulting in net gains across all three. Adverse impacts on any of these dimensions should be avoided but where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered.

## **2.2 Planning Practice Guidance**

- 2.2.1 The Planning Practice Guidance (PPG) provides additional guidance to be read alongside the NPPF. Numerous updates have been made to the PPG in September 2018 to reflect the changes in approach

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brought through the revised NPPF. Further changes have been made to the PPG throughout 2019.  
Relevant references from the guidance contained in the PPG are made within this submission.

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## 3 LEGAL REQUIREMENTS

### 3.1 Sustainability Appraisal

- 3.1.1 In accordance with Section 19 of the Planning and Compulsory Purchase 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 3.1.2 The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the ILPR proposals on sustainable development when judged against all reasonable alternatives. The Council must ensure that the future results of the SA clearly justify its policy choices. In meeting development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. This must be undertaken through a comparative and equal assessment of all reasonable alternatives, in the same level of detail for both chosen and rejected alternatives. The Council's decision making, and scoring should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often the SA process flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.
- 3.1.3 In accordance with the SEA Regulations, the Council must take account of all reasonable alternatives when assessing and selecting their preferred policy choice. It is integral to this process that each reasonable alternative is assessed to the same degree of detail as the authority's preferred option and should only be rejected after a fair and comparable assessment of its sustainability credential.

### 3.2 Duty to Cooperate

- 3.2.1 The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.
- 3.2.2 The NPPF (2018) had introduced a number of significant changes on how local planning authorities are expected to cooperate, including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The NPPF (2019) sets out that local planning authorities should produce, maintain and update

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one or more SoCG throughout the plan making process. The SoCG should provide a written record of the progress made by the strategic plan making authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the lengths local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with i.e. unmet housing needs.

- 3.2.3 As demonstrated through the outcome of the St Albans Local Plan examination, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This legal test cannot be rectified through modifications.
- 3.2.4 Gladman recognise that the DtC is a process of ongoing engagement and collaboration as set out in the PPG It is clear that the Duty is intended to produce effective policies on cross boundary strategic matters. In this regard, the Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint work arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation to ensure that the borough's housing needs are met in full.
- 3.2.5 Any issues of unmet housing need arising from relevant neighbouring local authorities must be fully considered through the preparation of the Local Plan, working under the auspices of the DtC and agreements and evidenced through SoCG. To achieve this, it is vital that this matter is carefully explored through joint working with all other local planning authorities within the HMA, together with any other relevant local authorities that the HMA has a clear functional relationship with. Where necessary, a strong policy mechanism will be required within the Local Plan to demonstrate that unmet housing needs arising from relevant neighbouring authorities and those with a clear functional relationship will be met during the plan period.
- 3.2.6 In light of the above it is noted that the starting point in the wider strategic planning area (covering East Suffolk, Mid Suffolk District Council and Babergh District) is for local authorities to meet their own housing needs within their own boundary. However, the ability of Ipswich Borough to meet its development needs in full over the plan period requires the commitment of neighbouring authorities to assist in meeting its housing needs due to the nature of the administrative boundary.
- 3.2.7 It is recognised that the local authorities of Babergh, Mid Suffolk, Suffolk Coastal, Ipswich and Suffolk County signed a MoU in June 2016, which sought to ensure an approach whereby strategic local planning policy becomes consistent across the local authority areas. The proposed approach formed a useful starting point in ensuring that strategic priorities across the local authority boundaries can be properly coordinated and clearly reflected in a joint Local Plan or through aligned Local Plans. Gladman recognise that collaborative work has been undertaken between the Council and its

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neighbouring authorities during the plan making process. A series of MoUs and SoCGs have been published during the course of plan's preparation. Paragraphs 25 and 26 of the Framework state that:

**"25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans..."**

**26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs cannot be met wholly within a particular plan area could be met elsewhere."**

- 3.2.8 This element of national policy is pertinent to the production of local plans across the area that is covered by the Ipswich Strategic Planning Board because they embrace shared growth and infrastructure delivery ambitions and priorities for the 'Wider Strategic Planning Area'. Having identified shared strategic matters, there is a need to address these through individual local plans in partnership. It therefore follows that strategic priorities must be fully embraced and supported through the spatial strategies of the local plans that are brought forward by individual authorities and through the associated decision-making processes that inform the Plan's preferred spatial development options. In its current form, the ILPR fails to achieve this because it does not form a strategy that will provide the necessary certainty that is needed to ensure that the minimum housing requirement across the Ipswich Housing Market Area can be achieved in full over the plan period. From the outset of the plan making process, the local authorities within the IPSA have been aware of the issue relating to the unmet needs arising from Ipswich over the plan period. Whilst it is unfortunate that the timescales for the production of the ILPR have fallen behind that of neighbouring authorities, the issue of unmet housing needs arising from Ipswich will still need to be considered at the Local Plan Examination. The need to address this issue goes to the heart of soundness of the Plan and its effects on the wider IPSA. Indeed, there are practical and sustainable options available to be considered in neighbouring authorities that can accommodate housing needs over the plan period in a sustainable manner, which can support wider infrastructure improvements, including at key junctions on the A14 which is an important cross boundary issue.
- 3.2.9 Whilst collaboration between the IPSA authorities has occurred it has not resulted in effective and concrete outcomes to ensure the housing needs of the HMA will be delivered in full. This issue will be explored in greater detail in section 4 of these representations.

## 4 IPSWICH LOCAL PLAN REVIEW

### 4.1 Context

- 4.1.1 This section is in response to the ILPR consultation document and its supporting evidence base. Gladman highlight below concerns and set out where we feel modifications will need to be made for the plan to be found sound.

### 4.2 Policy CS1: Sustainable Development

- 4.2.1 In principle, Gladman are supportive of the direction taken in Policy CS1, which sets out that decisions will be made in accordance with the presumption in favour of sustainable development and affirms the Council's commitment to making local planning decisions based on the delivery of sustainable development. The inclusion of such a policy provides assurance of a local approach to planning that will actively seek to improve the social, environmental and the economic wellbeing of the area by ensuring that development demonstrably contributes to the delivery of sustainable development within the Borough.
- 4.2.2 Notwithstanding this, Gladman believe that the policy should go further in its approach to ensuring the delivery of sustainable development is consistent with a localised approach to assessing development proposals in line with the ethos of achieving the delivery of sustainable development as required by the NPPF2019 which is key to assessing planning proposals and should be reflected in the policy wording linked to the vision and objectives of the Plan. In this regard, Gladman refer to the Sustainable Development Statement contained in the draft Durham Local Plan currently subject to examination. This is an effective example of a local approach of how development proposals will be considered against the presumption outlined in national policy. It is recommended that similar criteria that are relevant to Ipswich be included in the policy wording to demonstrate how a localised approach will be taken through the development management process.

### 4.3 Policy CS2: The Location and Nature of Development

- 4.3.1 Policy CS2 sets out the Council's approach to regeneration and the sustainable growth of Ipswich will be achieved by a variety of measures. These include, but are not limited to, regeneration areas, the allocation of sites at the northern end of Humber Doucy Lane phased in alignment with the delivery of the Ipswich Garden Suburb subject to the provision of suitable infrastructure. In addition, it is noted that Policy CS2 requires the local planning authority to work with neighbouring authorities to address housing need and delivery within the Ipswich housing market area.

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- 4.3.2 In principle, Gladman approve of the recognition within Policy CS2 for the Council to work with neighbouring authorities to address housing need and delivery within the Ipswich HMA. However, it is concerning that the Plan fails to provide a positive and effective mechanism to ensure the delivery of the HMA's housing needs in full. Indeed, this issue was recently highlighted in the Inspector's Post Hearing letter to the Suffolk Coastal Local Plan which specifically states that the Plan should be amended to include an immediate review of the Plan or relevant strategic policies, which would be triggered at the point where it is established through the adoption of a development plan that there are unmet needs arising in a neighbouring authority area in the HMA.
- 4.3.3 It is considered that the proposed approach as submitted risks the deliverability of the Plan through the stepped housing trajectory and the reliance on a Sustainable Urban Extension to north Ipswich which is heavily reliant on the provision of new and improved infrastructure. These issues are discussed in detail in section 4.4 below.

## 4.4 Policy CS7: The Amount of New Housing Required

### Background

- 4.4.1 Policy CS7 of the adopted Ipswich Core Strategy sets out an interim housing target of 9,777 dwellings over the period 2011-2031 i.e. 489dpa. At the time of the adoption of the Core Strategy and Site Allocations DPD, the Council was unable to demonstrate a five year housing land supply in the context of paragraph 47 of the NPPF 2012. Due to the constrained nature of the borough's administrative boundary the Council was required to review its Local Plan in order to review objectively assessed needs for housing, employment land and new retail floorspace in the short term working in partnership with neighbouring authorities under the auspices of the Duty to Cooperate to ensure the HMA's housing needs are met in full over the plan period.

### Housing Requirement

- 4.4.2 Policy CS7 of the emerging Local Plan seeks to deliver a housing requirement of at least 8,010 dwellings over the period 2018 to 2036. This equates to an annual average of at least 445 dwellings per annum a figure which is significantly less than the adopted Core Strategy housing requirement. However, the housing target is significantly reliant on the Ipswich Garden Suburb and Ipswich One area which allocates land for approximately 3,500 dwellings.
- 4.4.3 The housing figure contained in the emerging ILPR is derived from the Government's Standard Method. However, the PPG is clear that the need figure generated by the standard method should only be considered as the minimum starting point in establishing a housing requirement figure as it does not take into consideration matters which will influence demographic behaviour such as

economic growth strategies, affordable housing needs, strategic level infrastructure etc. which are likely to increase housing needs.

**4.4.4** The supporting text to this policy states at paragraph 8.106 that the Council does not consider that it should plan for a higher level of housing need than the standard method suggests. However, the adopted Core Strategy and the options considered as part of the SA demonstrate the Council could plan for a higher level of housing need than the standard method suggests. In addition, we would question how the proposed housing requirement has been aligned with the Council's economic growth agenda given that the Plan's vision and objectives seek to boost economic diversity across the Borough.

#### Stepped Trajectory

**4.4.5** The Council is seeking to 'step' the annual housing requirement as follows:

- From April 2018 – March 2024 – 300dpa (i.e. 1,800 dwellings)
- From April 2024 – March 2036 – 518dpa (i.e. 6,216 dwellings)

**4.4.6** The PPG<sup>2</sup> is clear that a stepped housing requirement may only be appropriate where there is a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period.

**4.4.7** Although the Council state that Ipswich Garden Suburb will deliver later in the plan period the PPG further states that that policy-makers should set out evidence to support a stepped approach and are not seeking to unnecessarily delay meeting identified development needs. With that being said, Ipswich has a historic under-delivery of housing against the adopted Core Strategy housing requirement of 489dpa, as detailed in table 2 below:

| Year    | Housing Completions | Affordable Housing Completions | Housing Completions within IP- One area |
|---------|---------------------|--------------------------------|-----------------------------------------|
| 2011/12 | 283                 | 152                            | 51                                      |
| 2012/13 | 100                 | 7                              | 13                                      |
| 2013/14 | 228                 | 44                             | 117                                     |
| 2014/15 | 470                 | 202                            | 318                                     |
| 2015/16 | 496                 | 133                            | 237                                     |
| 2016/17 | 256                 | 4                              | 109                                     |

<sup>2</sup> Planning Practice Guidance Paragraph: 021 Reference ID: 68-021-20190722

|         |      |     |     |
|---------|------|-----|-----|
| 2017/18 | 141  | 20  | 71  |
| Total   | 1974 | 562 | 916 |

**Table 2 – Housing Delivery Record In Ipswich. Source: Annual Monitoring Report 13 2017/18 June 2019**

- 4.4.8 Measured against the adopted Core Strategy requirement of 489dpa, only in the 2015/16 monitoring year has that target been achieved. The IP-One area has delivered 46% of the homes in the Borough since 2011, some way off the 74% that the Council is relying on for the remainder of the Plan period. Even set against the lower emerging housing need of 445dpa, the Council's historic delivery does not suggest that the Borough's housing need will be delivered as they are relying on historic sites with known issues as a continuation of the existing spatial strategy. The Council's delivery record should have very clearly pointed the Council towards actively pursuing an alternative strategy to what is now being proposed and through the agreement to export housing needs to neighbouring areas in line with the requirements of national policy and guidance. Based on the Council's previous housing delivery, the Council needs to constructively work with its neighbours through their respective plan making process to ensure that housing needs (including affordable needs) of Ipswich can be met in full without unnecessary delay.
- 4.4.9 Furthermore, the historic completions data suggests that the Council's proposed stepped housing requirement will continue to delay meeting identified housing needs of the borough and therefore conflicts with the advice detailed in the PPG. Furthermore, a continued reliance on the IP-One area to deliver homes in Ipswich is unfounded and unrealistic and further distribution across the HMA is required.
- 4.4.10 Gladman note paragraph 8.151 of the ILPR that the Ipswich SHMA 2017 Part 2 Report identifies the total annual affordable housing need in Ipswich is 239 households per year, which represents 47.9% of the annual projected household growth in the Borough between 2014 and 2036 identified through the SHMA and around 50% of the need identified using the standard method. Through Policy CS12 the Council is seeking to secure 30% affordable housing on the new Garden Suburb and 15% in all other locations. The Council's housing requirement will therefore fail to meet the affordable housing needs of the borough. Gladman recommend that the stepped trajectory is deleted as it unnecessarily delays housing delivery, including affordable housing delivery.

## 4.5 Policy CS8: Housing Type and Tenure

- 4.5.1 In principle, Gladman support Policy CS8 as currently proposed which seeks to ensure an appropriate mix of homes by size and type is provided in accordance with the SHMA or any up to date evidence of local needs supported by the Council and the policies of the plan.

- 4.5.2 Notwithstanding this, it is noted that the Council will support the provision of Self-build/Custom build homes and on major applications will consider the currently applicable self-build register and whether provision should be included within the development proposal. This element of the policy lacks clarity on whether self-build plots should be provided on site. The Council's Self Build Register identifies 70 interested persons which does not indicate a strong demand for this form of housing.
- 4.5.3 Whilst it supported that the Council should be seeking to encourage the delivery of this form of housing, it is recommended that this element of the policy is modified so it is at the discretion of the developer to provide self-build homes on site. Indeed, Gladman would not be supportive of an approach which requires all development to provide Self-build homes as there are difficulties in terms of potential health and safety concerns and also the practical difficulties in terms of aligning their development with construction activity on the site.

#### **4.6 Policy CS10: Ipswich Garden Suburb**

- 4.6.1 Gladman notes the Council's continued approach to shape the delivery of the Ipswich Garden Suburb. In principle, Gladman has no objections to the allocation of a new settlement as outlined in the proposed policy wording. However, it is essential that the Council has considered all options available for development and it is essential that realistic delivery assumptions have been applied to the sites delivery. This issue is considered in more detail in section 5 of these representations.

#### **4.7 Policy CS12: Affordable Housing**

- 4.7.1 Gladman note the intention of this policy is to ensure a choice of homes is available to meet identified affordable housing needs in Ipswich. However, the Council's approach as currently proposed is not effective given the level of affordable housing needs within Ipswich will not be met over the plan period.
- 4.7.2 Gladman consider that the Council will need to proactively address this situation if it is to meet the housing market areas full housing needs. Indeed, paragraph 60 of the Framework is clear that in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. As such, it is essential that the Council allocate additional housing land to make a meaningful contribution to the Council's housing land supply and to boost affordable housing delivery. Gladman reiterate that this is an issue that will need to be informed through continued cross-boundary working with neighbouring authorities as this issue can be addressed through the allocation of sites within the vicinity of Ipswich within neighbouring districts such as the Orwell Green Garden Village.

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## **4.8 Policy CS13: Planning for Jobs Growth**

- 4.8.1 Policy CS13 seeks to promote sustainable economic growth in the Ipswich Strategy Planning Area. It is noted that the Council has updated its economic evidence as a result of the more recent East England Forecasting Model (EEFM) dataset being published. This has reduced the jobs growth from 15,580 jobs to 9,500 jobs over the plan period. Gladman consider the Plan should be aspirational and should be seeking to increase jobs growth as identified in the preferred options plan as a minimum in order to meet the visions and objectives of the Plan to increase economic activity and access to employment.

## **4.9 Policy DM4: Development and Flood Risk**

- 4.9.1 Gladman note the Council's proposed approach to flood risk management that is set out through Policy DM4. Gladman remain concerned that the Plan is relying on the delivery of housing from a number of sites in high risk flood zones. The Council suggests that it has undertaken sequential and exception tests as required by the NPPF, but in accepting the needs of Ipswich will at least in part need to be met outside of the Town's constrained boundary, the Council should look to identify additional sites outside of its boundary in collaboration with neighbouring authorities that are more suitable for residential development than those that are at high risk of flooding within its boundary.

## 5 GENERAL MATTERS

### 5.1 Housing Delivery

- 5.1.1 Gladman note the intention to allocate these sites within the Local Plan for residential use and associated community infrastructure over the plan period. As evidence through the Report prepared by Planning Prospects on behalf of Gladman<sup>5</sup>, there are fundamental concerns regarding the ability of these sites to viably deliver residential development over the plan period and over whether there is a demand for the type of homes that these sites can offer.
- 5.1.2 Due to the constrained nature of the borough boundary, the Council recognises that it has limited capacity for future development and will need to look beyond its administrative boundaries working in collaboration with neighbouring authorities to ensure housing needs are delivered in full.

#### Housing Land Supply

- 5.1.3 Whilst Gladman welcome the decision to include a 10% contingency within the Council's housing land supply, it is not evident from the evidence provided in the Housing Topic Paper as to which sites within the Council's housing land supply will come forward within the next five years following the adoption of the Local Plan and whether these sites are subject to extant permissions or proposed allocations. Neither the Council's SHLAA nor the Housing Topic Paper provide the necessary detail as required by the NPPF 2019. As such, Gladman reserve the right to provide comments on this matter should additional evidence be provided.

#### Housing Delivery Strategy

- 5.1.4 In addition to the Ipswich Garden Suburbs, Policy SP2 of the Site Allocations Review provides site allocations that the Council anticipates will deliver 2,750 homes in the Plan period, a reduction from 3,297 homes that were set out in the same policy in the Preferred Options Development Plan Review Documents published in November 2018. In addition, Policy SP3 highlights land with 'Land with planning permission or awaiting a Section 106 Agreement'. It is noted that should the permissions fail to be issued or implemented and lapse during the plan period or the development fail to come forward or be completed in accordance with the permission, the Council will protect the sites for residential use or residential-led mixed use. Sites included within Policy SP3 account for 1,470 dwellings over the plan period.

<sup>5</sup> See Gladman's representations to the Regulation 18 consultation – Appendix 1

- 5.1.5** Planning Prospects were instructed by Gladman to produce an assessment of the deliverability of residential sites put forward for allocation by Ipswich Borough Council in their Preferred Options Development Plan Review Documents published for consultation in November 2018.
- 5.1.6** Planning Prospects' analysis of the Council's suggested SP2 sites shows that there are many sites that cannot be relied upon to deliver homes over the emerging Plan period. For example, a number of the SP2 sites are unavailable and require existing occupiers to relocate and others are heavily constrained by designated heritage assets and areas of archaeological importance. These are significant constraints that impact the delivery of homes from these sites in principle.
- 5.1.7** Appendix 1 Planning Prospects' report details proformas for allocated sites within SP2 discussing deliverability and viability, before Appendix 2 provides a table detailing Site Indicative Deliverability Comparison between the Council's proposed figures and Planning Prospects' analysis. In March 2019 when this report was conducted it was evident that the sites were ineffectively assessed often assuming complete site coverage or very high densities without considering the amount of land required to avoid constraint impacts. Furthermore, the Council is relying on delivery from a number of sites in high flood risk zones which have significant viability and deliverability concerns.
- 5.1.8** Gladman contend that Ipswich Borough Council must look outside of the Borough's boundary to enable the town's housing need to be met and identify land outside of its boundary that are more suitable for residential development.
- 5.1.9** The notion that the housing strategy set out in the emerging Local Plan Review cannot be relied upon is exacerbated by the fact that a number of sites have been removed from Policy SP2 since the Preferred Options document published in 2018.
- 5.1.10** The sites listed in table 3 below were included within SP2 in the Preferred Options document but now have been removed or are no longer available for residential development.

| Site Reference | Number of Dwellings | Planning Prospects Analysis                                                                                                                                                                                                                               | Current Status                                  |
|----------------|---------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| IPO28a         | 11                  | Previous approved schemes have not been delivered. A large area of the site is in Flood Zones 2 and 3 (highest risk). There is no evidence to assume that an 11 unit proposal is viable and residential development is unsuitable in Flood Zones 2 and 3. | Not included in the latest version of the plan  |
| IPO29          | 45                  | For this reason, the proportion of the site considered developable has been reduced                                                                                                                                                                       | No longer included in the plan as available for |

|       |    |                                                                                                                                                                                                                                  |                                                                                |
|-------|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
|       |    | from the 2017 Local Plan. A small area is at high risk of surface water flooding. The site also has potential wildlife interest. It cannot be assumed that the site can deliver 45 homes in light of the constraints identified. | residential development and is noted as an employment allocation in Policy SP% |
| IP346 | 88 | This site is adjacent to the River Grippen. There appears to be existing occupiers which would need to be relocated. Availability of the site is unknown                                                                         | The site is no longer included in the latest version of the plan.              |

**Table 3- Sites removed from Policy SP2**

- 5.1.11 A number of sites are now detailed within the Core Strategy Review Policy SP4 'Opportunity Sites' Four opportunity sites have been identified within IP-One that have potential for housing-led redevelopment and would contribute to the regeneration of the Waterfront and Town Centre. The Council will work with landowners and other interested parties to investigate opportunities and bring them forward through the development management process, taking into account constraints set out in the Appendix 4 site sheets.
- 5.1.12 Planning Prospects found that none of these sites were deliverable or viable. Significantly Site IP226 which has an indicative capacity of 337 dwellings, has a non-implemented application for 556 homes, been allocated but has not achieved any housing completions over the last 20 years, requires business relocation and lies entirely within Flood Zone 3. Given the site's history and constraints identified residential development cannot be assumed as suitable or viable.
- 5.1.13 The above information alongside Planning Prospects' report suggests that the Council's current and continued strategy for delivering homes is flawed. The Council by their own admission in removing sites from the Local Plan submission draft version have significant concerns over the viability and deliverability of numerous sites within the Core Strategy Review, which cannot be relied upon to deliver homes over the emerging plan period.
- 5.1.14 Therefore, the Council must look to identify significantly more sites, which are realistically deliverable and outside of the Borough's boundary to meet Ipswich housing needs.

#### **Delivery Assumptions**

- 5.1.15 The Council contend that the tight urban boundary to Ipswich Borough means that there is only one area of extensive greenfield land available on the periphery of the town and within the Borough. That land is the Ipswich Garden Suburb. Policy CS10 of the Core Strategy and Policies DPD Review Final

Draft states that the Ipswich Garden Suburb will incorporate residential development of approximately 3,500 dwellings.

- 5.1.16** The Ipswich Authority Monitoring Report 13 2017/18 (June 2019) housing trajectory sets out that the Council expect the Ipswich Garden Suburb to deliver homes at the following rate:

| Year           | Phase      |                 |              | Total       |
|----------------|------------|-----------------|--------------|-------------|
|                | Mersea     | Crest Nicholson | Other Source |             |
| <b>2018/19</b> | 0          | 0               | 0            | <b>0</b>    |
| <b>2019/20</b> | 0          | 10              | 0            | <b>10</b>   |
| <b>2020/21</b> | 0          | 60              | 40           | <b>100</b>  |
| <b>2021/22</b> | 45         | 90              | 75           | <b>210</b>  |
| <b>2022/23</b> | 45         | 90              | 75           | <b>210</b>  |
| <b>2023/24</b> | 45         | 90              | 75           | <b>210</b>  |
| <b>2024/25</b> | 75         | 90              | 80           | <b>245</b>  |
| <b>2025/26</b> | 75         | 90              | 75           | <b>240</b>  |
| <b>2026/27</b> | 75         | 90              | 75           | <b>240</b>  |
| <b>2027/28</b> | 75         | 90              | 75           | <b>240</b>  |
| <b>2028/29</b> | 90         | 90              | 75           | <b>255</b>  |
| <b>2029/30</b> | 90         | 90              | 75           | <b>255</b>  |
| <b>2030/31</b> | 90         | 90              | 75           | <b>255</b>  |
| <b>2031/32</b> | 90         | 90              | 65           | <b>245</b>  |
| <b>2032/33</b> | 90         | 40              | 140          | <b>270</b>  |
| <b>2033/34</b> | 90         | 0               | 125          | <b>215</b>  |
| <b>Total</b>   | <b>975</b> | <b>1,100</b>    | <b>1125</b>  | <b>3200</b> |

**Table 1- Projected Ipswich Garden Suburb Delivery Rate. Source: Authority Monitoring Report 13 2017/18 June 2019**

- 5.1.17** In total, the Council's AMR trajectory sets out that 3,200 homes will be delivered from the Ipswich Garden Suburb to 2034, leaving a residual requirement of 300 dwellings over the remaining two years of the plan period.
- 5.1.18** The PPG states that the advice of developers and local agents will be important in assessing lead in times and build out rates by year<sup>4</sup>, whilst previous versions of the PPG have suggested that Local

<sup>4</sup> Planning Practice Guidance Paragraph: 022 Reference ID: 3-022-20190722

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Authorities should consider the local delivery record when considering the future housing delivery assumptions.

- 5.1.19 Setting realistic delivery assumptions, including annual delivery rates and lead-in times for first completions to come forward, is necessary to project the number of homes that the sites identified by the Council can reasonably be expected to deliver both in the five year period and for the entire Plan period.
- 5.1.20 As discussed by Planning Prospects, historically Ipswich Borough has not delivered any large sites that are comparable to the scale proposed for the Ipswich Garden Suburb. Yet, the Council has no reasonable empirical evidence or experience to base their delivery assumptions for the Garden Suburb, or to critique any assumptions being made by its developers and promoters, the potential for planning harm from unrealistic delivery assumptions is increased.
- 5.1.21 Given that there is no evidence of delivery in Ipswich Borough from site scale comparable to the Ipswich Garden Suburb it is useful to refer to national evidence and average delivery rates. Planning Prospects assessed research undertaken by Lichfields in their 2016 'Start to Finish' report which includes an assessment of the average delivery rates of large housing sites across the UK. The Lichfields Report suggests that on sites of 2,000 or more dwellings, the average annual delivery rate is 171 homes per annum. Using this figure as a reasonable delivery assumption would significantly delay the delivery of housing at the Ipswich Garden Suburb in comparison to the Council's own trajectory.
- 5.1.22 Furthermore, in September 2019, Babergh and Mid Suffolk published their Housing Land Supply Position Statement<sup>5</sup>. Section 5 of this document provided analysis of national evidence on the delivery of housing using research documents and national housebuilder statements to inform average delivery rates nationally. Table 3 of this document details the average national delivery contained within these reports of sites of 500 dwellings or more, suggesting an average annual delivery rate of similar sized sites of approximately 150 dwellings.
- 5.1.23 The Ipswich Garden Suburb timescales for delivery within the latest AMR document have already been set back from the previous document published in 2018, this on its own evidences that the delivery assumptions for the Garden Suburb are over optimistic. It is strikingly clear that the Council's assumptions made in respect of the housing trajectory risks the deliverability of the Local Plan (and the Local Plan as a whole) and will inevitably lead to further housing land supply problems in the future. Table 4 below provides a comparison between the Council's position on the Garden Suburb at

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<sup>5</sup> Babergh Housing Land Supply Position Statement <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-District-Council-Housing-Land-Supply-Position-Statement-Sep-2019.pdf>

the point of the Local Plan adoption and the evidence informing the submission version of the emerging ILPR. The Council's position demonstrates a shift in the anticipated delivery rates and are now extended towards the end of the plan period.

| Ipswich Garden Suburb          | 2015/16  | 2016/17  | 2017/18  | 2018/19    | 2019/20    | 2020/21    | 2021/22    | 2022/23    | 2023/24    | 2024/25    | 2025/26    | 2026/27    | 2027/28    | 2028/29    | 2029/30    | 2030/31    | 2031/32    | 2032/33    | 2033/34    | Total       |
|--------------------------------|----------|----------|----------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|-------------|
| Land west of Westerfield Road  | 0        | 0        | 0        | 316        | 316        | 106        | 300        | 300        | 200        | 300        | 91         |            |            |            |            |            |            |            |            | 835         |
| South of River Waveney Line    | 0        | 0        | 0        | 0          | 0          | 0          | 42         | 300        | 300        | 200        | 200        | 199        | 173        | 150        | 150        | 150        | 150        | 150        | 150        | 1885        |
| Central Ipswich North Research | 0        | 0        | 0        | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0          | 0           |
| <b>AMR 2015 Total</b>          | <b>0</b> | <b>0</b> | <b>0</b> | <b>305</b> | <b>306</b> | <b>947</b> | <b>300</b> | <b>300</b> | <b>200</b> | <b>300</b> | <b>299</b> | <b>299</b> | <b>173</b> | <b>150</b> | <b>150</b> | <b>150</b> | <b>150</b> | <b>150</b> | <b>150</b> | <b>2700</b> |
| Messing                        | 0        | 0        | 0        | 0          | 0          | 0          | 43         | 43         | 43         | 70         | 25         | 25         | 25         | 25         | 25         | 25         | 25         | 25         | 25         | 175         |
| Cresswellham                   | 0        | 0        | 0        | 0          | 0          | 0          | 10         | 60         | 93         | 93         | 93         | 93         | 93         | 93         | 93         | 93         | 93         | 93         | 93         | 1100        |
| Other                          | 0        | 0        | 0        | 0          | 0          | 0          | 41         | 75         | 75         | 80         | 71         | 71         | 71         | 71         | 71         | 71         | 71         | 71         | 71         | 1121        |
| <b>AMR 2019 Total</b>          | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b>   | <b>0</b>   | <b>0</b>   | <b>10</b>  | <b>100</b> | <b>250</b> | <b>250</b> | <b>235</b> | <b>245</b> | <b>245</b> | <b>245</b> | <b>255</b> | <b>255</b> | <b>255</b> | <b>255</b> | <b>270</b> | <b>1200</b> |

Table 4: Ipswich Garden Suburb – delivery comparison

- 5.1.24 Additionally, given the above information on national evidence of housing delivery rates and that Ipswich Borough has not delivered any large sites comparable to the scale proposed for the Ipswich Garden Suburb, it is clear that realistic assumptions on the delivery of Ipswich Garden Suburb have not been applied.

#### Conclusion on housing delivery

- 5.1.25 The implications of applying a more realistic delivery assumption at the Ipswich Garden Suburb, alongside the concerns over the deliverability and viability of numerous SP2 sites evidences that the Council's current and continued strategy for delivering homes is flawed.
- 5.1.26 Furthermore, through employing a stepped housing requirement, the Council is continuing to delay meeting the identified housing needs of the district and therefore conflicts with the advice detailed in the PPG.
- 5.1.27 Gladman assert that Ipswich Borough Council need to identify significantly more sites, which are realistically deliverable and viable to support the currently identified housing supply. It is evident that to ensure the Borough's housing need can be met that the sites, including realistically deliverable strategic sites, outside of the Borough's boundary, should be identified.

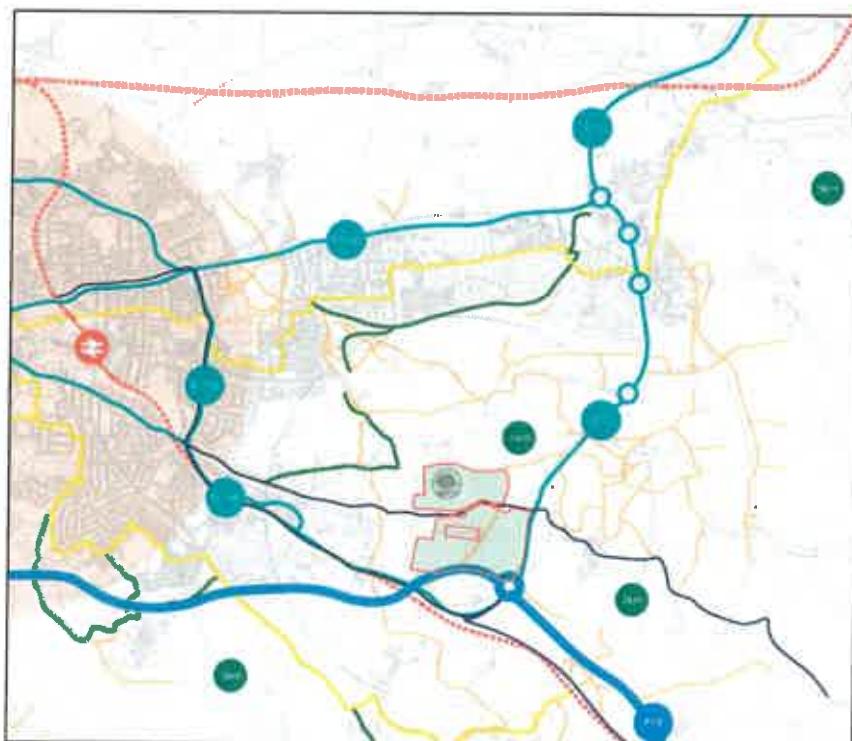
## 6 SITE SUBMISSIONS

### 6.1 Overview

6.1.1 Gladman has land interests within the neighbouring districts of East Suffolk and Babergh. Details of these sites are outlined below. The tightly bounded nature of Ipswich Borough means that greater consideration will need to be taken to development opportunities beyond administrative boundaries working under the duty to cooperate. This will be required to ensure that the development needs of the area can be met whilst maintaining a rolling five year housing land supply.

### 6.2 Orwell Green Garden Village

6.2.1 Gladman are promoting land to the east of Ipswich, within East Suffolk District, for the development of 'Orwell Green Garden Village'. The Orwell Green Garden Village is ideally located on the eastern outskirts of Ipswich, approximately 6.5km from the Town Centre. The land extends to approximately 142 hectares and is located to the north of the A14 and the west of the A12, which together act as a major transport corridor, linking the urban areas of Cambridge and Ipswich to the east coast.



*Orwell Green Site Location Plan*

- 6.2.2 The site is included within the Suffolk Coastal Strategic Housing and Economic Land Availability Assessment and Interim Sustainability Appraisal under Site Option Reference 485: Land North and South of Bucklesham Road, IP10 0AG. The SHELAA concludes that the site is potentially suitable for development, subject to a range of wider considerations associated with strategic scale development proposals. Gladman are of the view that in identifying an appropriate strategy for the future development of Ipswich and East Suffolk District, there is a strong case for the allocation of additional land for the development of a garden village to the East of Ipswich in order to meet the development needs of the area and support the wider economic growth ambitions of the region and the UK more widely.
- 6.2.3 Garden Villages are an effective way to deliver housing within an appropriate timeframe and with critical mass that will facilitate the delivery of infrastructure such as schools, health centres and transport improvements to the benefit of new and existing communities. Each project and location has its own specific context which means the Garden City principles are not a blueprint for designing new Garden Villages but are key characteristics that make Garden Villages successful.
- 6.2.4 The Orwell Green Garden Village site is well connected and provides a real opportunity to provide a well-planned, well located, well designed community that is supported by the necessary infrastructure and facilities and that meets all the objectives of the Government's Garden Communities Programme. The proposal also has the ability to provide a comprehensive approach to supporting the planning of the wider strategic planning area

Key details of the development proposal are highlighted below:

- A total site size of approximately 142ha
- Approximately 72ha of land for the development of a mix of house types, providing up to 2,700 new homes to suit the requirements of a wide range of households.
- It is anticipated that two new primary schools would be developed on the site and that express bus provision will be made available to access a nearby secondary school.
- Green Infrastructure: approximately 60ha
- An extensive range of new sport, recreation and play facilities
- The development of allotments, a village green and community orchards
- A well located and connected Village Centre at the heart of the development - designed to include space for a market square, community hall, school & crèche, sports & play facilities, a medical centre & pharmacy, a café, a supermarket, other smaller retail units, a village pub and infrastructure for public transport.

- 6.2.5 A Framework Plan, setting out the proposals for the site is provided at Appendix 1 to these representations.

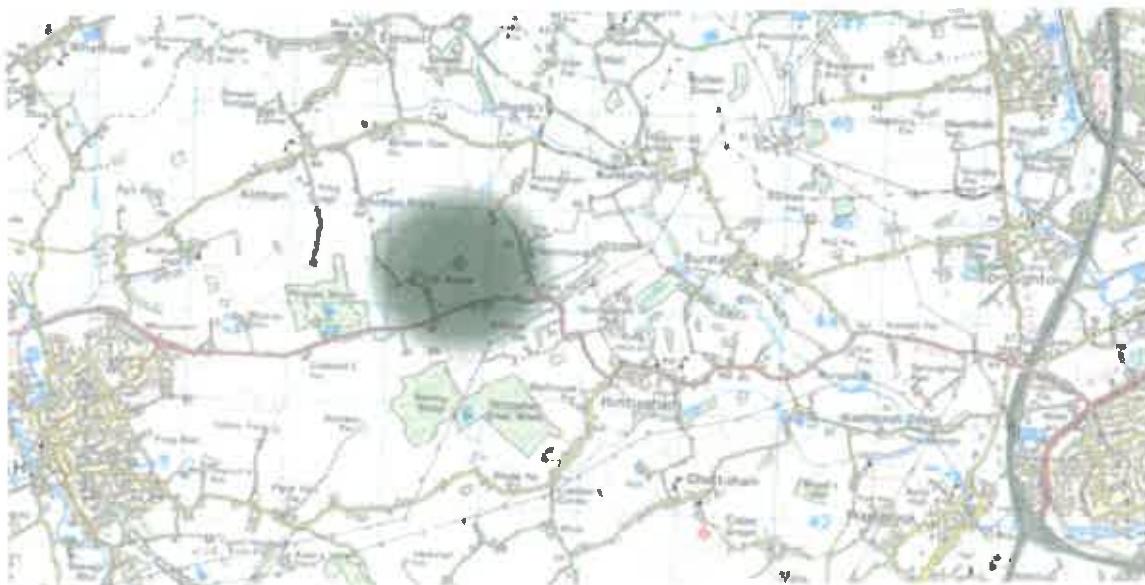
- 6.2.6 A sustainable and suitable access can be achieved from the A12 via a new roundabout. A roundabout in that location would be helpful in terms of aspirations to reduce speeds (from the current 70mph to 40/50mph) and allow for better distribution of traffic along that road.
- 6.2.7 The site is also well located in terms of public transport routes. It is in proximity to regular bus services which run throughout the day between Ipswich and Felixstowe (services 75/76 and 77), with the opportunity to promote and establish further sustainable modes of transportation through new and improved bus routes and services and by upgrading and maintaining public rights of way and new cycle ways.
- 6.2.8 The site does not fall within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty nor is it within an area of fluvial flood risk, which is a constraint to future development across much of the wider area. It has no physical constraints that would stop the site coming forward. Furthermore, the site can be brought forward in a manner that is sensitive to its wider landscape setting; creates strong and well-connected green infrastructure; and, that provides the opportunity to deliver significant long-term ecological benefits through the retention and enhancement of many existing features as well as the provision of new features that will encourage biodiversity.
- 6.2.9 In terms of sustainable energy, the new development can be designed to mitigate energy usage and loss with high levels of insulation, maximisation of natural light and optimum solar orientation. There are a number of renewable energy generation technologies that can be investigated to help supply the Garden Village with sustainable energy networks, including the installation of photovoltaic panels, local energy storage and sharing by way of batteries, solar thermal panels, ground and air source heat pumps, wind turbines or biomass boilers.
- 6.2.10 The development of a Garden Village in this location also provides a tremendous opportunity to improve the quality of areas where people live and work. As well as on site employment opportunities, there are a wide range of employment, retail and leisure opportunities in proximity to the site, including those at: Warren Heath Retail Park and the Euro Retail Park, Ransomes Industrial Estate, Springbank Industrial Estate, Three Rivers Business Centre and via its strong links to the centre of Ipswich.
- 6.2.11 The site benefits from having a single landowner who wishes to make the site available for development. This presents an ideal opportunity for development to be brought forward at the Garden Village in shorter timescales than are often observed in relation to strategic development proposals of this nature.
- 6.2.12 The site can be delivered on a phased basis. At this stage we would foresee that a master builder would deliver key infrastructure. It is envisaged that the master builder would play a pivotal role in the delivery of Orwell Green Garden Village, together with a coalition of key stakeholders, through an

effective governance structure that would be put in place from the outset of the project. A community management company with resident and stakeholder participation is envisaged, funded through an annual management charge and on-site funding sources. It is envisaged that the open space and community assets of the Garden Village would be transferred to a management trust or parish council that would be responsible for protecting them in perpetuity.

- 6.2.13 The Orwell Green Garden Village presents an ideal opportunity to establish an exemplar Garden Village through an effective partnership between the local planning authorities within the Ipswich Strategic Planning Area and local stakeholders. It provides huge potential to create a sustainable, distinctive and attractive residential led mixed use new settlement in a location where people will genuinely want to live.

### 6.3 A Garden Village for Babergh

- 6.3.1 Gladman are also promoting a potential location for growth, which has the ability to take the form of a new settlement located in Babergh District.
- 6.3.2 Gladman has identified a potential area of search for a new Garden Village in a strategic location in Babergh which lies between the settlements of Hadleigh and Ipswich. Gladman are working with the landowners and believe there is an opportunity to deliver a sustainable new settlement in this location which could help meet the housing needs of Babergh and Mid Suffolk, as well as the needs of the wider housing market area including Ipswich. A Location Plan which shows the broad area of search for the new settlement can be seen below:



*Babergh District Garden Village - Broad Location Plan*

- 6.3.3 The new Garden Village provides the opportunity to deliver the homes people need in well planned, attractive new communities of the highest quality. It has the potential to deliver a combination of new high-quality market and affordable homes, as well as specialised housing. We also envisage business and employment uses, community uses and extensive greenspace forming part of the proposals.
- 6.3.4 The Government has identified that new settlements have a key role to play, not only in meeting this country's housing needs in the short-term but also in providing a stable pipeline of housing well into the future.
- 6.3.5 Creating new communities can minimise the need to develop urban extensions, maintaining the character of existing settlements and reducing pressure on existing social infrastructure such as schools and health services. New settlements can be planned comprehensively, building on the Garden City concept to deliver new homes which will be served by new local infrastructure and will effectively become new communities in their own right.
- 6.3.6 Gladman have identified the following key characteristics which we believe provide a framework for Garden Villages:
- Creating a locally distinctive and attractive environment
  - Provision of a policy compliant level of affordable homes in a variety of different tenures
  - Use of high-quality materials and design
  - Well designed, multi-functional accessible greenspaces
  - Sustainable transport options
  - Enhancing the natural environment and biodiversity
  - Providing homes close to employment opportunities
  - Services for day to day needs

## 6.4 Why this location?

- The site is strategically located between Ipswich and Hadleigh on the transport corridor between Ipswich and Sudbury;
- The site has the ability to assist in addressing high levels of housing need and poor affordability;

- 
- **The site creates opportunities to enhance existing sustainable transport connections within the wider Suffolk area**
  - **The site is ideally located to support the economic growth ambitions of the New Anglia LEP and assist in addressing issues such as low productivity, skills and attainment levels and lower than average earnings**
  - **Two willing and committed landowners, in partnership with Gladman, are in a position to bring forward sufficient land for a garden village, ensuring the scheme is deliverable**

## 7 CONCLUSIONS

### 7.1 Assessment against the tests of soundness

- 7.1.1 For the emerging Ipswich Local Plan Review to be found sound at examination it must be able to meet the four tests of soundness as required by paragraph 35 of the Framework. This will require the Local Plan to be positively prepared, justified, effective and consistent with national planning policy.
- 7.1.2 Gladman submit that the Local Plan as currently proposed is unsound and fails to meet the tests of soundness outlined above. Gladman has significant concerns with regard to the Council's ability to meet its housing needs in full over the plan period and also the impact that this will have on the wider Ipswich Strategic Planning Area. This issue must be addressed through positive action and engagement under the Duty to Cooperate.
- 7.1.3 It is vital that the Plans that are put in place across the area can meet the minimum housing needs set using the standard method. In addition, careful consideration will need to be given to the need to plan for new infrastructure, the need to support economic growth ambitions and the need to deliver affordable housing to meet identified needs when setting the housing requirement. The Council has failed to address these issues which are relevant in the Ipswich Strategic Planning Area. Indeed, the proposals within the emerging Local Plan merely seek to roll forward an existing strategy which has failed to deliver the scale of homes needed to meet identified housing needs. It is clear that an alternative strategy is therefore required to support the delivery from the proposed components of supply, such as the Ipswich Garden Suburb and sites within the IP-One area. As previously highlighted in response to the Reg 18 Preferred Options consultation, the report undertaken by Planning Prospects on behalf of Gladman provides reasoned justification for reaching the conclusion that current delivery assumptions from within Ipswich Borough are not realistic and must be supplemented by additional housing sites beyond the administrative boundary in order that an effective plan can be put in place that meet the housing needs of the HMA as a whole.
- 7.1.4 The Orwell Green Garden Village and Babergh Garden Village proposals provide significant opportunities to address these issues as well as ensuring the delivery of affordable housing, supporting economic growth and improvements to the area's infrastructure ambitions. The sites are well related to Ipswich and can therefore be brought forward to make a sizeable contribution to the housing needs of the Borough and the HMA as a whole during the plan period.
- 7.1.5 Given the significant issues raised, Gladman request to participate at the hearing session(s) at the Examination In Public.



0 100 200 300 400 500m

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Application Boundary (141.85 ha)

Proposed Infrastructure

New Roundabout Access off A12

Main Avenue

**Development - 57% of overall Area (81.04ha)**

Residential (72.48 ha)  
(2,700 dwellings @ 38 dph including 100no. apartments within the Neighbourhood Centre)

Neighbourhood Centre (2.30ha)

Up to 100 Apartments  
Single Large Retail Unit (800sqm)  
3 Bistro/Kiosk Units/Terrace (500sqm)  
Doctors Surgery (900sqm)  
Community Building/Pavilion (400sqm)  
B1 Office (400sqm)

Primary School (0.05ha)

Primary School 1 - 2 Form Entry & Expansion (2.0ha)

Primary School 2 - 2 Form Entry & Expansion (2.0ha)

Extra Care Apartments (0.9ha)

Pub/Restaurant (0.26ha)

**Green Infrastructure - 43% of overall Area (60.84ha)**

BANG (48.89 ha)

Sports Pitch & Changing (5.54ha)

Village Green with Cricket Pitch and Community Croftard (1.66ha)

Allotments (1.00ha)

Indicative Play Areas (0.12ha)

Indicative Detention Basins (2.6ha)

Existing Public Right of Way

Circular Walk

Retained Trees and Hedgerow

Proposed Trees and Hedgerow

Acoustic Bund and Fence

**Felicia Blake**

---

**From:** Henry Brown  
**Sent:** 02 March 2020 15:25  
**To:** PlanningPolicy  
**Cc:** Ursula Rafferty; Chris Pattison  
**Subject:** Ipswich Local Plan Review Final Draft Consultation  
**Attachments:** 02.03.20 Ipswich Local Plan Final Draft Representation.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/ Madam

On behalf of our client, Grainger plc, please find attached our representation to the consultation on the final draft Ipswich Local Plan. I would be grateful if you could acknowledge receipt of this email.

Kind regards

**Henry Brown**

**Turnberry**

41-43 Maddox Street  
London  
W1S 2PD

Web: [www.turnberryltd.com](http://www.turnberryltd.com)

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Ipswich Borough Council,  
Planning Policy,  
3W Grafton House,  
15-17 Russell Road,  
Ipswich,  
IP1 2DE

# Turnberry

Our ref: GP-KES

Your ref:

2<sup>nd</sup> March 2020

Dear Sir/Madam,

## Ipswich Local Plan Review Final Draft- Consultation Response

This representation has been prepared by Turnberry on behalf of our client, Grainger plc, who has interests in the strategic area East of Ipswich. This submission should be interpreted as an **OBJECTION** to the Ipswich Local Plan Review Final Draft consultation documents on the basis that it is not legally compliant and unsound for reasons that will be detailed in this representation and summarised below:

1. The Plan is Ineffective as it does not allocate an adequate number of deliverable sites over the plan period to maintain the housing need of the Borough as a consequence of the 20% buffer now required under the Housing Delivery Test;
2. There is a lack of evidence to support the proposed windfall rate which may mean unmet need will increase over the plan period;
3. By virtue of lack of available sites, the draft Plan falls in its Duty to Cooperate with neighbouring planning authorities to identify additional sites resulting in the Plan not being justified or positively prepared as well as being contrary to the legal requirements of the Localism Act 2011.

The 8,010 figure for housing need over the plan period does not include the 20% buffer required due to Ipswich Borough Council failing the Housing Delivery Test. This buffer will need to be provided in addition to the 8,010, 20% of which would equal an extra 1,620 dwellings. This equates

to a total of 9,630 dwellings required over the plan period. Of this figure of 8,010 there are 1,910 dwellings which are either completed, under construction, have planning permission, or have resolution to grant permission, leaving a figure of 6,100 dwellings to be allocated through the Local Plan to meet the full requirement. In policy CS7, the total Housing Land Supply is stated to be 7,214 dwellings. Although this figure is in excess of the 6,100 needed using the standard method, it does not cover the entirety of the additional 1,620 homes needed to account for the 20% buffer. The supply outlined in policy CS7 accounts for only 1,114 of the 1,620 dwellings needed for the 20% buffer. Therefore, Ipswich Borough Council cannot demonstrate a housing land supply that meets the housing need with the 20% buffer required by government. This means that Ipswich must look to its neighbours within the Ipswich Strategic Planning Area to account for this deficit of 506 dwellings required over the plan period.

Moreover, Ipswich Borough Council may be over-estimating their windfall sites at 700 homes for the period 2022-2036 which equates to 50dpa (dwellings per annum). There is insufficient evidence to support this given the recent decline in windfall rates.

Historic rates of windfall delivery have been drastically declining in that past few years (see summary table below), particularly in relation to windfall through permitted development. We argue that this trend will continue as the majority of dilapidated offices have now taken full advantage of the change in permitted development rights to allow their conversion to residential without the need for full planning permission. Therefore, overall windfall rates will continue to decrease and level out at a lower rate likely to be lower than the 50dpa suggested in policy CS7 in the draft Plan.

|           | Windfall rate | Windfall permitted development rate | Net Windfall |
|-----------|---------------|-------------------------------------|--------------|
| 2015-2016 | 230           | 145                                 | 85           |
| 2016-2017 | 175           | 86                                  | 89           |
| 2017-2018 | 43            | 17                                  | 26           |

*Overall windfall rates and windfall permitted development rates from 2015-2018*

Therefore, the scale of unmet need could increase over the plan period, unless more evidence is brought forward to justify the windfall rate.

In identifying sites outwith its boundaries, the Council should be prioritising development as close as possible to the Borough's boundaries and in sustainable locations with good transport links, such as arterial roads with bus routes available.

In particular, employment is projected to increase within the East of Ipswich planning area, especially within Suffolk Coastal District Council which has seen a 13.4% increase in employment from 2001-2016 owing to Felixstowe and Martlesham employment area being centres for employment east of Ipswich. Business and professional services has a forecasted growth of 12,400 jobs (+31%), with the majority of associated demand for office space focused within Ipswich town centre and at Martlesham Heath/Adastral Park. Therefore, unmet housing need in Ipswich should be sustainably located close to the source of that need and where employment opportunities are greatest. This is supported by Paragraph 103 of the NPPF which states:

*"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."*

The Council should therefore bring forward a process under the Duty to Cooperate to identify sites in neighbouring Boroughs to resolve its unmet need, and should do so in accordance with the terms of the NPPF i.e. unmet need being sustainably located closest to the point of need, along arterial routes with good bus links and in the East of Ipswich area, close to the largest employment centres of Ipswich, Martlesham and Felixstowe.

I trust these representations will be helpful to the Council in framing its next steps.

Yours faithfully,

Chris Pattison  
Turnberry

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

H



## Felicia Blake

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**From:** Mamun Madaser  
**Sent:** 27 February 2020 14:07  
**To:** PlanningPolicy  
**Subject:** Local Plan Ipswich consultation response  
**Attachments:** Ipswich Local Plan Consultation Response DRAFT.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi there,  
Please find Habinteg's response to Ipswich's recent Local Plan consultation.  
If you could please confirm receipt of the document that would be very helpful.  
Kind regards,  
Mamun  
**Mamun Madaser**  
Parliamentary & Research Officer



T 020 7822 8706 | [habinteg.org.uk](http://habinteg.org.uk)  
Holyer House, 20-21 Red Lion Court,  
London, EC4A 3EB



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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> |                                                                                                                                                                                                                                                                |
| <b>Please return this comments form to:</b>                          | <p><u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or</p> <p><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b></p> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                                |
| <b>This form has two parts:</b>                                      | <p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>                                                                                                                                                                                |

#### PART A PERSONAL DETAILS

|                                               | <b>1. Personal details</b>                                 | <b>2. Agent's details (if applicable)</b> |
|-----------------------------------------------|------------------------------------------------------------|-------------------------------------------|
| <b>Title</b>                                  | Mr                                                         |                                           |
| <b>First name</b>                             | Mamun                                                      |                                           |
| <b>Last name</b>                              | Madaser                                                    |                                           |
| <b>Job title (where relevant)</b>             | Parliamentary & Research Officer                           |                                           |
| <b>Organisation (where relevant)</b>          | Habinteg Housing Association                               |                                           |
| <b>Address<br/>(Please include post code)</b> | Holyer House<br>20-21 Red Lion Court<br>London<br>EC4A 3EB |                                           |
| <b>E-mail</b>                                 |                                                            |                                           |
| <b>Telephone No.</b>                          | <b>0207 822 8706</b>                                       |                                           |

## PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

|                                                             |  |
|-------------------------------------------------------------|--|
| Your name or organisation (and client if you are an agent): |  |
|-------------------------------------------------------------|--|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.                                     | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ipswich Local Plan Final Draft – Policy DM12: Design and Character | <p>Habinteg has 50 years' experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response therefore focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of Ipswich.</p> <p>Habinteg strongly supports the approach to Part M4(2) accessible and adaptable homes. It's great to see Policy DM12 ask for "25% of new dwellings will be required to be built to Building Regulations Standard M4(2)." The policy ask is significant in helping to ensure that a proportion of new homes will be accessible.</p> <p>According to the English housing survey only 7% of English homes have the accessibility features to classify them as 'visitable'. Habinteg believe that all new homes should be built to Part M4(2) accessible and adaptable to help meet the national accessible homes deficit. A Habinteg research report (A forecast for accessible homes) published in the summer of 2019 revealed that in England only 22% of new homes due to be built by 2030 will meet accessible and adaptable standards. With this in mind we warmly welcome the prospect of Ipswich Borough Council setting out the requirement for a proportion of homes to have the capability to adapt as residents' need change.</p> <p>The policy goes on to say that "The Council will consider waiving or reducing the requirement where the circumstances of the proposal, site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable." We believe the language should be firmer, so that there is a narrower definition given for when the standard may not be applied. A definition which firmly places the burden of proof onto the developer which will help minimise instances where compliance with the policy is argued out during the planning permission process.</p> <p>This emphasises for us that alongside an increased supply of accessible and adaptable homes it is critical that an adequate number of homes are built to Category M4(3) wheelchair user dwelling standard. Habinteg's <i>Forecast for Accessible Homes</i> also found that just 1% of homes outside London are set to be</p> |

| <b>Document(s) and document part.</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                       | <p><b>built to wheelchair dwelling standards between 2019 and 2030.</b></p> <p>We would therefore like to see Ipswich set a similar requirement for wheelchair user dwellings as that set down in the London Plan which requires that, 10% of new homes comply with Part M4 (3) Standard (the other 90% required to be built to part M4 (2) accessible and adaptable standard). Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of Part M4(3) homes should be considered as a starting point for all local plans.</p> <p>Habinteg's in house consultancy Centre for Accessible Environments, (CAE) offer bespoke training and consultancy on all aspects of access including housing, public spaces and community facilities. CAE's services may be of benefit to the Central Lancashire planning department in ensuring housing is delivered to the required M4(2) / M4(3) standards. The team have delivered support to several local authorities as well as statutory bodies such as Homes England, helping to upskill staff in the specific characteristics of accessible housing, as well as providing practical support reviewing development plans and proposals. You can read more on the CAE website at <a href="http://www.CAE.org.uk">www.CAE.org.uk</a></p> <p>Please don't hesitate to get in touch with us if we can help in any way with development of the Central Lancashire plan. <a href="mailto:cmcgill@habinteg.org.uk">cmcgill@habinteg.org.uk</a></p> |
|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

| <b>Document(s) and document part.</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|                                       |                                                                                                                     |

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |

**Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.**

### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**  Yes

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**  Yes

**Adoption of the Ipswich Local Plan Review.**  Yes

### **PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Felicia Blake**

---

**From:** Paul Harvey  
**Sent:** 26 January 2020 13:31  
**To:** PlanningPolicy  
**Subject:** Co-op redevelopment Prince of Wales drive

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I am sending this e-mail, concerning the impact of new houses and flats on the old co-op site. My main issue is the parking with not enough spaces for the residents and friends, this will over flow to near by roads like Chatsworth, coupled with the school run would cause a accident just waiting to happen. I feel co-op have dragged there feet for so long knowing after so many years they can apply for a domestic application instead of what it was intended for. Thank you for listening.

**Felicia Blake**

---

**From:** Cooper, Eric  
**Sent:** 03 March 2020 07:47  
**To:** PlanningPolicy  
**Subject:** RE: Ipswich Local Plan Draft Final Public Consultation  
**Attachments:** Highways England Ipswich Local Plan Response.pdf

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs

Unfortunately, the wrong attachment was sent with Highways England's response to the Local Plan consultation.

The correct version is now attached. I apologise for any inconvenience this causes.

Regards

Eric

**Eric Cooper, Spatial Planning Manager**  
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

Web: [www.highwaysengland.co.uk](http://www.highwaysengland.co.uk)

---

**From:** Cooper, Eric  
**Sent:** 02 March 2020 23:45  
**To:** 'PlanningPolicy@ipswich.gov.uk' <PlanningPolicy@ipswich.gov.uk>  
**Subject:** ipswich Local Plan Draft Final Public Consultation

Dear Sirs

Please find attached Highways England's response to the above consultation

Regards

**Eric Cooper, Spatial Planning Manager**  
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

Web: [www.highwaysengland.co.uk](http://www.highwaysengland.co.uk)

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Planning Policy  
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Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich Suffolk  
IP1 2DE

Eric Cooper  
Operations - East  
Woodlands  
Manton Lane  
Bedford MK41 7LW

2 March 2020

Dear Sirs

### **Consultation on Ipswich Local Plan Review Final Draft**

Thank you for inviting Highways England to comment on the Final Draft Review of the Ipswich Borough Council Local Plan.

Highways England is responsible for the operation, maintenance and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding Ipswich, this relates to the A14 and A12 trunk roads. Consequently, our comments on the draft Local Plan are limited to those aspects which relate to these roads.

In general, Highways England considers that Ipswich Borough Council's consideration of land use policy, the transport evidence to support it and the consequential understanding on the impact of the strategic road network is generally sound and consistent with government policy.

Through the process of the development of this local plan and those covered by adjacent planning authorities which fall within the Ipswich Strategic Planning Area (ISPA), Highways England has worked closely with Suffolk County Council on the development of the evidence base to support the plan. Specifically, this relates to the modelling work which is reported in some detail in the WSP Technical Note - RIS Scheme SRN Impacts dated July 2019.

Whilst the majority of the proposed development growth within Ipswich lies remotely from the SRN, the modelling work shows that accumulatively growth in the Ipswich Strategic Planning Area is predicted to collectively add to significant strain on the transport network in and around Ipswich. Additional highway capacity will not on its own address these issues and it is noted that the local authorities across the ISPA agree that robust steps must be taken to prioritise healthy and sustainable travel. Highways England supports this position.

The draft Local Plan identifies a package of transport mitigation measures to reduce vehicle movements and Suffolk County Council as the Highway Authority has developed

a strategy which contains a package of mitigation measures to deliver modal shift and mitigate impacts on the wider Ipswich highways network.

These include:

- Transport infrastructure to encourage and support sustainable modes of transport
- A Bus Quality Partnership
- A Smarter Choices programme
- Review of car parking and pricing strategies
- Review of park and ride strategy
- Junction improvements

Highways England supports this strategy.

### **Policy ISPA2 Strategic Infrastructure Priorities**

#### **Major Infrastructure**

Within the major infrastructure proposal list a number of A14 improvements required to support the proposed growth have been identified. This is consistent with the findings of the modelling and study work undertaken. The Plan notes that longer term funding would comprise a mixture of growth funds, developer funding together with monies identified from a future Roads Investment Strategy (RIS). RIS2 which covers the period 2020-2025 has not yet been published so it is not possible to confirm that this would be the case, or whether any funding would be available from a future RIS.

Consequently, Highways England consider without the robust measures identified by Suffolk County Council and referred to above, it is not certain that the delivery of the latter stages of the plan can be achieved. Consequently, it is vital that a robust manage and monitor approach is maintained through out the life of the plan.

#### **Ipswich Northern Route (Bypass)**

Whilst not part of this Plan, It proposes a longer term aspiration for an Ipswich Northern Bypass which would lie within the East Suffolk Council and Mid Suffolk District Council area. The scheme would improve connectivity between the A14 and A12, reduce pressure on the A14 and improve network resilience, especially to the sections of A14 in the vicinity of the Orwell Bridge and Junction 55 (Copdock). Highways England has no objection in principle however it is noted however that Suffolk County Council on 25 February 2020 at a cabinet meeting resolved not to take this scheme forward.

#### **Ipswich Port**

The Plan aspires for a longer proposal for an east bank link road and a new A14(T) junction could work which would provide increased accessibility and reduce congestion to this area of Ipswich. As stated Highways England are not in favour of the proposals as there is concern with resultant local 'junction hopping' along the A14 which would reduce highway capacity, and more significantly it is considered that there is insufficient geometric capacity to accommodate an additional junctions on this section of the A14.



## **Policy CS20: Key Transport Proposals**

The evidence base provides some indicative proposals for upgrading of a number of junctions along the A14 and potentially cost-effective measures for resolving identified link and junction capacity problems arising from growth. The menu of potential measures includes proposals to re-establishing the Bury Road Park and Ride and the provision of a new site in Nacton Road.

Highways England considers that subject to further work these are potentially feasible options and if the aspirations for modal shift amongst the new and existing communities set out in the Plan are achieved, then it is likely that they will reduce impacts on the network below what was originally modelled.

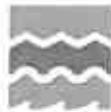
However, it is acknowledged that those measures will not address the underlining capacity issues of the A14 corridor and further measures may be required such as variable mandatory speed limits on the A14 offer a means of managing increasing demand on the links more safely, and substantial improvements at Junction 55 (Copdock)

Funding of such measures is clearly an issue and as noted above, at this stage there is no certainty of the availability of future Highways England capital funding programme funding given that RIS2 has yet to be published.

Highways England looks forward to ongoing engagement with the local plan authority and Suffolk County Council on developing the measures identified in the plan which will support enhanced capacity to the public and private transport network.

Yours faithfully

Eric Cooper  
Spatial Planning Manager



Ms Felicia Blake  
Ipswich Borough Council  
Grafton House  
15 - 17 Russell Road  
Ipswich  
Suffolk  
IP1 2DE

Our ref: PL00121006

2 March 2020

Dear Ms Blake

**Ref: Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review - final draft, and Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review - Final Draft (January 2020)**

Thank you for consulting Historic England on the Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review - final draft, and Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review - Final Draft (January 2020). As a statutory consultee, our role is to ensure that the conservation of the historic environment is fully integrated into planning policy and that any policy documents make provision for a positive strategy for the preservation and enjoyment of the historic environment.

Our comments below should be read with reference to our previous response dated 13<sup>th</sup> March 2019.

## SUMMARY

Under paragraph 35 of the National Planning Policy Framework ('The Framework') we consider that this Plan is unsound as some aspects are not effective, or consistent with national policy. We have identified in detail below where we find the Plan unsound and what measures are needed to make the Plan sound. In particular we have recommended the inclusion of specific policy references for heritage assets and identified mitigation within Policies SP2 (Land Allocated for Housing), SP4 (Opportunity Sites), SP5 (Land Allocated for Employment Use), SP11 (The Waterfront), SP12 (Education Quarter), and SP13 (Portman Quarter).

## DETAILED COMMENTS

### Policy CS2: The Location and Nature of Development

Policy CS2: The Location and Nature of Development outlines how the sustainable



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)





growth and regeneration of Ipswich will be achieved. This includes focussing new residential development and community facilities into the town centre, the Waterfront, Portman Quarter, and Ipswich Garden Suburb and into or within walking distance of the town's district centres, and supporting community development, which we support. We note the reference to higher density homes, which is understandable in an urban setting, but are concerned that the term is treated as a synonym for tall buildings / flats. This appears to be confirmed in the final paragraph of Policy CS2 which states: *"In the interests of maximising the use of previously developed land, development densities will be high in the town centre, Portman Quarter and Waterfront, medium in the rest of IP-One and in and around the district centres, and low elsewhere, provided that in all areas it does not compromise heritage assets and the historic character of Ipswich."*

The inference here is that 'high density' could 'comprise' the historic character of Ipswich, presumably by way of tall buildings affecting the setting of these assets, impacting on their significance.

While we welcome the aspiration that densities should not compromise heritage assets and the historic character of Ipswich, we consider that this section on densities needs to be clarified, and 'high', 'medium' and 'low' densities defined. The policy should also make it clear that good design should not only respect the historic character of an area, but respond to it. High density does not need to take the form of flats, and we would refer you to our 'Increasing Residential Density publication from 2018:

<https://historicengland.org.uk/images-books/publications/increasing-residential-density-in-historic-environments/>

Indeed the presence of heritage assets does not automatically preclude high density development, and high density development is often compatible with the character of an historic place and can provide an opportunity to reconnect a fractured, fragmented or damaged historic townscape. CS2 as currently drafted could preclude such development.

**Policy CS3: IP-One Area Action Plan;**  
**SP2: Land Allocated for Housing;**  
**SP4: Opportunity Sites;**  
**SP5: Land Allocated for Employment Use;**  
**Policy SP11: The Waterfront;**  
**Policy SP12: Education Quarter; and**  
**Policy SP13: Portman Quarter**

We are extremely concerned about the lack of clarity regarding the status of the IP-One Area Action Plan, the lack of clear delineation of the opportunity areas, and the absence of robust policies for these which in our view renders this aspect of the Plan

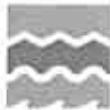


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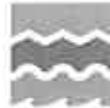


not effective, and therefore unsound. The IP-One Area covers the historic core of Ipswich, and contains the highest concentration of the town's designated heritage assets. Ipswich is particularly special in that it has origins as one of only four international ports in the Middle Saxon period. As a major Anglo-Saxon centre engaged in long-distance trade, it has an internationally important archaeological record from this time. The town's early fortunes were linked to the developing Anglo-Saxon kingdom of East Anglia, and *Gipeswic* was a likely trading settlement founded by the Royal House, notably associated with the burial ground at Sutton Hoo. The area also includes a number of notable listed buildings, as well as parts of several Conservation Areas. The appropriate management of the historic environment will therefore be a significant consideration in the design and deliverability of new development within the IP-One area, and it is therefore critical that the Plan provides a clear framework against which future development proposals can be assessed to ensure that these important assets are conserved and enhanced in line with the requirements of the NPPF.

## Status of the IP-One Area Action Plan

Policy CS3: IP-One Area Action Plan discusses the IP-One Area Action Plan, and advises that the Council will "prepare and implement an IP-One Area Action Plan" and goes on to state that the Area Action Plan will include policies, which amongst other things will "define the extent of the Waterfront and the Portman Quarter", "allocate sites for development", "set down development principles", and identify heritage assets which development should have regard to" etc. The way this section is currently drafted suggests that this work has yet to be completed, and that in due course a new Area Action Plan will be prepared, clarifying the opportunity area boundaries, and setting out detailed policy criteria against which development proposals will be tested. However, following conversation with the Council we now understand this not to be the case, and in fact that the IP-One Area Action Plan has already been finalised and incorporated into the current Site Allocations and Policies DPD review (January 2020). We therefore find Policy CS3 highly confusing and misleading. Our main concern is that the Plan should be readable and useable. This document is likely to be read by developers, home owners and other planning professionals, and in places (most notably those sections discussing the IP-One Area) it is extremely difficult to follow. If it is the case that the IP-One Area Action Plan has been completed and is incorporated into the Regulation 19 Plan, then Policy CS3 and supporting text need to clearly state this. Notwithstanding this, it is our contention that the Council has not followed CS3 in that it has not clearly defined the extent of the opportunity areas (Policy CS3, criteria a), has not set down the development principles which will be applied to new development (Policy CS3, criteria c), and has not identified the heritage assets which development proposals will need to have regard to and integrate new development with the existing townscape (Policy CS3, criteria e). These issues are discussed in detail below.





## Delineation of Opportunity Areas

With regards the delineation of the opportunity areas, it is unclear which boundaries the Council is promoting through this Plan, and which areas are covered by Policies SP11, SP12, and SP13. The Policies Map IP-One Area inset and Chapter 6 of the Plan shows detailed boundaries for eight opportunity areas, namely:

- Opportunity Area A - Island site;
- Opportunity Area B - Merchants Quarter;
- Opportunity Area C - Mint Quarter and surrounding area;
- Opportunity Area D - Education Quarter and surrounding area;
- Opportunity Area E - Westgate;
- Opportunity Area F - River and Princess Street Corridor;
- Opportunity Area G - Upper Orwell and Canal side; and
- Opportunity Area H - Holywells

However, these areas do not appear to match up with the illustrative boundaries given in Diagram 3: The Ipswich Key Diagram, or the names for these areas given in Policies SP11 (The Waterfront), SP12 (Education Quarter), and Policy SP13 (Portman Quarter). This is important because as drafted it is unclear whether for example, SP11 (The Waterfront) comprise and covers the full extent of Opportunity Area A - Island Site, and Opportunity Area B - Merchants Quarter as illustrated in Chapter 6 etc. For the Plan to be effective the opportunity areas need to be clearly defined and labelled on the policies map, so that it is clear which policy and supporting text relates to which area, and the extent of the land in question.

## Policy coverage and a lack of robust wording to guide development

We consider that there needs to be greater clarity within the Plan regarding the status of the IP-One opportunity areas. Chapter 6 of the Site Allocation document provides further information on the opportunity areas, setting out development principles for each area, which we welcome. However, these principles are not set out in policies SP11, SP12, and SP13, and it would appear that the other opportunity areas in this section of the Plan (see our comments regarding the mismatch of opportunity areas above) don't have policies at all. Nor are they set out in Policies SP2: Land Allocated for Housing, SP4: Opportunity Sites, or SP5: Land Allocated for Employment Use. It is therefore unclear what status these development principles have in the context of decision-making. This issue is further confounded when the Local Plan allocations are factored in. Paragraph 6.1 of the Plan makes it clear that the individual allocation policies take precedence over the Opportunity Area guidance and site sheets for an individual area. This does not give a consistent vision for each area with clarity for a developer on what development to bring forward or the ability for the Council to set out what development will meet the aspirations for the area. This is particularly critical for non-allocated sites, where there is an inherent risk that speculative applications may





come forward with no overarching framework to guide development.

We understand that the Council considers that the Plan should be read as a whole and on this basis they consider that it is not necessary to include these criteria within policies SP2, SP4, SP5, SP11, SP12, and SP13. Whilst we appreciate that the Plan should be read as a whole, awareness of the relevance of the historic environment is often limited and could be missed, and so it should be made clear to the decision maker how they should react and which other Local Plan policies, SPDs and guidance apply as per NPPF paragraph 16d and 20d. Ideally this is best achieved through one policy for each opportunity area which specifically sets out the main criteria and parameters for that land. Robust site specific policies will help to articulate the vision for each opportunity area, setting out the means to improve connectivity, legibility, and ones experience of historic places, and help to ensure the key design and heritage principles are employed consistently and to a high quality. It would also help the Council to meet Paragraph 185 of the NPPF which requires Local Plans to set out a positive strategy for the historic environment.

We request that you review the wording for these policies again; identifying which heritage assets (or their settings) would be affected by the proposed development. Where a potential impact is identified, wording should be included in the policy and supporting text to this effect. This wording should incorporate the design principles set out in Chapter 6 of the Plan, and should include/draw on/reference, where relevant the Archaeological Character Zone by Archaeological Character Zone recommendations set out in Appendix 3 of the Council's Development & Archaeology supplementary planning document (SPD) (November 2018), as well as the Council's Urban Character SPD. This will make it clear to developers how they are expected to respond to the varied and often complex heritage issues which have been identified, and ensure a unified design response to avoid any sense of piecemeal and un-co-ordinated development. It may also be beneficial to elevate the Development Options plans (i.e. those illustrating the development options and design guidelines) from chapter 6 into the policies to ensure that they are given adequate weight in the decision-making process. Without this information the policies as drafted are not effective and therefore unsound.

## Other allocations sites with heritage issues

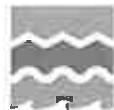
We draw your attention to the land allocated for future housing growth & associated infrastructure improvements known as ISPA4.1. This site includes the Grade II Listed Everton School Westerfield House in the north-western portion of the site, and is adjacent to/within the wider setting of other Grade II Listed buildings, notably Allens House, and Laceys Farmhouse which lie just outside the allocation boundary to the east. Development will need to preserve and where possible enhance these assets and their settings where this setting contributes to their significance. Given the proximity of these assets we would expect to see a Heritage Impact Assessment



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prepared to inform the redevelopment of this area. This document will need to assess the contribution which this land makes to those elements which contribute towards the significance of the heritage assets (designated and non-designated), and determine what impact its development might have upon their significance. Any specific measures required to remove or mitigate any harm to these assets should then be included in a site specific policy for ISPA4.1.

#### **Policy CS4: Protecting our Assets**

We welcome the changes to criterion 3 regarding the Council's commitment to a local list in policy.

#### **Policy DM15: Tall Buildings**

We welcome the changes to Policy DM15, but request that criterion 'i' is amended to read:

*Preserves strategic and local views, with particular reference to the settings of conservation areas, listed buildings, scheduled monuments, and other heritage assets, and the wooded skyline visible from and towards central Ipswich.*

We remain concerned that the tall building arc identified on the IP-One Policies Map still includes a significant area within the setting of the Grade I Listed Willis Building. Designed by Norman Foster in 1970-71 as a headquarters for global insurance broker Willis, Faber and Dumas (known as Willis in 2012), it is exceptional as the first large, multi-level building by one of Britain's most significant modern architects hailed internationally shortly after completion and recognised by architectural awards. One of its most striking features is its curvilinear glass curtain walling that reflects the surrounding buildings. Any new tall building therefore has the potential to impact on the setting, and therefore significance of this important building, and on this basis we advise pulling back the arc boundary in the immediate vicinity to avoid these potential impacts. Our Tall buildings advice note provides more information on taking an informed approach to tall building policy writing, using understanding of local character, distinctiveness and the significance of heritage assets, as well as pertinent issues. You can access it by following the link below:

<https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>

#### **Policy DM13: Built Heritage and Conservation**

We note the changes to this policy following our Regulation 18 advice.



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## Policy DM14: Archaeology

We welcome the changes to this policy following our Regulation 18 advice.

### Conclusion

Please note that absence of a comment on a policy, allocation or document in this letter does not mean that Historic England is content that the policy, allocation or document is devoid of historic environment issues.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Yours sincerely,

Andrew Marsh  
Historic Environment Planning Adviser, Planning Group



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749  
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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

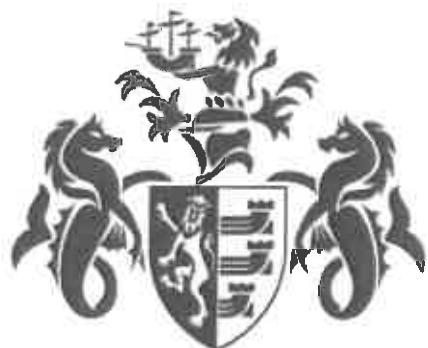
**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>Core Strategy and Policies Development Plan Document Review – Final Draft</b>                                                                                                                                                                    |
| <b>Please return this comments form to:</b>                          | <b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b><br><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                     |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><b>Part B – Your comment(s).</b>                                                                                                                                                                                |

| <b>PART A PERSONAL DETAILS</b>                |                            |                                           |
|-----------------------------------------------|----------------------------|-------------------------------------------|
|                                               | <b>1. Personal details</b> | <b>2. Agent's details (if applicable)</b> |
| <b>Title</b>                                  | Mr                         |                                           |
| <b>First name</b>                             | Oliver                     |                                           |
| <b>Last name</b>                              | Holmes                     |                                           |
| <b>Job title (<i>where relevant</i>)</b>      | -                          |                                           |
| <b>Organisation (<i>where relevant</i>)</b>   | Ipswich Liberal Democrats  |                                           |
| <b>Address<br/>(Please include post code)</b> |                            |                                           |
| <b>E-mail</b>                                 |                            |                                           |
| <b>Telephone No.</b>                          |                            |                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                                          |
|----------------------------------------------------------------------|------------------------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Oliver Holmes, Ipswich Liberal Democrats |
|----------------------------------------------------------------------|------------------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CS6.7 The Vision               | <b>To be sound, reference needs to be made to the Government's net zero 2050 policy together with reference to IBC's Climate Emergency Declaration July 2019. This needs to be an overarching policy vision over the whole of the Core Strategy. Failure to do so could make the CS unlawful.</b>                                                                                                                                                                                                                                         |
| CS6.8.4 and 5                  | <b>Development in itself is unlikely to achieve any reduction in carbon emissions (unless it is a form of carbon sink, for example). The Objective should be re-written so that permitted development will not add to carbon emissions.</b><br><br><b>To be sound, reference also needs to be made to air quality/pollution and the need for development not to add further to poor air quality in existing and potentially new Air Quality Management Areas.</b>                                                                         |
| CS6.8.6                        | <b>Throughout the Draft, reference is made to significant modal shift to achieve sustainability. However, although this policy has been in existence for some years, no evidence is given as to any modal shift having taken place. As modal shift is not occurring under existing policy (almost certainly as a result of both lack of initiatives and disincentives), continued reference to such shift could be seen as disingenuous. The Objective needs to be re-written to provide initiatives and disincentives to developers.</b> |
| CS6.17                         | <b>Any development in Humber Doucy Lane must not take place until the Garden Suburb is substantially completed. "Appropriately phased" is too open-ended. To be sound, and to enable completion of the Garden Suburb, no development should occur before a trigger point of 3,200 completed homes.</b>                                                                                                                                                                                                                                    |

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

| Document(s) and document part | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                     |
|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| CS8.18                        | <b>Although improved infrastructure is stated to be essential for sustainable growth, there are no viable transport solutions offered. Such schemes are unlikely to be achievable as planning gain through development. The Draft is therefore unsound and needs to be re-written to include sustainable options.</b>            |
| Policy CS1.                   | <b>This policy needs to be re-written to be compliant with UK Government policy on climate change. Net zero by 2050 is an objective above the NPPF. All development in Ipswich must be at or close to net zero by 2036 otherwise the 2050 target cannot be achieved.</b>                                                         |
| Policy CS5                    | <b>Although improving accessibility is recognised, it has to be borne in mind that the vast majority of journeys into and through Ipswich are by car and there is no objective for limiting or reducing car transport. It is entirely likely that accessibility will decrease over the plan period. (*see additional sheets)</b> |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**  yes

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**  yes

**Adoption of the Ipswich Local Plan Review.**  yes

### PRIVACY NOTICE

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the

creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

## Continuation Sheet 1 - Oliver Holmes

**Policy CS8.137:** Given the percentage of affordable housing in existing permissions of 5% and 4% for nearly 2000 houses, a target of 31% for the whole site of 3500 dwellings is not achievable. A more realistic percentage needs to be given.

**Policy CS16 (and DM 5):** A problem exists within Ipswich over sports grounds which can be illustrated by the grant of planning permission for residential development at Ipswich Sports Club in Henley Road. The hockey pitch was deemed inadequate and has been relocated elsewhere enabling potential development to take place. Although there could be shown at that particular time that the pitch was not needed, this facility was lost to this area of the town in perpetuity. Needs and fashions for sport facilities change over time, but, once the land is lost, there is no flexibility. Assessing need for Green Infrastructure, Sport and Recreation should take account of future residents and changing desires and habits of the residents over time. The Draft does not do this.

**Policy CS17:** Financing infrastructure through developer contributions is difficult in Ipswich as net profit margins are low and contributions are challenged by developers on viability grounds. For example, Ipswich Garden Suburb required a grant of £9.8 million from the Housing Infrastructure Fund in order to proceed. The Draft needs to reflect this difficulty otherwise it is unsound.

**Policy CS20:** As mentioned above, Transport in Ipswich is an area of weakness. The Upper Orwell Crossings and Ipswich Northern Route were abandoned in 2019 by Suffolk County Council. There is no evidence that Suffolk will provide any major infrastructure during the plan period. In these circumstances, all development in Ipswich will add to existing congestion within the town with no reductions in carbon and an increase in pollution and AQMAs. This makes the Draft unsound on a fundamental level. An argument can be made that no major development should take place which would increase traffic until an effective town wide mitigation strategy has been put in place.

Reference to Park and Ride schemes is aspirational. There is no evidence that Suffolk CC or Ipswich BC will fund them.

**Policy DM1:** To be sound, this policy needs to be re-written to take account of the national zero carbon target of 2050. Although carbon for new builds will be less than under previous standards, the level of emissions under this policy will still increase during the plan period. The default position should be zero carbon.

## Continuation Sheet 2 – Oliver Holmes

**Policy DM2:** This policy should apply to all new build and not just 10+ residential or 1000sqm + commercial.

A 15% target is unlikely to be lawful under the net zero 2050 national objective and should be increased.

It also fails to take into account national policy on prohibiting gas boilers after 2025.

Extensions to residential property (including permitted development) will need to be compliant.

The policy should make it clear that permission will be refused unless it is compliant.

**Policy DM3:** Poor air quality in the five AQMAs in Ipswich is a result of road traffic – particularly NO2 and NOX. Mitigation needs to include a restriction on operational parking in commercial development. All new residential development needs to include significant contributions towards sustainable transport options.

The previous draft mentioned that modelling showed emissions in AQMAs were likely to increase and more AQMAs declared during the plan period. This cannot be allowed to happen.

**Policy DM16:** This needs to include a reference to zero carbon, as mentioned above.

**Policy DM21:** See comments on CS20 and DM3 above.

**Site Allocations – Policy SP17:** Town centre car parking generates car trips and is a significant contributor to carbon, and other, emissions within the town centre. Availability of parking is a disincentive to modal shift and more sustainable travel options. In order to be compliant with national zero carbon objectives, the Draft needs to acknowledge that car parking is material in an overall assessment of carbon emissions and the overarching objective of reducing carbon emissions. Reference to national policy and the Ipswich Climate Emergency needs to be made.

**SP17 is based on a flawed 2019 Parking Strategy:**

1. The Strategy does not acknowledge any contribution to carbon reduction that reduced car trips into Ipswich could make.
2. An assumption is made for modal shift of 10% of trips by the end of the plan period without any evidence.

### **Continuation Sheet 3 – Oliver Holmes**

- 3. No analysis is made of the number of long stay places in the Princes Street area which are used by train commuters or the origin of these trips which are likely to be from outside Ipswich. Such commuters provide very little if any economic benefit to Ipswich which may offset or mitigate the carbon and other pollution they cause.**
- 4. The Strategy assumes temporary car parks will disappear during the plan period without any evidence. Many of these car parks are of long standing and it seems likely the owners find them more profitable than redevelopment. If they are refused extensions of planning permissions after additional permanent parking in multi-storeys is provided, there is no certainty they will be refused permissions on appeal under economic arguments under the NPPF. Further, where they are located in areas not served by the three allocated sites, they have additional grounds of appeal. There is therefore a risk that additional car parking spaces will be provided through the new allocations without any decrease in existing temporary sites.**
- 5. The Strategy must be linked to a comprehensive and sustainable transport strategy for Ipswich.**
- 6. Temporary and long stay parking needs to be better differentiated in the Strategy. Economic grounds for shopping trips are greater than for commuter parking – which makes up the majority of existing spaces.**
- 7. No analysis is made in the Strategy as to the reasons park and ride schemes in Bury Road and potentially Nacton Road are not currently financially viable. Suffolk CC have stated that the major reason is the availability of cheap commuter parking within the town centre. Significant on-street commuter parking in the north and south of the town centre is not quantified.**
- 8. The contribution of emissions from drivers using the existing and proposed car parks towards poor air quality in the AQMAs is not quantified.**

As Ipswich BC is the owner of at least two of the allocated sites for multi-story car parks, there must be a suspicion that fee income is a driver of the Strategy rather than planning policy.

Until a proper analysis of car parking and its contribution to carbon and other pollution is made, no sites for multi-storey car parks should be allocated.



Sent by email to: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

01/03/2020

Dear Sir/ Madam

**Response by the Home Builders Federation to the consultation on the Ipswich Local Plan Review**

1. Thank you for consulting the Home Builders Federation (HBF) on the final draft of the local plan review. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

**Cross boundary strategic policies**

2. It would appear from the Council's evidence that they have co-operated effectively with neighbouring authorities to plan for housing needs across the Ipswich Strategic Planning Area (ISPA). Growth expectations are set out clearly in Policy ISPA1 and we would agree that based on the standard method the minimum number of homes to be delivered in the areas is circa 35,000 between 2018 and 2036. However, we cannot comment on whether this has translated into effective joint working regarding the cross-border infrastructure and sites issues set out in ISPA2 and ISPA3. It will be important that the Council can show that the cross-boundary issues concerning the deliverability of those sites in ISPA4 which will meet a considerable portion of the ISPA's housing needs will be addressed by the Council and the relevant agencies.

**Policy CS1: Sustainable development.**

**The policy is unsound as it is not consistent with national policy**

3. When the presumption in favour of sustainable development was first introduced the Planning Inspectorate (PINS) recommended that a policy reflecting this approach should be included in all local plans. This approach is no longer considered necessary by PINS and they have rescinded their original advice on this matter. Given this position and the fact that paragraph 16(f) of the National Planning Policy Framework (NPPF) states that policies in local plans should serve



a clear purpose and avoid any unnecessary duplication we would suggest this policy is deleted.

#### **Policy CS7: The amount of housing required**

The policy is not sound the housing requirement and stepped trajectory has not been justified

##### Housing requirement

4. Paragraph 55 of the 2019 NPPF states that the Council should establish a housing requirement figure for their whole area. The starting point for establishing this requirement is the local housing needs assessment calculated using the standard methodology. Using this methodology, we would agree with the Council that the minimum number of homes required to be provided for by the Council is 8,010 units between 2018 and 2036. However, it is also important to note that this is the minimum number of homes that should be provided. National policy and guidance recognise that there may be circumstances where the local planning authority may want to plan for the delivery of more homes than the local housing needs assessment. These circumstances are set out in paragraph 2a-010 and 2a-024 of PPG.
5. Firstly, 2a-010 of PPG outlines that Councils may need to plan for a higher housing to deliver growth strategies, where strategic infrastructure projects are likely to drive an increase in homes locally or there is an agreement to take unmet needs from a neighbouring authority. It is evident from the local plan that Ipswich are seeking to support economic growth with a drive to support at least 9,500 additional jobs and infrastructure improvements to facilitate that growth. However, we are concerned that this desire for growth is not being matched by the Council's decision to adopt a housing requirement that is below previous assessment of need with regard to economic growth. It is noted that the 2017 SHMA estimated that to meet expected job growth in Borough would require 11,220 homes to be provided between 2014 and 2036. This equates to 510 dwellings per annum (dpa) during the plan period significantly higher than the 445 dpa being planned for through the draft Local Plan.
6. The Council consider the issues of such uplifts in their Housing Topic Paper but reaches the conclusion at paragraph 26 that housing supply in general will increase within the IPSA as other authorities will be required to deliver more homes using the standard method. The implicit suggestion would appear to be that any additional growth required to support the economic growth of Ipswich will be covered by additional delivery elsewhere. However, there does not appear to be any assessment as to whether this will be sufficient and provided in appropriate locations to support the economic and job growth aspirations of Ipswich. Whilst we recognise that Ipswich's tight boundary constrains the Council's ability to promote significant levels of additional growth in its own area, the need to support its economic aspirations close to where new jobs will be created should have been

considered with a view to seeking the delivery of additional homes elsewhere in the ISPA.

7. Secondly, paragraph 2a-024 of the PPG states that an increase in the total housing figures may be considered where it could help deliver affordable housing. The Council recognise in paragraph 8.151 affordable housing need is 239 dpa, around 48% of their requirement and as such they will not meet all of their need for affordable housing. Consideration should have been given with the other authorities in the ISPA whether more sites could be allocated elsewhere in the ISPA to meet the affordable housing needs of Ipswich.

**Stepped requirement**

8. Part c of CS7 includes the Council's proposed stepped requirement of 300dpa for 2018-24 and 518dpa for the remaining period of the plan. Whilst we agree that the proposed requirement for the plan period represents the minimum number of homes to be planned for, we are concerned about the approach taken to the stepped requirement. Whilst the latest PPG makes provision for the adoption of such steps, their use and the way it is applied must be justified. In too many cases the step is required on the basis of the strategy chosen by the Council not on the basis that there were no other options available to the Council to ensure a more consistent delivery across the plan period. We recognise that Ipswich is a tightly constrained area and as such has more limited opportunities to meet needs. In this regard we would not disagree with the Council's justification to include a stepped trajectory.
9. However, we do not agree with the steps proposed. The aim would appear to be to set a modest target in order to provide the Council with a substantial buffer over the first years of the plan. This approach is not sufficiently challenging and is more likely to lead to the whole plan under-delivering. We would suggest that the requirement closely follows the delivery expectations of the Council in order to provide the necessary incentive to maintain supply and press forward with the approval of planning applications and the delivery of development. We would therefore suggest the following two stage stepped requirement:
  - 2018/19 to 2019/20 – 300
  - 2020/21 to 2023/24 – 375
  - 2024/25 to 2035/36 – 493
10. This would ensure the Council can maintain a five-year land supply on adoption whilst also ensuring a challenging requirement ensure the Council provides timely support for development across Ipswich.

**Housing supply**

11. We welcome the Council's decision to include a 10% contingency within its housing supply to ensure that housing needs are met in full. This contingency would appear to be supported within the Council's housing supply estimates with identified supply being 17% above the Council's housing requirement.

12. On the basis of the Council's stepped requirement and the supply trajectory as set out in the Housing Topic Paper the Council would appear to have a five-year housing land supply on adoption of the local plan. However, it is not evident as to which sites, either extant permissions or local plan allocations, form the basis of supply within the first five years of the plan as neither the SHLAA nor the Topic paper provide the necessary detail. The most up to date evidence we can find providing a detailed assessment of supply is on table 18 of the latest annual monitoring report. However, this table is not consistent with the chart provided at paragraph 28 of the Housing Topic Paper. It will be necessary for the Council to provide a detailed site by site assessment of delivery across the plan period to ensure the Inspector and those commenting on the plan have a good understanding of the delivery expectations. This is particularly important with regard to the five-year housing land supply given the amended definition of deliverable within the 2019 NPPF which outlines that if major development is to be considered deliverable within five years it must:
  - Be allocated for development, has a grant of permission, or is identified on a brownfield register; and
  - There is clear evidence that housing completions will begin on site within five years.
13. Until such evidence is provided, we cannot comment as to whether the Council's position is robust and as such, we reserve the right to comment on this issue as part of the examination of the local plan.

#### Recommendations on CS7

14. In order to make the plan sound the Council will need to:
  - Justify why they have not considered a higher housing requirement that better meets their jobs growth assessments and affordable housing needs. Whilst we recognise that Ipswich is constrained the Council should have looked to secure additional provision within neighbouring areas;
  - Set a more challenging stepped trajectory that is more closely linked to expected supply; and
  - Provide evidence as to the delivery rates for the specific allocations and other sources of housing supply within the local plan to ensure these can be scrutinised effectively.

#### **CS12 Affordable housing**

##### The policy unsound as it is not consistent with national policy

15. Policy CS12 states that affordable housing provision outside the Ipswich Garden Suburb and Humber Doucy Lane should be at least 15%. The requirement should be set at 15% and not be considered to be the lower end of a potentially higher requirement. Policies, as set out in paragraph 16 of the NPPF need to provide clarity as to the expectations of the Council. Phrases such as "at least" do not

provide the necessary clarity for either applicants and decision makers that is expected by paragraph 16 of the NPPF and should be removed from this policy.

16. The revised NPPF has changed matters significantly with the role for viability now being primarily at plan making stage. This is set out in paragraphs 34 and 57 of the NPPF with supporting guidance in paragraphs 10-001 to 10-019 of the PPG. Given the Government's position that decision makers can assume that policy compliant development is viable it is important that local policies take account of situations where development is more marginal.
17. We are therefore concerned that the viability assessment may have underestimated the level of abnormal costs that occur when developing brownfield sites. The Viability assessment includes such costs on all sites of £175,000 per net developable acre (roughly £430,000 per net developable hectare). However, work undertaken by the HBF for the viability assessment of the Durham Local Plan indicated that this averaged, on the four PDL sites tested, £711,000 per net developable hectare. We recognise that this evidence is not directly relatable to development in Ipswich but it does provide an indication as to the potentially very tight margins on development in the Borough. Given the Viability Assessment shows that development of brownfield land is marginal the Council may need to consider a lower requirement on such sites, or amending other policy requirements in the plan, if it wants to maximise the delivery of such sites.

#### **DM7: Provision of private outdoor amenity space in new and existing developments**

*The policy is unsound as it is not consistent with national policy or justified*

18. This policy is too prescriptive as to the levels of open space that are required for homes within Ipswich. Whilst we recognise the importance of outdoor space it should be for the developer to decide the level of provision within each site. Housebuilders understand the market and the amount of open space that people expect and as such this policy needs to be rewritten to provide a greater degree of flexibility. It is also the case that Ipswich is a highly constrained authority and if the Council is seeking to set standards for open space within developments and meet its housing requirements it will need to offer flexibility within other policies such as the provision of private outdoor amenity space. We would suggest the following wording:

*"To ensure that new residential developments deliver a high quality and environmentally sustainable living environment, developments for houses and ground floor maisonettes will be required to incorporate well-designed and located private outdoor amenity space of an appropriate type and amount. When considering the provision of outdoor amenity space applicants should have regard to the need to meet other density and urban design requirements of the plan."*

*All private gardens and other outdoor amenity spaces should be safely accessible to occupants, designed to take advantage of sunlight and daylight and provide a functional space having regard to the mix of housing/types to be provided."*

#### **DM21: Transport and Access In new developments**

Part c is unsound as it has not been justified.

##### *Part c - electric vehicle charging points*

19. The HBF prefers a national and standardised approach to the provision of electrical charging points in new residential developments. We would like this to be implemented through the Building Regulations rather than through local planning policy. If the Council does choose to make policy in this area there are several issues that it will need to consider carefully.
20. We note that the consultation includes a requirement to include electric vehicle charging points on all new developments. Firstly, the policy lacks clarity as it does not state the amount of charging points that should be provided. The NPPF requires that any policy, including a requirement for charging points, should be clearly written and unambiguous (para 16). The policy will need to specify the quantum and type of provision sought either AC Level 1 (a slow or trickle plug connected to a standard outlet) or AC Level 2 (delivering more power to charge the vehicle faster in only a few hours) or other alternatives.
21. The Council's work should be supported by evidence demonstrating the technical feasibility and financial viability of these requirements. The Council must justify any requirement by including confirmation of engagement with the main energy suppliers to determine network capacity to accommodate any adverse impacts if all, or a proportion of dwellings, have charging points. We argue this because if re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables. This might mean that new sub-station infrastructure is necessary increasing the cost of provision. There may also be practical difficulties associated with provision to apartment developments or housing developments with communal shared parking rather than houses with individual on plot parking.

##### Recommendation

22. Without the necessary justification and clarity, we would suggest that part c is deleted.

#### **DM22 - Car and Cycle Parking In New Development**

This policy is unsound as it is inconsistent with national policy

23. The policy states that they will require adopted standards for car and cycle parking to be complied with. However, it must be noted that these standards are not set out in the local plan but in supplementary guidance. We are concerned that such standards, which are issues of policy as they can be used to refuse an application if they are not met, being set out in guidance and not the plan itself. Legislation is clear that policy issues must be set out in local plans. This is to ensure that should these standards change then appropriate consultation and public scrutiny of these changes is undertaken.

Recommendation

24. Two options are open to the Council, they can either include the standards as an appendix in the local plan or state in policy that development will need to have regard to the standards.

**Conclusions**

25. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, in the following key areas:

- Policy CS1 repeats national policy and is therefore inconsistent with paragraph 16 of the NPPF;
- The housing requirement seeks to meet minimum needs however we are concerned that this may not address the jobs growth expected in Ipswich and will not address affordable housing needs;
- The proposed steps within the stepped requirements are not justified and should better reflect delivery expectations;
- We could find no evidence on the delivery trajectories for specific allocations and other sources of supply have been provided in the evidence base;
- The viability evidence indicates that the majority of brownfield development at the proposed affordable housing rates would be marginal at best;
- The private outdoor space requirements are insufficiently flexible;
- The policy on electric vehicle charge points lack clarity and is not justified;
- That parking requirements must be included in the plan or, if not, the policy should be amended so that development only has to have regard to these standards.

26. We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



**Mark Behrendt MRTPI**  
**Planning Manager – Local Plans**  
**Home Builders Federation**

**Felicia Blake**

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**From:** Daniel Hudson  
**Sent:** 24 February 2020 12:57  
**To:** PlanningPolicy  
**Subject:** Site Reference IP010b Felixstowe Road

With regard to the proposals for Site Reference IP010b Felixstowe Road, I would be very much in favour of such a change. Particularly for the portion of the site currently occupied by Ardent Hire Solutions.

The various named businesses that have operated from that land have seen a big increase in business over the years and as such have contributed to a large increase in noise at all times of the day, and sometimes night.

It is a wholly inappropriate location for such a business with the amount of foot traffic from both children heading to school and the more elderly heading to the doctors. Add to that the damage they continue to do to the road surface as they struggle to make the turn out onto the main road as the trailers "bottom out".

D. Hudson

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

|



Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

Your Ref:

Our Ref:

Ipswich Borough Council,  
Planning Policy,  
3W Grafton House,  
15-17 Russell Road,  
Ipswich,  
IP1 2DE  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

18 February 2020

Dear Sir / Madam

**Consultation on the Ipswich Borough Council Local Plan Core Strategy and Policies  
Development Plan Document Review – Final Draft for comments for the provision of Healthcare  
(2016- 2036)**

### **1.0 Introduction**

1.1 Thank you for consulting Ipswich & East Suffolk CCG on the above comments for the provision of Healthcare for the Ipswich Borough Council Local Plan, Proffered Options (LP). This new LP will look at the major factors involved in producing sustainable, vibrant and flourishing communities via planning for the future. This LP looks at spatial strategies, economy, tourism, transport and many other factors that will have an impact in producing viability in production until 2036.

1.2 In reviewing the context, content and recommendations of the LP and its current phase of progression, the following comments are with regard to primary healthcare provision on behalf of Ipswich and East Suffolk Clinical Commissioning Group (CCG) and .

1.3 Comments on the wider impact of planned growth on all local Health services and Infrastructure needs to be co-ordinated through wider consultation with the health economy and CCG led forums established to inform the Sustainability and Transformation Plan for the locality. The implementation of the plan will result in extensive transformation to the way that health and care services are delivered, potentially including changes to the physical infrastructure.

### **2.0 Existing Healthcare Position in the Emerging Plan Area**

2.1 The LP consultation covers the administrative area of and Ipswich Borough Council, with reference to the wider areas of Suffolk including Babergh and Mid Suffolk District Council's and Suffolk Coastal District Council

**2.2** Currently within the administrative area of Ipswich Borough Council, healthcare provision incorporates a total of 13 GP Practices (a number of which include health centres) and 2 branch surgeries, 36 pharmacists, 26 dental surgeries, 20 opticians, 1 Acute hospital and 6 clinics.

**2.3** These are the healthcare services that the LP must take into account in formulating future strategies.

**2.4** Growth, in terms of housing and employment, is proposed across a wide area and would likely have an impact on future healthcare service provision. This response relates to the impact on primary care services, secondary care services, community and mental health services.

**2.5** In terms of optimal space requirements to encourage a full range of services to be delivered within the community there is an overall capacity deficit, based on weighted patient list sizes<sup>1</sup>, within the 13 GP Practices and 2 branch surgeries providing services in the area.

**2.6** The CCG, Local Authorities and local stakeholders has begun to address Primary Care capacity issues in the area and currently have projects to increase capacity underway across the Ipswich Borough Council area. These projects vary in size and will initially deliver additional capacity to meet previously identified growth requirements.

**2.7** Optimal space standards for primary care are set for planning purposes only. This allows us to review the space we have available and identify the impact development growth will have in terms of capacity and service delivery. As commissioners, we work closely with Practices to support their capacity needs and in line with policy changes and new models of care, an increase in footprint is not the only option to increase capacity, working across Primary Care Networks, practices are encouraged to utilise all Estate within their Primary care network patient catchment area. Other options include increasing Digital technology services and utilising community assets for services that do not require a specialist clinical environment. - there were no specific comments received from the NHS Trusts at this time.

**2.8** Upon review some existing health infrastructure will require further investment and improvement in order to meet the needs of the planned growth shown in this LP. The proposed growth scenarios contained within would have an impact on healthcare provision in the area and its implications, if unmitigated, may not be sustainable long term.

### **3.0 Identification and Assessment of Policies and Strategies that have Healthcare Implications**

**Below are comments on behalf of the following:**

- Ipswich & East Suffolk CCG
- East Suffolk and North Essex NHS Foundation Trust
- Norfolk and Suffolk NHS Foundation Trust
- East of England Ambulance Service NHS Trust

**3.1 POLICY ISPA2 Strategic Infrastructure Priorities** – The CCG is very happy to see that health provision is identified as key infrastructure and will work with the council and alliance partners in providing holistic healthcare for the residents of Ipswich.

**3.2 POLICY ISPA4 Cross Boundary Mitigation** – Any areas of cross boundary developments, health would be looking for developer contributions from the LPA of the development even if the infrastructure is located within a different LPA. The agreement to work with East Suffolk Council will make requesting cross boundary mitigation easier and this is welcomed by the CCG. The development area near Humber Doucy Lane is within the catchment area of Two Rivers Medical Centre and the CCG anticipates that primary care provision would be prescribed here and subsequently negate the need for primary health being located near the area.

**3.3 POLICY CS2 The Location and Nature of Development** – Designing developments in such a way that encourages the use of more sustainable modes of transport to get to community infrastructure is welcome and will help in the NHS preventative aspirations being obtained.

**3.4 POLICY CS5 Improving Accessibility** – The accessibility of infrastructure is a key factor in designing a development that is aimed at meeting environmental and health objectives. Despite the desire to have all community infrastructure within easily accessible locations, it might not always be possible for health but this does not mean that community space could not be accessible to provide community healthcare services on an ad hoc basis.

**3.5 POLICY CS8 Housing Type and Tenure** – The CCG and Alliance partners would be willing to be involved in any discussions involving assisted living and residential care homes. This area of development puts strain on all healthcare providers in the area and being involved in discussions from the earliest stage possible will help primary, secondary, community and mental health care mitigate the impact.

**3.6 POLICY CS10 Ipswich Garden Suburb** – Despite the relatively large size of the garden suburb development, primary care will be provided for the new patients at both Two Rivers Medical Centre and the new health centre proposed at the Tooks Bakery site. Community health services might be provided closer to the development but discussions would need to be had with the Alliance partners.

**3.7 POLICY CS11 Gypsy and Traveller Accommodation** – The CCG will be happy to be involved in any proposed gypsy and traveller site discussions to ensure that the residents will be able to access primary care.

**3.8 POLICY CS16 Green Infrastructure, Sport and Recreation** – The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.

**3.9 POLICY CS17 Delivering Infrastructure** – S106 is very important when providing health infrastructure and up until recent this has just been accessible to primary care providers through the CCG. NHS England has now provided instructions that all health providers should be looking to request mitigation through S106 or CIL as part of the planning application response process. As part of this process, developments over 250 dwellings will automatically go to the Alliance partners in health for them to make representation and request mitigation. The inclusion of GP surgeries and health centres as key strategic infrastructure is to be commended as this will allow the CCG to strategically plan ahead with the understanding that providing the business case is sustainable it will more likely get approval.

**3.10 POLICY CS19 Provision of Health Services** – There were no specific comments received from the acute trust (ESNEFT) at this time. The support of primary care infrastructure is very welcome and the CCG will always provide facilities that meets the needs of patients but due to a number of factors adhering to the policy of building near the town centre, district or local centre will be difficult. GP surgeries have catchment areas and these might be in conflict with your district or local centres. Primary Care Networks (PCNs) are being introduced to provide a variety of services through a number of surgeries working together and this could influence the location of any new health facility.

Chapter 8.229 There were no specific comments received from the acute trust (ESNEFT) at this time.

Chapter 8.230 There were no specific comments received from the acute trust (ESNEFT) at this time.

Chapter 8.231 As participants in the Ipswich and East One Public Estate (OPE) the platform is available to make sure that all public buildings are fully utilised. Aside from OPE all of the local health partners meet as part of an Integrated Care System (ICS) and the re-use of sites no longer required by a provider is discussed and only after extensive study would a building be permitted for non-public uses.

Chapter 8.232 The CCG does have plans and work is ongoing regarding provision of primary care in and around Ipswich. A number of feasibility studies are currently taking place with the goal of finding an estates strategy for Ipswich that covers the period of the plan. These feasibility studies are being produced with the support of the OPE and it is hoped that whatever strategy is adopted, the LPAs will support it.

**3.11 POLICY DM5 Protection of Open Spaces, Sport and Recreation** - The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.

**3.12 POLICY DM6 Protection of Open Spaces, Sport and Recreation Facilities** – The proposal to request non-residential developments of 1000 sq. m floor space or more to include facilities for employees is to be applauded. The NHS is looking at preventative measures to reduce the number of people requiring medical help and initiatives like this will help to promote health and wellbeing.

**3.13 POLICY DM12 Design and Character** – Designs that have a multi-functional use in a commercial or community building could help provide the flexibility required to deal with future demand whichever form this might evolve. NHS organisations are beginning to design buildings with this multi-functionality in mind so that rooms can be accessed by multiple organisations, each performing a different service. The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.

**3.14 POLICY DM24 Protection and Provision of Community Facilities** – The CCG along with Ipswich Borough Council will be looking at short term, medium term and long term strategies for primary care. As part of this, the aim is for all of the health providers in the area of Ipswich to provide an Infrastructure Delivery Plan (IDP). This document will allow all of the interested parties to work cohesively in identifying land and properties that are surplus to requirements and contrarily, if land acquisition could be required. This close working relationship will be key in this process working as effectively as it possibly can going forward.

It is important to remember that improved or newly created infrastructure, alone, will not fully mitigate the impact of development growth. Resource and revenue implications provide a very significant risk to the delivery of primary care services and we should continue to work together to identify ways in which sustainable health care services can be delivered and how development can contribute to healthy communities and the training and recruitment of health care professionals. Issues that are arising from the LP are listed in the table below with comments on behalf of Ipswich & East Suffolk CCG.

#### Issues arising from the Local Plan

| Description of Issues                                                                                                                                                                                             | Primary Care Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ipswich Garden Suburb. District & Local Centres including community buildings with integrated library facilities & police office (where required) alongside new health centre & reserved sites for community use. | NHS England are not dispensing new primary care contracts currently so the opportunities of establishing a new health centre in the Ipswich Garden Suburb are severely reduced. Mitigation for the increase in patients from the proposed Ipswich Garden Suburb will be spread between Two Rivers Medical Practice and the new healthcare facility at Tooks.                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Cross-boundary issues                                                                                                                                                                                             | The possibility of issues arising from developments near to local authority boundaries with regards to healthcare provision is prevalent in the LP. The developments of Ipswich Suburb, continued development of Ravenswood and Whitton are examples of these possible cross boundary developments. Communication and cooperation will be vital in making sure that all appropriate stakeholders are aware of developments and mitigation can be sought in a timely manner. Cooperation will be required between the CCG, Ipswich Borough Council, Suffolk Coastal District Council and Babergh & Mid Suffolk District Councils to make sure that the land North of Ipswich which is designated as large development sites in both local authority local plans is accounted for in mitigating health. |
| Chapter 4.1 Duty to Cooperate                                                                                                                                                                                     | The CCG welcomes this statement and hopes that communication between Ipswich Borough Council and ICS partners will increase as we move through the planning stages.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Chapter 5.4 Deprivation Issues                                                                                                                                                                                    | Health care providers in areas of deprivation are under more pressure than those in areas where deprivation is lower. Due to the extra strain put on health providers in                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

|                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                | areas of high deprivation, morale and recruitment is lower than areas where the level of deprivation is less. Tackling areas of the highest levels of deprivation must be seen as a priority going forward as the resources required to provide health care in these areas is currently unsustainable.                                                                                                                                                                                                                                                                                                                                                                                    |
| Chapter 5.25 Managing the additional travel demands that growth will generate. | it is good to see that the benefits of health and wellbeing are being considered in initiatives not intrinsically linked to health. Creating a safe and sustainable link between new developments and areas of commerce and community is essential, be it via a well-lit walking path, cycle path or green corridors. The benefits to resident's wellbeing should not be overlooked as linking people that would otherwise be isolated can have a major benefit to mental health.                                                                                                                                                                                                         |
| Chapter 5.26 Health and Wellbeing                                              | As health care providers, we aim to provide health care facilities in a timely manner that is in line with the growth. The physical building of a health and/or social facility or improving one is relatively acquirable in most circumstances but there is currently a national shortage of NHS staff in both primary care and secondary care and that provides issues around capacity. LPAs can help aid recruitment by providing local communities that will attract NHS staff to them, by producing key worker housing in and around NHS campuses and facilities, encouraging commerce, designing and creating a vibrant and attractive community that people want to be associated. |
| Chapter 6.8 The Objectives                                                     | 10. Community Facilities and Infrastructure – The CCG is undergoing a data gathering exercise for all primary care facilities in Suffolk with the aim of providing a 6-facet survey. The outcome of this project will be reliable data showing the CCG the general physical condition of all primary care facilities. Once this information is known the CCG will be in a better position to know which facilities require improvement and which facilities are in good condition.                                                                                                                                                                                                        |

3.11 The CCG (and NHS Trusts on developments over 250 dwellings) will have further comments to make as details of specific developments become available. In order to provide a more detailed response, a clearer understanding of phasing and anticipated trajectory will be required.

3.12 The provision of assisted living developments and residential care homes, although a necessary feature of care provision and to be welcomed, can pose significant impacts on local primary care provision and it is important that planners and developers engage at a very early stage with the CCG, to plan and implement suitable mitigations.

3.13 It is also important we continue to be consulted in relation to emerging Neighbourhood Development Plans in order to work with local communities to deliver and maintain sustainable healthcare.

#### 4.0 Conclusions

4.1 This response follows a consultation by Ipswich Borough Council.

4.2 In its capacity as healthcare commissioner, NHS England and the CCG have requested that the Local Planning Authority identifies policies and strategies that are considered to directly or indirectly impact upon healthcare provision and has responded with comments to help shape future policy.

4.3 NHS England has identified shortfalls in capacity at existing premises covered by the LP. Provision needs to be made within the LP to address the impacts of development on health infrastructure and to ensure timely cost-effective delivery of necessary infrastructure improvements, in the interests of pursuing sustainable development.

4.4 The recommendations set out above are those that NHS England and the CCG deem appropriate having regard to the projected needs arising from the Ipswich Borough Local Plan. However, if the recommendations are not implemented then NHS England reserves the right to make representations about the soundness of the plan at relevant junctures during the adoption process.

Yours faithfully

**Jane Taylor, Senior Estates Development Management, Ipswich & East Suffolk Clinical Commissioning Group**

cc:

Caroline Procter – Ipswich & East Suffolk CCG  
Daniel Turner – Ipswich & East Suffolk CCG  
Chris Crisell – Ipswich & East Suffolk CCG

**From:** Mike Hancock  
**Sent:** 26 February 2020 11:31  
**To:** Michael Hammond  
**Cc:** PlanningPolicy  
**Subject:** Re: Ipswich RFC - Land At Humber Doucy Lane, Ipswich IP4 3PZ

Dear Sir

**PROPOSED LOCAL PLAN SITE ALLOCATION**

**1P184b - Land at Ipswich RFC HUMBER DOUCY LANE IP43PZ**

In light of the recent notice regarding land allocation adjacent to Ipswich RFC, Humber Doucy Lane IP43PZ

I would like formally register comments of behalf of Ipswich Rugby Football Club and to request a meeting to discuss 2 specific points.

**1** The absence of land 1P184b in any allocation. This land is a driveway and a grassed playing area for youth and junior rugby. It also serves as overspill car parking on busy senior match days. It is not large enough for a full size pitch and is therefore only generally used by Under 11 & Under 12 years age groups).

**2** Replacement facilities for any loss of land currently used for playing and training by Ipswich RFC that abuts IP184b (part of land identified as ISPA4.1 in your most recent PROPOSED LOCAL PLAN SITE ALLOCATION

Please note that Ipswich RFC is now in its 150th year. It continues to serve the local rugby playing community including making provision for a growing interest in girls and women's rugby. It runs rugby for 11 age groups from under 6 through to under 18's. It runs 3 men's senior teams, a women's team and 2 fledgling girls age group teams. All sections of our club are growing.

The club already has a requirement for extra land to meet the demands being made upon it.

We currently lease land adjacent to IP184b to meet demand (as well as hiring an all weather floodlit facility nearby on a weekday evening as we do not have sufficient floodlit space at Humber Doucy Lane).

Ipswich RFC requires at least one more full size rugby pitch and an all weather floodlit facility plus 100-150 more hard standing car parking spaces to better meet the demands being made upon it.

Our clubhouse facilities are not at the required standard. We require additional changing room facilities and well as improved gender separation for changing rooms and disabled toilets.

In short we are bursting at the seams and struggling to meet the demands made upon us by the local rugby community due to the successful endeavours of dozens of volunteers.

**We do not wish to be omitted** from any land allocation with the view that any subsequent funds realised by land sale could greatly assist the club in better meeting the demands currently being placed on it. Moreover we are seeking to expand our offering to the local rugby community

should larger replacement playing facilities adjacent to our current pitches be made available or a new site identified.

We recognise that the majority of our land ownership falls within East Suffolk Council but we primarily serve the needs of Ipswich Borough Council residents.

We have had plans drawn up for a new clubhouse under guidance from the Rugby Football Union. We are also looking at a separate project with a phased extension/refurbishment of the existing clubhouse. However we seem to be in a permanent CATCH 22 situation of not knowing what may happen with land allocation for planning and find it difficult to make progress with any development plans.

Your acknowledgement of receipt of this e-mail would be welcome ahead of the consultation period end (1145 March 2nd 2020).

I would be obliged if a meeting could be arranged to discuss the contents of this letter and any broader issues that could help enhance Ipswich RFC's offering to the local community.

With kind regards

Mike Hancock  
Chairman  
Ipswich RFC

On Tue, 12 Mar 2019 at 10:15, Michael Hammond <[Michael.Hammond@ipswich.gov.uk](mailto:Michael.Hammond@ipswich.gov.uk)> wrote:

Dear Mr Hancock,

Thank you for your email regarding Ipswich RFC's land at Humber Doucy Lane. Apologies for taking so long to formally respond.

On behalf of the RFC you helpfully completed and returned the form we sent you regarding the RFC's land and confirmed that the draft site sheet assessment (January 2017) was accurate. This response was used to help inform our draft Strategic Housing and Employment Land Availability Assessment (SHELAA). A copy of your response is attached for ease of reference. A link to the draft SHELAA as published is available to view on the link below. The RFC land is identified under site reference IP184b (pages 166 – 167):

<https://www.ipswich.gov.uk/sites/default/files/draft strategic economic land availability assessment - jan 2019.pdf>

As you may be aware, Ipswich Borough Council is currently undertaking a review of its Local Plan to help guide development of the Borough to 2036. A consultation on the Preferred Options of the Local Plan commenced on 16<sup>th</sup> January and will end on 13<sup>th</sup> March.

As part of this process, the Council is required to identify potential sites that may be suitable for residential development over the Local Plan period. This is informed by evidence gathered as part of the SHELAA exercise. It is important to note that the identification of potential sites do not act as planning applications nor do they constitute planning permissions.

Under the preferred options Local Plan we are identifying a broad location at the northern end of Humber Doucy Lane that may potentially deliver appropriate residential development and associated infrastructure after 2031. Further information regarding this broad location for development can be found in the Core Strategy and Policies Development Plan Document under Policy ISPA4 (page 30). A link to this document and a link to the accompanying policies map can be found below.

[https://www.ipswich.gov.uk/sites/default/files/combined core strategy with a3 sheet review preferred options - clean 030119.pdf](https://www.ipswich.gov.uk/sites/default/files/combined_core_strategy_with_a3_sheet_review_preferred_options - clean 030119.pdf)

[https://www.ipswich.gov.uk/sites/default/files/local plan policies map ipswich - preferred options draft nov 2018.pdf](https://www.ipswich.gov.uk/sites/default/files/local_plan_policies_map_ipswich - preferred_options_draft_nov_2018.pdf)

This broad location covers the Ipswich RFC's land along with the adjoining land owned by Kesgrave Covenant and WO & PO Jolly (Ipswich) Ltd. At this stage, this broad location does not specify precisely which sites covered by this broad location may or may not be required to deliver development in this area.

It should be made clear that the proposals map and identification of the RFC's land as part of this broad location does not represent the land ownership status of this land nor any other parcel of land in the Borough. We fully acknowledge and are aware that part of the land within the broad location is within the ownership of the RFC.

The ISPA4 Policy states at criterion b that replacement sports facilities, if needed, will need to be included as part of the infrastructure requirements to deliver development in this location. Therefore, any development on the broad location that would affect the RFC facility would either need to retain the existing sports facility, provide a replacement facility or demonstrate that equal or greater provision is delivered at an alternative site.

In terms of notification as part of the Local Plan process we have now added you to our mailing list so you will receive notifications of all future documents which get published. If you wish to comment on the ISPA4 Policy please follow the instructions on the "How to Comment" section of the website below:

<https://www.ipswich.gov.uk/ipswichfuture>

In addition to the above, officers would welcome the opportunity to discuss the Local Plan process and understand your position if you would be open to this? Please let me know if so and we can arrange an appropriate date to meet.

Please let me know if you require any clarification on any of the above.

Yours sincerely,

Michael Hammond

**Michael Hammond**

Senior Planning Policy Officer

Planning and Development

01473 432905

[michael.hammond@ipswich.gov.uk](mailto:michael.hammond@ipswich.gov.uk)  
Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1 2DE

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Mike Hancock  
Classic Hand Tools

+44 (0)1473 784983  
[www.classichandtools.com](http://www.classichandtools.com)

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:

[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>Core Strategy and Policies DPD<br/>Site Allocations and Policies DPD<br/>Proposals Map</b>                                                                                                                                                           |
| <b>Please return this comments form to:</b>                          | <b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b><br><br><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                         |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                                |

#### **PART A PERSONAL DETAILS**

|                                               | <b>1. Personal details</b>        | <b>2. Agent's details (If applicable)</b>                           |
|-----------------------------------------------|-----------------------------------|---------------------------------------------------------------------|
| <b>Title</b>                                  | Mr                                | Mr                                                                  |
| <b>First name</b>                             | Paul                              | Matt                                                                |
| <b>Last name</b>                              | Wranek                            | Clarke                                                              |
| <b>Job title (where relevant)</b>             | Bursar and Clerk to the Governors | Director, Head of Boyer Colchester                                  |
| <b>Organisation (where relevant)</b>          | Ipswich School                    | Boyer                                                               |
| <b>Address<br/>(Please include post code)</b> | c/o Agent                         | 15 De Grey Square<br>De Grey Road<br>Colchester<br>Essex<br>CO5 4YQ |
| <b>E-mail</b>                                 | c/o Agent                         |                                                                     |
| <b>Telephone No.</b>                          | c/o Agent                         |                                                                     |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                                                  |
|----------------------------------------------------------------------|--------------------------------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Matt Clarke, Boyer (on behalf of Ipswich School) |
|----------------------------------------------------------------------|--------------------------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.                                                                | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-----------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Core Strategy and Policies DPD - Diagram 3: The Ipswich Key Diagram and Para. 7.2 (iv)</b> | <p>Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as "<i>Land Allocated for Sport Use</i>" on the basis that it is not required for this purpose.</p> <p>The release of the Ipswich School land at Notcutts Field, as part of the allocated Ipswich Garden Suburb is not currently considered viable and is therefore uncertain, whilst in any event the school owns other land that would provide suitable alternative land for replacement playing fields within the vicinity and has already invested significantly into new and improved facilities at its Rushmere St Andrew Sports Centre.</p> <p>Instead it is proposed that the site is allocated for residential development (21.81ha, with capacity for 500 dwellings).</p> <p><b>Please see accompanying letter for further details.</b></p> |
| <b>Core Strategy and Policies DPD – Policy CS2: The location and nature of development</b>    | <p>Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), under CS2 (b), with suggested alternative reference to allocation of land off Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings).</p> <p>This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.</p> <p><b>Please see accompanying letter for further details.</b></p>                                                                                                                        |

| <b>Document(s) and document part.</b>                                                         | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>Core Strategy and Policies DPD – Policy CS7: The amount of new housing required</b>        | <p>Object to inclusion of land at the northern end of Humber Doucy Lane (ISPA4.1) within the land supply and replacement with reference to land west of Tuddenham Road, north of Millenium Cemetery (21.81ha, with capacity for 500 dwellings).</p> <p>Object to omission of any reference to the need for Inclusion of a 20% buffer to the 5 Year Housing Land Supply, in light of latest Housing Delivery Test information (2019 Measurement, released February 2020); to the need to also address the emerging delivery shortfall in this regard (77 dwellings within the first year); and also the need for increased focus on identification of sites that are deliverable in the initial 5 year period.</p> <p>It is also felt that the allocated sites component of housing supply should be increased on the basis that not all of the sites relied upon will be guaranteed to deliver within the Plan Period, having regard to the fact that a proportion of these have been allocated in the Local Plan since 1997 without having yet come forward, whilst others are reliant on the securing of alternative sites for relocation of existing uses in the first instance.</p> <p><b>Please see accompanying letter for further details.</b></p> |
| <b>Core Strategy and Policies DPD – Policy ISPA4: Cross boundary working to deliver sites</b> | <p>Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), in the context of Policy ISPA4, with suggested alternative reference to allocation of land west of Tuddenham Road, north of Millenium Cemetery (21.81ha, with capacity for 500 dwellings), albeit not necessarily therefore involving cross boundary working given containment within Ipswich Borough.</p> <p>This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.</p> <p><b>Please see accompanying letter for further details.</b></p>                                                                                                                                                                                                                                                                                                                                                                                           |

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b>                                              | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Site Allocations and Policies</b><br><b>DPD – Site Ref:</b><br><b>ISPA 4.1</b> | <p>Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), with suggested alternative allocation of land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings), albeit not necessarily therefore involving cross boundary working given containment within Ipswich Borough.</p> <p>This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.</p> <p><b>Please see accompanying letter for further details.</b></p>                                                                                                                        |
| <b>Site Allocations and Policies</b><br><b>DPD – Omission Site</b>                | <p>Object to omission of land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings) as a residential allocation.</p> <p>This is on the basis that the site is not required for relocation of sport use and would represent a sustainable residential development opportunity, able to take advantage of close proximity to the Ipswich Garden Suburb development through direct pedestrian and cycle connection, reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.</p> <p>The proposed site allocation could also offer additional flexibility of supply in light of concerns raised in our representations over the certainty with which allocated sites could be relied upon to deliver within the Plan Period.</p> <p><b>Please see accompanying letter for further details.</b></p> |
| <b>Proposals Map</b>                                                              | <p>Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as "<i>Land Allocated for Sport Use</i>" on the basis that it is not required for this purpose.</p> <p>The release of the Ipswich School land at Notcutts Field, as part of the allocated Ipswich Garden Suburb is not currently considered viable and is therefore uncertain, whilst in any event the school owns other land that would provide suitable alternative land for replacement playing fields</p>                                                                                                                                                                                                                                                                                                                                                                                                                             |

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                            |
|--------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                      | <p>within the vicinity and has already invested significantly into new and improved facilities at its Rushmere St Andrew Sports Centre.</p> <p>Instead it is proposed that the site is allocated for residential development (21.81ha, with capacity for 500 dwellings).</p> <p><b>Please see accompanying letter for further details.</b></p> |

**Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.**

#### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

**Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.**

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

#### **PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

2<sup>nd</sup> March 2020  
Our Ref: MC

15 De Grey Square  
De Grey Road  
Colchester  
Essex  
CO4 5YQ

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
Suffolk  
IP1 2DE

Dear Sir/Madam,

**Re: Response to Public Consultation for the Ipswich Local Plan Review Final Draft  
(Regulation 19) on behalf of Ipswich School**

**1. Introduction**

- 1.1 These representations relate to land west of Tuddenham Road, north of the Millennium Cemetery and bounded by railway lines to the north and west (*centred on OS Ref 178 471*). The land in question, which measures 21.81 ha, is owned by Ipswich School, on whose behalf these representations are hereby made, and is currently in agricultural use. Please see contextual map within Masterplan document provided at Appendix 1, with the above site annotated as "*Proposed Residential Allocation*" alongside other relevant sites owned by Ipswich School that are referred to below.
- 1.2 The Ipswich Key Diagram (Diagram 3, p35 of Core Strategy and Policies DPD) shows the above site as "*Land Allocated for Sport Use*" and partially (northern portion) as "*Green Trail*" albeit on a diagrammatical illustration.. It is noted that the Draft Proposals Map also designates the site as "*Land Allocated for Sport Use*." The owners of this site wish to object to designation of this land for sport use on the basis that neither the need for such use has been fully evidenced, nor has the viability of creating such facilities been established.
- 1.3 The background to this designation relates back to allocation of the Ipswich Garden Suburb site in the Adopted Local Plan, which is indeed carried forward into this current review as part of the development strategy for the town (Policies CS2 and CS10). Within Policy CS10 it is stated that "*the land to the west of Tuddenham Road north of the railway line is allocated for the replacement playing fields necessary to enable development of the Ipswich School playing field site as part of the Garden Suburb development.*" This is elaborated upon within supporting text at Para. 8.135.
- 1.4 Ipswich School have consistently stressed that they would only release their land off Valley Road (known as Notcutts Field) if it were viable to do so, namely in respect of the costs of providing new facilities being met or exceeded by receipts from the sale of the site. As the

viability of relocation is by no means certain at this time, the assumption of relocation of sports facilities to land to the west of Tuddenham road is premature and has the effect of sterilising a viable housing allocation when another alternative site is available for sports facilities (see below).

- 1.5 Furthermore, in the event that the viability position were to improve in the longer-term, it is not considered that the allocated playing fields relocation site west of Tuddenham Road is definitively required in this context. This is because the School owns other land that would provide suitable alternative options in this regard. This includes land (extending to approximately 17ha) to the north of Westerfield, on either side of the B1077 (Westerfield Road).
- 1.6 This land is flat and level and therefore readily capable of accommodating the requisite sports pitches without being obtrusive in the surrounding landscape or giving rise to unacceptable amenity impacts, with scope to provide screen planting and off-set from any neighbouring residential properties. This site is located only marginally further away from the school than the Tuddenham Road site, and in fact closer than their Sports Centre facility at The Street, Rushmere St Andrew. Please see contextual location plan within Masterplan Document at Appendix 1, and specifically the site annotated as "***Alternative Playing Fields Site.***"
- 1.7 In this connection, it should also be noted that in recent years significant investment in sports facilities has already taken place at the Rushmere Sports Centre, including the creation of a number of all-weather pitches.
- 1.8 It is therefore felt that allocation of the land west of Tuddenham Road for replacement playing fields is unnecessary and unjustified, and that the site would be more appropriately allocated for residential development. By extension it is also evident that the basis upon which this site was assessed within the SHELA (January 2020) under Site Ref: IP183, as being considered suitable, yet unavailable and unachievable, was fundamentally flawed.
- 1.9 A Masterplan (see Appendix 1) has been prepared by Tate Harmer Architects which illustrates how development of land west of Tuddenham Road could be developed for residential use, with scope to accommodate up to 500 dwellings, and therefore comparable in scale to the Ipswich Borough element of the proposed cross-boundary ISPA 4.1 allocation. This applies many of the key design principles of the neighbouring Garden Suburb (as defined within the allocations policy and subsequent SPD), including the following:
  - Comparable dwelling size mix covering a varied range of 1-5 bed new homes;
  - A series of interconnecting linear green parks and green avenues with integral sustainable urban drainage system (SUDS) also providing ecology benefits;
  - In excess of 12% public open space (allowing for incorporation of SUDS);
  - Scope for community space/buildings;
  - Average net residential density of 32 dph;
  - Vehicle-free streets, adopting Home Zones approach;

- Vehicular access shown indicatively as being taken from two points along Tuddenham Road;
  - Suitable green buffers adjacent to railway lines (to north and west), with notable width to the north, respecting "Green Trail" designation shown on Key Diagram.
- 1.10 In promoting the availability and suitability of the Tuddenham Road site to come forward for residential development it is considered that its allocation could be robustly contemplated under a number of scenarios.
- 1.11 Firstly, it would be a preferable, more suitable and more sustainable alternative to the proposed allocation sites that comprise ISPA4.1. It is evident that the site west of Tuddenham Road is more closely related to the Ipswich Garden Suburb and therefore able to take better advantage of community facilities planned as part of that development, and indeed to supplement these through provision of further facilities. In this regard it should be noted that direct pedestrian and cycle access can be achieved between these sites by virtue of existing connection beneath the intervening railway line from the north-western corner of our client's site, the nature of which could be significantly enhanced to provide an attractive and convenient route. The location of this connection would link particularly well to the location of both the Secondary School and Primary School within this area of the Ipswich Garden Suburb scheme, as shown in the Adopted SPD.
- 1.12 This is in stark contrast to the ISPA4.1 allocation which would inevitably lead to access to such facilities being dependent on car use, or pedestrians having to cross Tuddenham Road.
- 1.13 It is also apparent that the ISPA4.1 allocation does not comprise a single site, but rather a series of separate and disjointed parcels that will not ultimately form a comprehensive new community. Inclusion of the Ipswich Rugby Club land is also likely to lead to a need for re-provision of land for yet more compensatory pitches.
- 1.14 Secondly, as set out at Para. 1.4 above, there is an element of uncertainty regarding the viability of releasing land at Notcutts Field (allocated as part of the Ipswich Garden Suburb), given the need to finance alternative sports facility provision. In the event that the site off Valley Road were therefore unable to deliver housing, the Tuddenham Road site would provide an effective and suitable alternative housing allocation.
- 1.15 Thirdly the site would provide either a suitable additional or alternative site in the context of concerns about the deliverability of other sites relied upon in the Plan, or in the event that additional supply is required more generally.
- 1.16 In this regard it is considered that a significant number of site allocations have been in place for some considerable time, yet have not to date come forward for development. Analysis of the proposed allocation sites in the Draft Local Plan Review which contain a specified indicative residential capacity reveals that a significant number of sites have been allocated for comparable uses since the 1997 Local Plan was adopted, but to date have failed to be delivered (either in part or in their entirety). There are some 8 sites for which this situation is apparent, as listed at Appendix 2 of this statement. The collective capacity from these sites totals 865 dwellings.

- 1.17 It is not necessarily advocated that these sites be de-allocated, given that the principle of their development remains appropriate. Rather it is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period, noting that whilst a discount of 10% "slippage" has been applied to certain supply categories (sites with planning permission or resolution to grant) no such flexibility has been built in for allocation sites. This is further evident when regard is had to proposed allocation sites where explicit acknowledgement is given within the allocations schedule to the need for existing uses to be displaced and alternative sites found for these to be accommodated before development could proceed (sites IP003, IP011b, IP014, IP032, IP064a, IP066, IP119, IP120b).
- 1.18 Furthermore it is noted that within the Government's recently published Housing Delivery Test: 2019 Measurement data (13<sup>th</sup> February 2020) it was recorded that Ipswich Borough Council delivered 611 net additional dwellings over the preceding 3 year period against a requirement of 1,319 dwellings. This represents just 46%, and therefore only narrowly avoiding automatic application of the presumption in favour of sustainable development (which would have applied at anything below 45% for this current period). As a consequence the Borough are needing to apply a buffer of 20% to its 5 year housing land supply requirement.
- 1.19 It is not clear that this has currently been factored into the current land supply calculations, and indeed it is acknowledged that the above information was published after this consultation draft plan was prepared. This will however need to be rectified going forward, and whilst it is recognised that this need not necessarily affect the quantum of overall supply across the plan period, it does clearly require a focus on the identification of sites that are deliverable within the first 5 years. Regard will also need to be given to addressing the backlog in supply that has already arisen since the start of the plan period (77 dwellings during 2018/19, based on the stated 223 completions against the initial lower stepped requirement of 300 dwellings, with data related to 2019 performance awaited).

## **2. Specific Policy Comments and Proposed Alternatives**

- 2.1 In light of the comments set out above the following specific comments and objections are made on behalf of Ipswich School.

### **Core Strategy and Policies DPD -Diagram 3: The Ipswich Key Diagram and Para. 7.2 (iv)**

- 2.1.1 Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as "**Land Allocated for Sport Use**" on the basis that it is not required for this purpose.
- 2.1.2 The release of the Ipswich School land at Notcutts Field, as part of the allocated Ipswich Garden Suburb is not currently considered viable and is therefore uncertain, whilst in any event the school owns other land that would provide suitable alternative land for replacement

playing fields within the vicinity and has already invested significantly into new and improved facilities at its Rushmere St Andrew Sports Centre.

- 2.1.3 Instead it is proposed that the site is allocated for residential development (21.81ha, with capacity for 500 dwellings).

**Core Strategy and Policies DPD – Policy CS2: The location and nature of development**

- 2.1.4 Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), under CS2 (b), with suggested alternative reference to allocation of land off Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings).
- 2.1.5 This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.

**Core Strategy and Policies DPD – Policy CS7: The amount of new housing required**

- 2.1.6 Object to inclusion of land at the northern end of Humber Doucy Lane (ISPA4.1) within the land supply and replacement with reference to land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings).
- 2.1.7 Object to omission of any reference to the need for inclusion of a 20% buffer to the 5 Year Housing Land Supply, in light of latest Housing Delivery Test information (2019 Measurement, released February 2020); to the need to also address the emerging delivery shortfall in this regard (77 dwellings within the first year); and also the need for increased focus on identification of sites that are deliverable in the initial 5 year period.
- 2.1.8 It is also felt that the allocated sites component of housing supply should be increased on the basis that not all of the sites relied upon will be guaranteed to deliver within the Plan Period, having regard to the fact that a proportion of these have been allocated in the Local Plan since 1997 without having yet come forward, whilst others are reliant on the securing of alternative sites for relocation of existing uses in the first instance.

**Core Strategy and Policies DPD – Policy ISPA4: Cross boundary working to deliver sites**

- 2.1.9 Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), in the context of Policy ISPA4, with suggested alternative reference to allocation of land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings), albeit not necessarily therefore involving cross boundary working given containment within Ipswich Borough.

- 2.1.10 This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.

#### **Site Allocations and Policies DPD – Site Ref: ISPA 4.1**

- 2.1.11 Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), with suggested alternative allocation of land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings), albeit not necessarily therefore involving cross boundary working given containment within Ipswich Borough.
- 2.1.12 This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.

#### **Site Allocations and Policies DPD – Omission Site**

- 2.1.13 Object to omission of land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings) as a residential allocation.
- 2.1.14 This is on the basis that the site is not required for relocation of sport use and would represent a sustainable residential development opportunity, able to take advantage of close proximity to the Ipswich Garden Suburb development through direct pedestrian and cycle connection, reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.
- 2.1.15 The proposed site allocation could also offer additional flexibility of supply in light of concerns raised in our representations over the certainty with which allocated sites could be relied upon to deliver within the Plan Period.

#### **Proposals Map**

- 2.1.16 Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as "**Land Allocated for Sport Use**" on the basis that it is not required for this purpose.
- 2.1.17 The release of the Ipswich School land at Notcutts Field, as part of the allocated Ipswich Garden Suburb is not currently considered viable and is therefore uncertain, whilst in any event the school owns other land that would provide suitable alternative land for replacement playing fields within the vicinity and has already invested significantly into new and improved facilities at its Rushmere St Andrew Sports Centre.

2.1.18 Instead it is proposed that the site is allocated for residential development (21.81ha, with capacity for 500 dwellings).

**3. Summary**

3.1 Should you have any queries on the matters raised within these submissions please do not hesitate to contact me. Ipswich School would be more than happy to discuss the opportunities presented by their site off Tuddenham Road in further detail.

Yours faithfully

**Matt Clarke  
Director, Head of Boyer Colchester**

## APPENDIX 1 – MASTERPLAN DOCUMENT

Boyer



**Masterplan Proposal**  
**Tuddenham Road, Ipswich**

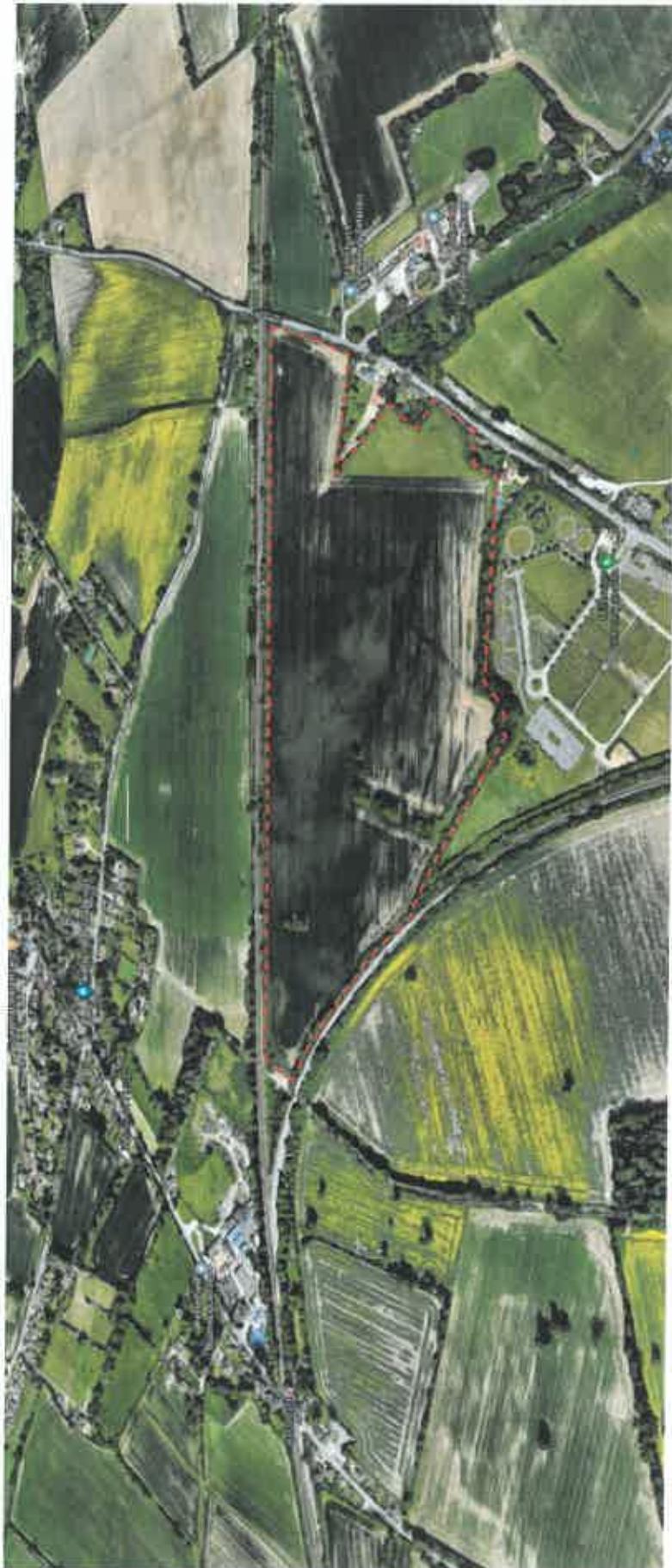
2nd March 2020

## 01 EXISTING SCHOOL LAND



Aerial view of existing school land

02 TUDDENHAM ROAD SITE



Aerial view of Tuddenham Road - red line denotes site boundary

### 03 EXISTING CONTEXT



Chelaworth Avenue - local example of green streets

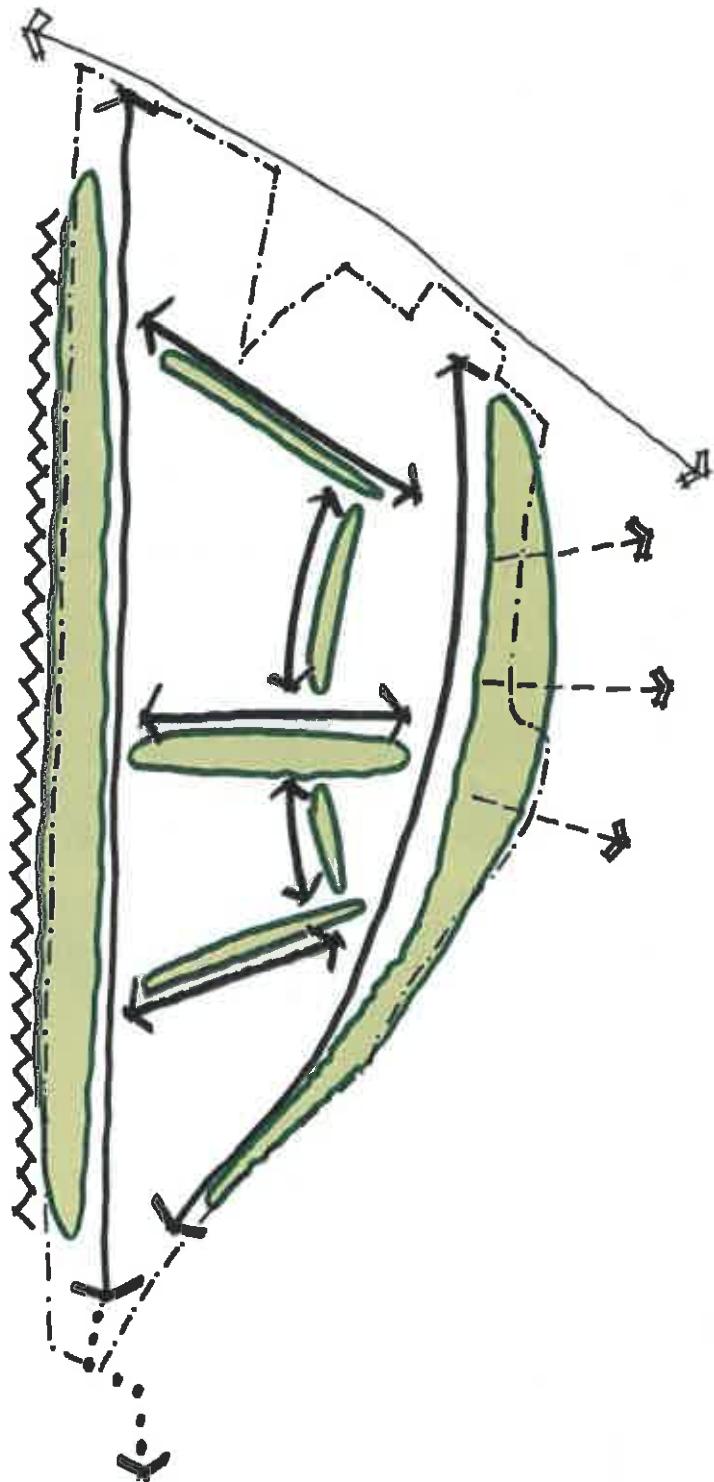


Local Wellness Clinic on Tuddenham Road



Local cottage house typology on Tuddenham Road





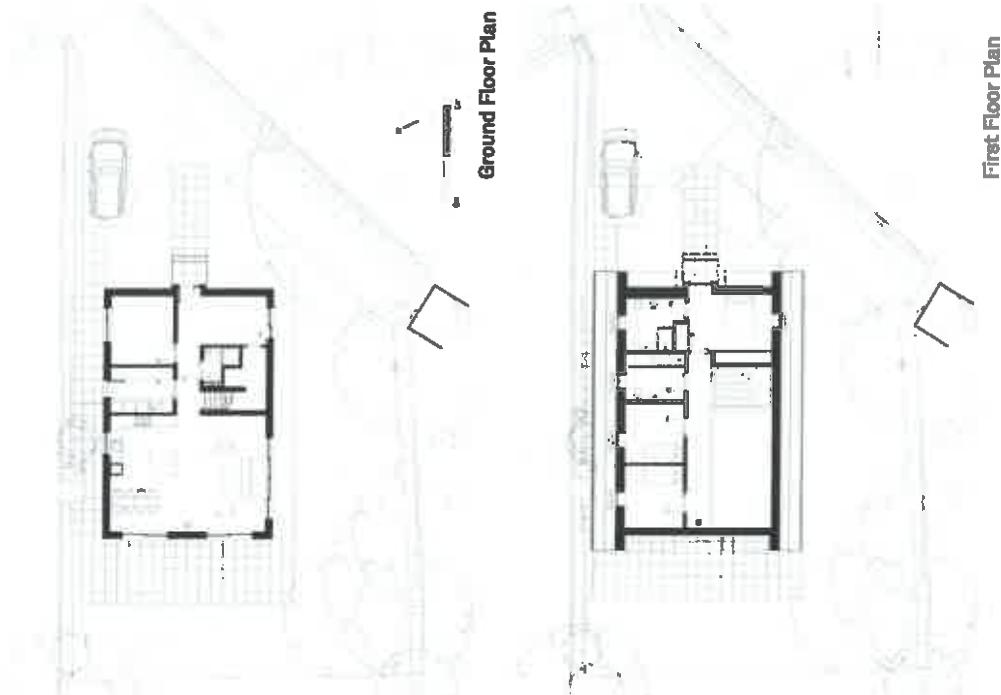
#### Primary Movement & Green Avenues

Large green buffer zones along the north and south boundary will create open public spaces with green avenues connecting across the site. A central linear park running north to south will act as a community spine to the masterplan, allowing for recreational activities and a link to a site wide sustainable urban drainage system. These green spaces will improve water conservation, the public's health and wellbeing, and the surrounding ecology.

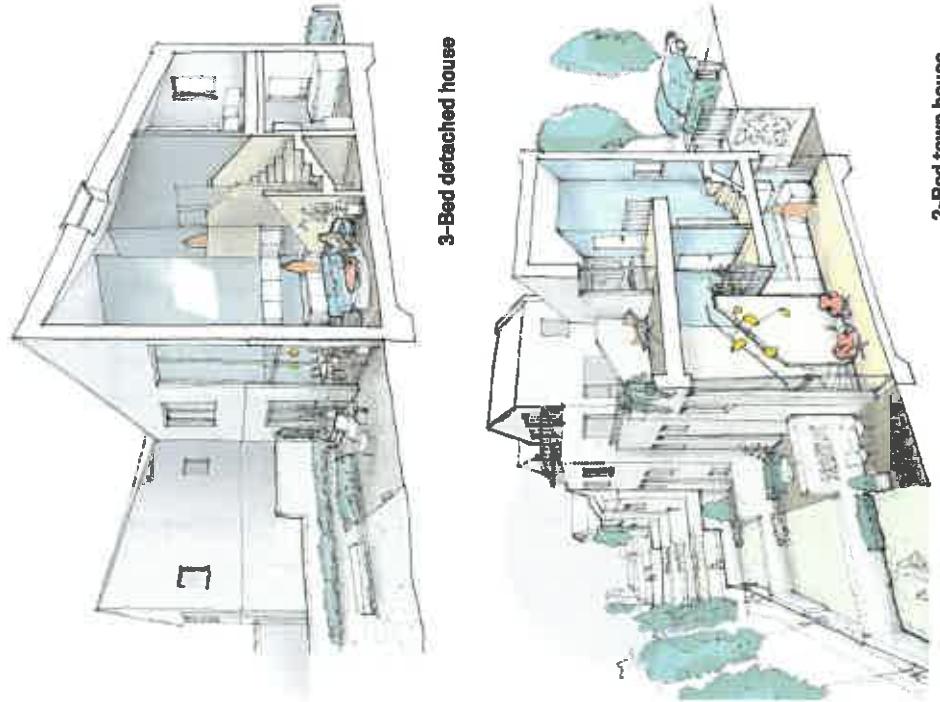
**Hoo House**  
Location: Suffolk, UK  
Size: 190sqm

This project is intended as a prototype for a low-cost, low-energy, new-build house which can sensitively respond to a market town setting. The project site had a planning restriction for a chalet bungalow and we responded to this by splitting the central ridge to provide more spacious rooms on the first floor.

We used a 'fabric first' approach to the building design, working with engineers, Euro Happold on the massing, orientation and glazing distribution to maximise passive solar gain in winter months. By arranging all of the cellular rooms into one half of the building we created a dramatic double height living area, with solar tubes bringing light deep into the heart of the building.



First Floor Plan



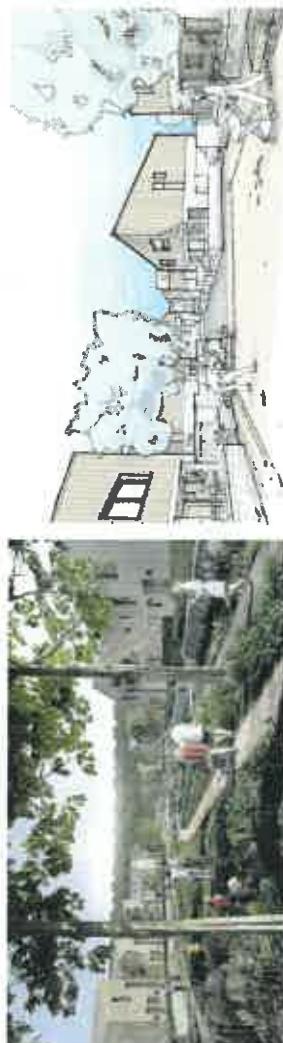
2-Bed town house

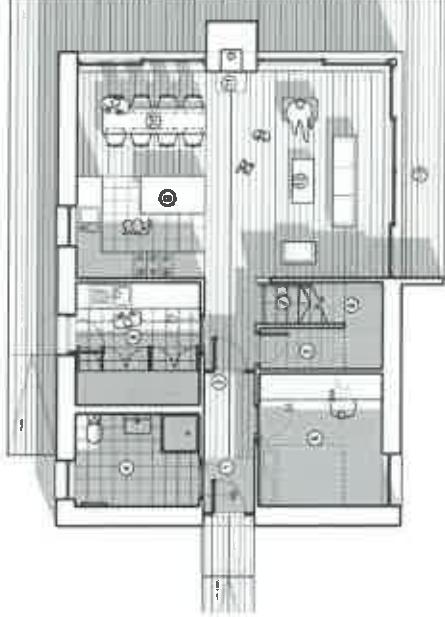
**Eshott Positive Living**  
Location: Yorkshire, UK  
Size: 20,000sqm (150 homes)

The scheme will create a ground-breaking sustainable residential and commercial development in place of existing disused water treatment tanks on the site.

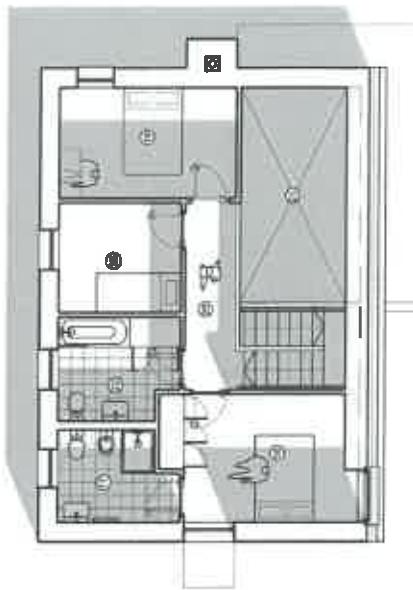
The housing has been led by a drive to create an exemplar residential development which will be one of the most sustainable in the UK. The masterplan outlines 150 homes, from 1-bedroom maisonettes to 5-bedroom detached houses to allow for a diverse community. All of the housing will be low energy construction, carefully orientated to maximise opportunities for passive solar gain in winter months as well as solar panels, all facing onto communal green landscaped areas.

When complete, this scheme will provide spaces for people to live, work and play, as well as a nationally recognised development for reaching high sustainability targets. It will repurpose the brownfield site to deliver a series of economic, social and environmental benefits through homes, open space and employment.





Ground Floor Plan



First Floor Plan

### Light House

**Location:** Dorset & Somerset, UK  
**Size:** 130sqm

We were commissioned by the Habitat First Group to design three and four bedroom new house types for the new Lower Mill Estate in Somerset. The design also features in their Silverlake, Dorset proposal. Both of these sites are a collection of elegant contemporary sustainable homes set in a bucolic setting.

Conceived as a building which is simple to understand, occupy and operate, the 'Light-House' is the first Habitat First Group design to meet Passivhaus standards and code level 6 of the old Code for Sustainable Homes. Based on a traditional housing typology, it is a compact but flexible and adaptable home. Large areas of south-facing triple-glazed windows provide natural day light deep into the house. High level automatic opening roof lights provide natural ventilation through a 'stack' effect, helping to purge the house when temperatures outside are high.

Overall, this design demonstrates that it is possible to live sustainably and beautifully without resorting to complicated methods or systems.



# TATE HAMMER

---

Unit G1B2 Stamford Works  
3 Gillett Street  
London  
N16 8JH

T: 020 7241 7481  
E: [studio@tatehammer.com](mailto:studio@tatehammer.com)

## **APPENDIX 2 – SITES ALLOCATED IN DRAFT LOCAL PLAN WHICH HAVE FAILED TO DELIVER DESPITE ALLOCATION SINCE 1997**

| <b>Site ref.</b> | <b>Site name and development description</b>                                                                                        | <b>Site size ha (% residential on mixed use sites)</b> | <b>Indicative capacity (homes)</b> | <b>Capacity evidence</b>                               | <b>Likely delivery timescale (S, M, L)</b> | <b>Our Comments</b>                                                                                                                                                                                                                   |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|------------------------------------|--------------------------------------------------------|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IP009            | Victoria Nurseries, Westerfield Road                                                                                                | 0.39                                                   | 12                                 | 30dph (DM23c) Low density to reflect suburban location | S                                          | Allocated in 1997 Local Plan as part of site ref. 6.8, despite which has remained undeveloped. Displacement of existing nursery use would be required.                                                                                |
| IP011c           | Smart Street, Foundation Street (North) Allocated for residential development Site IP011b has been split to reflect the ownerships. | 0.08                                                   | 7                                  | 90dph (DM23a lower end of range)                       | M                                          | Allocated in 1997 Local Plan as part of site ref. 5.8                                                                                                                                                                                 |
| IP012            | Peter's Ice Cream                                                                                                                   | 0.32                                                   | 35                                 | 110dph (DM23a higher end of range)                     | M                                          | Allocated in 1997 Local Plan as part of site ref. 5.11. Whilst parts of wider site have come forward, and signs of potential development have been apparent, it is noted that the site does not yet benefit from planning permission. |
| IP035            | Key Street / Star Lane / Burtons (St Peter's Port)                                                                                  | 0.54 (80%)                                             | 86                                 | DM23a at a higher density of around 200 dph            | M                                          | Allocated in 1997 Local Plan as site ref. 5.6. Site lies between two busy roads as part of one way network, which may form constraint.                                                                                                |
| IP037            | Island Site Allocated for housing and open space alongside existing Marina and small                                                | 6.02 (c. 70%)                                          | 421                                | 100dph (DM23a midrange)                                | L                                          | Allocated in 1997 Local Plan under site refs: 5.1 and 5.2.                                                                                                                                                                            |

|        |                                                                                                            |              |    |                                                                                                                                                                              |                                                                                                                                                                      |
|--------|------------------------------------------------------------------------------------------------------------|--------------|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|        | commercial uses to support enterprise zone.                                                                |              |    |                                                                                                                                                                              | The need for additional access arrangements is noted and may represent constraint.                                                                                   |
| IP054b | Land between Old Cattle Market and Star Lane                                                               | 1.08 (60%)   | 23 | 40dph (DM23 b-c)                                                                                                                                                             | Allocated in 1997 Local Plan as part of site refs: 5.9 and 5.10                                                                                                      |
| IP132  | Former St Peters Warehouse Site, 4 Bridge Street                                                           | 0.18         | 73 | 73 dwellings as part of a mixed use scheme (with B1a office use, leisure or small scale retail)                                                                              | Allocated in 1997 Local Plan as part of site ref: 5.3.<br>Lengthy vacancy with no signs of coming forward, despite allocation since 1997.                            |
| IP136  | Silo, College Street                                                                                       | 0.16 (c.80%) | 48 | Assume 6 flats per floor within 10 storey development with commercial on lower two floors (DM23a) and higher than average density consistent with other schemes along Quay). | Allocated in 1997 Local Plan as part of site ref: 5.3.<br>Fire damaged buildings and lengthy vacancy with no signs of coming forward, despite allocation since 1997. |
| IP150d | Land south of Ravenswood – Sports Park (part adjacent to Alnessbourn Crescent only – to be master planned) | 1.8          | 34 | DM23 c. low density as part of mixed use with sports park                                                                                                                    | Allocated in 1997 Local Plan as part of site ref: 6.1.<br>Remainder of Ravenswood community has been built out, but                                                  |

|        |                                                                                       |     |            |                                                                                                                                                        |
|--------|---------------------------------------------------------------------------------------|-----|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
|        |                                                                                       |     |            | several parcels remain undeveloped.                                                                                                                    |
| 1P150e | Land south of Ravenswood (excluding area fronting Nacton Road) – to be master planned | 3.6 | 126        | Allocated in 1997 Local Plan as part of site ref: 6.1<br>Remainder of Ravenswood community has been built out, but several parcels remain undeveloped. |
|        |                                                                                       |     | M          | DM23 c. low density as part of mixed use with B1 employment uses                                                                                       |
|        | <b>Total</b>                                                                          |     | <b>865</b> |                                                                                                                                                        |

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**J**



**From:** Jonathan .  
**Sent:** 11 February 2020 18:37  
**To:** PlanningPolicy  
**Subject:** Feedback on consultation, Site ref: IP150e  
**Attachments:** 5.\_updated\_21.01.20\_local\_plan\_final\_draft\_comments\_form\_ch.doc

We are generally supportive of a mixed tenure development on this site in line with the recent secretary of state's verdict that this be an appropriate ratio.

However, we cannot support development of any kind until IBC takes significant measures to improve the flow of traffic in the area.

Both short term solutions accounting for site traffic as well as long-term solutions for increased residency need to be put into effect.

The roundabouts at the entrance to Ravenswood are a significant bottle neck, causing dangerous congestion due to illegal manoeuvres by impatient drivers.

Traffic is regularly problematic at rush hour, but also at other hours due to the popularity of McDonald's.

Solutions might include additional entrances to the residential areas (with measures to prevent use as a cut through), additional entrances to Ravenswood retail park / McDonald's, additional lanes between roundabouts

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:

[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>Local Plan Review, Site Sheets Part 2</b><br><b>Site ref: IP150e (UC267) Land south of Ravenswood</b>                                                                                                                                            |
| <b>Please return this comments form to:</b>                          | <u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or<br><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                     |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><b>Part B – Your comment(s).</b>                                                                                                                                                                                |

| <b>PART A PERSONAL DETAILS</b>         |                            |                                           |
|----------------------------------------|----------------------------|-------------------------------------------|
|                                        | <b>1. Personal details</b> | <b>2. Agent's details (if applicable)</b> |
| Title                                  | N/A                        |                                           |
| First name                             | N/A                        |                                           |
| Last name                              | N/A                        |                                           |
| Job title ( <i>where relevant</i> )    | N/A                        |                                           |
| Organisation ( <i>where relevant</i> ) | N/A                        |                                           |
| Address<br>(Please include post code)  | IP3 9GT                    |                                           |
| E-mail                                 |                            |                                           |
| Telephone No.                          |                            |                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                             |          |
|-------------------------------------------------------------|----------|
| Your name or organisation (and client if you are an agent): | Jonathan |
|-------------------------------------------------------------|----------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.                                                                    | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Local Plan Review, Site Sheets Part 2<br><br>Site ref: IP150e<br>(UC267) Land south of Ravenswood | We are generally supportive of a mixed tenure development on this site in line with the recent secretary of state's verdict that this be an appropriate ratio.<br><br>However, we cannot support development of any kind until IBC takes significant measures to improve the flow of traffic in the area.<br><br>Both short term solutions accounting for site traffic as well as long-term solutions for increased residency need to be put into effect.<br><br>The roundabouts at the entrance to Ravenswood are a significant bottleneck, causing dangerous congestion due to illegal manoeuvres by impatient drivers.<br><br>Traffic is regularly problematic at rush hour, but also at other hours due to the popularity of McDonald's.<br><br>Solutions might include additional entrances to the residential areas (with measures to prevent use as a cut through), additional entrances to Ravenswood retail park / McDonald's, additional lanes between roundabouts. |
|                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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| <b>Document(s) and document part.</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|                                       |                                                                                                                     |

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

| Document(s) and document part | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |
|-------------------------------|--------------------------------------------------------------------------------------------------------------|
|                               |                                                                                                              |
|                               |                                                                                                              |
|                               |                                                                                                              |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

Yes

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

Yes

**Adoption of the Ipswich Local Plan Review.**

Yes

### PRIVACY NOTICE

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Felicia Blake**

(21)

**From:** James Little  
**Sent:** 11 February 2020 16:16  
**To:** PlanningPolicy  
**Subject:** SITE ALLOCATIONS AND POLICIES,(INCORPORATING,IP-ONE AREA ACTION PLAN),DEVELOPMENT PLAN DOCUMENT REVIEW –FINAL DRAFT  
**Attachments:** Consultation Comments Form.doc

Dear Sirs,

Please see attached Consultation Comments Form.

We have owned Airport Farm Kennels since 1997 and in discussion and correspondence with your Authority have always stated our formal objection to our land being considered for Park and Ride allocation. Whilst positive to see our land included in the latest Local Plan, our opinion has not changed.

Yours faithfully

James Little

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

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e-mail:

[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



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Planning and Development  
Ipswich Borough Council  
Grafton House  
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Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                            |
|----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | SITE ALLOCATIONS AND POLICIES (INCORPORATING IP-ONE AREA ACTION PLAN) DEVELOPMENT PLAN DOCUMENT REVIEW – FINAL DRAFT                                                                                                                       |
| <b>Please return this comments form to:</b>                          | <u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or<br><br>Planning Policy Team<br>Planning and Development<br>Ipswich Borough Council<br>Grafton House<br>15-17 Russell Road<br>Ipswich<br>IP1 2DE |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                            |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                   |

#### PART A PERSONAL DETAILS

|                                               | <b>1. Personal details</b>                    | <b>2. Agent's details (if applicable)</b> |
|-----------------------------------------------|-----------------------------------------------|-------------------------------------------|
| <b>Title</b>                                  | Mr                                            |                                           |
| <b>First name</b>                             | James                                         |                                           |
| <b>Last name</b>                              | Little                                        |                                           |
| <b>Job title (where relevant)</b>             |                                               |                                           |
| <b>Organisation (where relevant)</b>          | JPL Properties LLP                            |                                           |
| <b>Address<br/>(Please include post code)</b> | Priory Park<br>Ipswich<br>Suffolk<br>IP10 0JT |                                           |
| <b>E-mail</b>                                 |                                               |                                           |
| <b>Telephone No.</b>                          |                                               |                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                    |
|----------------------------------------------------------------------|--------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | JPL Properties LLP |
|----------------------------------------------------------------------|--------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.                                                                    | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                        |
|---------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| <b>Site Allocations and Policies<br/>Development Plan Document Review Final Draft. Site IP152</b> | <b>As owners of Airport Farm Kennels we continue to strongly object to our land being considered as a site for Park &amp; Ride.</b> |
|                                                                                                   |                                                                                                                                     |
|                                                                                                   |                                                                                                                                     |

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

| Document(s) and document part | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |
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|                               |                                                                                                              |
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|                               |                                                                                                              |

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Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

K



# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                                                             |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>Core Strategy and Policies Development Plan Document Review Final Draft</b><br><b>Site Allocations and Policies Development Plan Document Review Final Draft</b><br><b>Final Draft Local Plan Review Policies Map</b>                                                                    |
| <b>Please return this comments form to:</b>                          | <u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or<br><br><b>Planning Policy Team</b><br><b>Planning and Development</b><br><b>Ipswich Borough Council</b><br><b>Grafton House</b><br><b>15-17 Russell Road</b><br><b>Ipswich</b><br><b>IP1 2DE</b> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                                                             |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                                                                    |

| <b>PART A PERSONAL DETAILS</b>                |                                                                               |                                                                                              |
|-----------------------------------------------|-------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|
|                                               | <b>1. Personal details</b>                                                    | <b>2. Agent's details (if applicable)</b>                                                    |
| <b>Title</b>                                  |                                                                               | <b>Mrs</b>                                                                                   |
| <b>First name</b>                             |                                                                               | <b>Emma</b>                                                                                  |
| <b>Last name</b>                              |                                                                               | <b>Walker</b>                                                                                |
| <b>Job title (where relevant)</b>             |                                                                               | <b>Associate</b>                                                                             |
| <b>Organisation (where relevant)</b>          | <b>The Kesgrave Covenant Ltd</b>                                              | <b>Phase 2 Planning and Development Ltd</b>                                                  |
| <b>Address<br/>(Please include post code)</b> | <b>Philip House<br/>St William Court<br/>Kesgrave<br/>Suffolk<br/>IP5 2QP</b> | <b>270 Avenue West<br/>Skyline 120<br/>Great Notley<br/>Braintree<br/>Essex<br/>CM77 7AA</b> |

|               |  |  |
|---------------|--|--|
|               |  |  |
| E-mail        |  |  |
| Telephone No. |  |  |

## PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

|                                                                      |                                                                                            |
|----------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Emma Walker of Phase 2 Planning and Development Ltd on behalf of The Kesgrave Covenant Ltd |
|----------------------------------------------------------------------|--------------------------------------------------------------------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.                       | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                |
|------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Core Strategy and Policies DPD<br><br>Paragraph 6.17 | Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form. |
| Core Strategy and Policies DPD<br><br>Paragraph 7.2  | Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form. |
| Core Strategy and Policies DPD<br><br>Policy ISPA4   | Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this policy is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.    |
| Core Strategy and Policies DPD<br><br>Paragraph 8.28 | Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form. |

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b>                                                                                      | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                             |
|---------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Core Strategy and Policies DPD</b><br><b>Paragraph 8.29</b>                                                            | Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the ‘tests of soundness’. Further details on this matter are set out at the end of this form.     |
| <b>Core Strategy and Policies DPD</b><br><b>Policy CS2</b>                                                                | Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this policy is not justified or effective and therefore fails the ‘tests of soundness’. Further details on this matter are set out at the end of this form.        |
| <b>Core Strategy and Policies DPD</b><br><b>Paragraph 8.55</b>                                                            | Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the ‘tests of soundness’. Further details on this matter are set out at the end of this form.     |
| <b>Core Strategy and Policies DPD</b><br><b>Policy CS7</b>                                                                | Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this policy is not justified or effective and therefore fails the ‘tests of soundness’. Further details on this matter are set out at the end of this form.        |
| <b>Site Allocations and Policies DPD</b><br><b>Policy SP1 (and consequential amendments to table 1 and paragraph 4.7)</b> | Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, this site allocation should be included within the Site Allocations and Policies DPD. Further details on this matter are set out at the end of this form.                                 |
| <b>Policies Map</b><br><b>ISPA4</b>                                                                                       | Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording relating to this site is not justified or effective and therefore fails the ‘tests of soundness’. Further details on this matter are set out at the end of this form. |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council’s Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

## **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

## **PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Representations to the Local Plan Review – Final Draft  
Prepared by Phase 2 Planning and Development Ltd  
on behalf of The Kesgrave Covenant Ltd**

These detailed representations have been drafted in support of our representations in relation to the following policies, as summarised on the representation form:

**1. The Core Strategy and Policies Development Plan Document Review Final Draft:**

- **Paragraph 6.17**
- **Paragraph 7.2**
- **Policy ISPA4 – Cross Boundary Working to Deliver Sites**
- **Paragraph 8.28**
- **Paragraph 8.29**
- **Policy CS2 – The Location and Nature of Development**
- **Paragraph 8.55**
- **Policy CS7 – The Amount of New Housing Required**

**2. The Site Allocations and Policies Development Plan Document Review Final Draft:**

- **Policy SP2 (Omission of reference to land at Humber Doucy Lane)**

**3. Policies Map:**

- **ISPA4**

We would like to participate in the Local Plan Examination to enable the issues raised within these representations to be fully explored.

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Paragraph 6.17**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for "future" development for housing delivery and that it will be "appropriately phased" with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, its policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to "future" development or refer to the requirement for phasing without providing appropriate evidence and details.

#### **Proposed Amendment to the Plan**

Paragraph 6.17 should be amended to read:

"....A cross-border allocation for future development (within Ipswich Borough and Suffolk Coastal Local Plan area) for housing delivery, ~~appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure~~ is also identified in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road. ..."

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Paragraph 7.2**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the ‘tests of soundness’. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for “future” development for housing delivery and that it will be “appropriately phased” with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, its policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to “future” development or refer to the requirement for phasing without providing appropriate evidence and details.

#### **Proposed Amendment to the Plan**

Paragraph 7.2 should be amended to read:

“... (iv) The cross-border allocation for future development, ~~appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure~~ proposed at the northern end of Humber Doucy Lane through policy ISPA4; ...”

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Policy ISPA4: Cross Boundary Working to Deliver Sites**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that the development is viable and that there are no unnecessary delays to the delivery of development.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for "future" development for housing delivery and that it will be "appropriately phased" with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

The policy comments on the location of the green infrastructure. It should be noted that KCL has additional land in the vicinity of the allocation and therefore it may be possible to locate these uses outside the application site. We therefore seek flexibility to the wording of this policy to ensure that the most appropriate option can be pursued.

In addition, the policy sets out the requirements for affordable housing for the site. Whilst the provision of affordable housing on the site is supported in principle, the Council must ensure that targets set for sites are viable.

The draft Plan identifies that sites should provide at least 15% affordable housing, with the exception of land at Humber Doucy Lane and Ipswich Garden Suburb, which should provide at least 30% and 31% respectively. The assessment of affordable housing provision is set out in The Whole Plan Viability Study (January 2020). With regard to Humber Doucy Lane, the calculations (at Appendix 6 of the document) do not include Site Specific Section 106 Contributions or CIL, which leads us to query whether the full infrastructure costs of the development have been considered as part of the appraisal.

We are aware that the Whole Plan Viability Study has identified that Ipswich Garden Suburb development is viable with 31% affordable housing, yet the first two neighbourhoods have been subject to testing at the planning application stage, where it has been agreed that for viability reasons they can provide at least 4% and 5% respectively.

In light of the above, we would therefore suggest that further flexibility is applied to this policy to enable detailed viability assessment of the site.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, it's policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to "future" development or refer to the requirement for phasing without providing appropriate evidence and details. We recommend that the policy is amended to state that it will be subject to viability testing at the planning application stage, in accordance with policy CS12.

In addition, limiting the green infrastructure to the draft site allocation area is overly restrictive at this stage and does not enable the options to be fully explored. This approach is not the most effective and therefore does not comply with the tests of soundness.

#### **Proposed Amendment to the Plan**

Policy ISPA4 should be amended to read:

"Ipswich Borough Council will work with neighbouring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough but adjacent to the boundary, where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner. In order to meet housing needs within the Borough boundary as far as possible, the Council identifies a cross-border allocation for future development of 23.62ha of land within Ipswich Borough in 4 parcels forming ISPA4.1 for future housing growth and associated infrastructure improvements at the northern end of Humber Doucy Lane adjacent to Tuddenham Road. The allocation is shown on the accompanying site sheet for this policy. It will require land and infrastructure works and green infrastructure (including Suitable Accessible Natural Greenspace) on both sides of the Borough boundary in order to come forward, *however this could include land outside of the allocated site....*

*...Development will include at least 30% affordable housing, subject to viability testing at the planning application stage...."*

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Paragraph 8.28**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is not considered to be justified and therefore failing the ‘tests of soundness’. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development.

Paragraph 8.28 refers to transport mitigation measures required for the development of the site as being “challenging”. However, this is not considered to be the case. We re-iterate our earlier submissions in relation to the accessibility of the site and proposed transport measures below:

- The site benefits from good public transport accessibility. Humber Doucy Lane, which runs along the southern boundary of the site, is very well served by existing bus services from First Bus, Suffolk on Board and Ipswich Buses. Rail services at Westerfield Junction are easily accessible and around 2km from the site.
- The site also benefits from good road access and lies within approximately 1.5km of the A1214, which is part of the principal road network. The area is served by four existing radial routes, which give direct access to the A1214. There is good access to a number of distributor routes and no access issues.
- The site benefits from good accessibility to services and facilities with the nearest local centre located within walking distance (approximately 800 metres) with services including a convenience store, post office, hairdressers, bakers and public house and additional facilities proposed at the Ipswich Garden Suburb.
- Both Ipswich town centre and Heath Road Hospital are easily accessed by public transport from the site. The latter is a strategic health facility serving Ipswich and the surrounding area and is a major employer within the town.
- The development of this site promotes sustainable transport in accordance with paragraph 108 of the NPPF as:
  - It is located in a sustainable location, adjoining the existing built up area of Ipswich, with good access to facilities and services including good access by sustainable transports.
  - It is capable of providing safe and suitable access to the site for all users. The site can easily be accessed as the land parcels proposed for development have significant frontages onto Humber Doucy Lane.
  - As far as we are aware, SCC Highways have not expressed any objections to the proposal to allocate development in this area.

- A number of transport/highways mitigation measures will be considered as part of the proposals including upgrading of the junctions of Humber Doucy Lane /Tuddenham Road and Tuddenham Road/Church Road.
- The Local Plan Transport Modelling Report prepared by WSP concludes that Suffolk can accommodate the proposed housing growth with appropriate mitigation where necessary.
- The proposals will not influence the Ipswich northern bypass route. Even the inner-most option for the bypass indicates a route to the north of the railway line and therefore, the proposed development will have no impact on the proposed bypass or vice versa.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, it's the policies and supporting text relating to the proposed allocation at Humber Doucy Lane, the current reference to "challenging" transport mitigation measures are not justified.

#### **Proposed Amendment to the Plan**

Paragraph 8.28 should be amended to read:

"The site allocation at the northern end of Humber Doucy Lane is located at the edge of Ipswich approximately 3.5km from the town centre. Sustainable transport connections will be key to providing linkage to employment and other opportunities. In addition, it is acknowledged that the transport mitigation measures *are* required for the development of the site *are challenging* and it is essential that significant modal shift is delivered through strong travel plans and other sustainable measures."

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Paragraph 8.29**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking to query some of the detailed wording which unless clear and robust evidence can be provided is not considered to be justified or effective and therefore failing the ‘tests of soundness’. These representations therefore seek to retain the current allocation and whilst we support the affordable housing provision on site, we query whether the quantum of affordable housing has been robustly assessed.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development.

The draft Plan identifies that sites should provide at least 15% affordable housing, with the exception of land at Humber Doucy Lane and Ipswich Garden Suburb, which should provide at least 30% and 31% respectively. The assessment of affordable housing provision is set out in The Whole Plan Viability Study (January 2020). With regard to Humber Doucy Lane, the calculations (at Appendix 6 of the document) do not include Site Specific Section 106 Contributions or CIL, which leads us to query whether the full infrastructure costs of the development have been considered as part of the appraisal.

We are aware that whilst the Whole Plan Viability Study has identified that Ipswich Garden Suburb development is viable with 31% affordable housing, yet the first two neighbourhoods have been subject to testing at the planning application stage, where it has been agreed that they can provide at least 4% and 5% respectively.

In light of the above, we would therefore suggest that further flexibility is applied to this policy to enable detailed viability assessment of the site, if required.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, it’s the policies and supporting text relating to the proposed allocation at Humber Doucy Lane and the provision of affordable housing on the site, more detailed viability testing may be required to ensure that the site is viable having regard to all infrastructure costs.

#### **Proposed Amendment to the Plan**

Paragraph 8.29 should be amended to read:

“The Council will outline expected infrastructure provision of both green infrastructure and built infrastructure required as part of the joint agreed master-planning process to the cross-border Humber Doucy Lane sites. The Whole Plan Viability Assessment for the Local Plan identifies that this area of land falls within a high value zone and indicates that approximately 30% affordable housing could be achieved on a greenfield development, however this will be subject to further testing at the planning

*application stage. This level of affordable housing also broadly aligns with the Suffolk Coastal Local Plan affordable housing requirement of 33%.”*

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Policy CS2: The Location and Nature of Development**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

#### **Detail**

As Identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, referred to at policy CS2 and falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan Identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan Identifies that land at Humber Doucy Lane is allocated for "future" development for housing delivery and that it will be "appropriately phased" with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

The policy comments on the location of the green infrastructure. It should be noted that KCL has additional land in the vicinity of the allocation and therefore it may be possible to locate these uses outside the allocated site. We therefore seek flexibility to the wording of this policy to ensure that the most appropriate option can be pursued.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, it's the policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to "future" development or refer to the requirement for phasing without providing appropriate evidence and details.

In addition, limiting the green infrastructure to the application site is overly restrictive at this stage and does not enable the options to be fully explored. This approach is not the most effective and therefore does not comply with the tests of soundness.

#### **Proposed Amendment to the Plan**

##### **Policy CS2 should be amended to read:**

Representations to the Local Plan Review – Final Draft  
Phase 2 Planning and Development Ltd on behalf of The Kesgrave Covenant Ltd

**"b. Allocating sites for future development at the northern end of Humber Doucy Lane for housing and associated infrastructure, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, and working with East Suffolk Council to master plan development and ensure a comprehensive approach to its planning and delivery (see policy ISPA4)..."**

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Paragraph 8.55**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of supporting text to ensure that there are no unnecessary delays to the delivery of development.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, referred to at policy CS2 and falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane will come forward "as development draws to a conclusion at Ipswich Garden Suburb". The Plan should be amended to provide greater clarity with regard to the infrastructure that is required for delivery of dwellings at Humber Doucy Lane. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, it's the policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to the site coming forward "as development draws to a conclusion at Ipswich Garden Suburb" without providing appropriate evidence and details.

#### **Proposed Amendment to the Plan**

The final bullet point of paragraph 8.55 should be amended to read:

~~"As development draws to a conclusion at Ipswich Garden Suburb it will enable lower density housing development to be master planned jointly with East Suffolk Council at the northern end of Humber Doucy Lane, which will maintain and ensure separation between Ipswich and surrounding settlements."~~

**The Core Strategy and Policies Development Plan Document Review Final Draft**  
**Policy CS7**

**Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the ‘tests of soundness’. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

**Detail**

As Identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for “future” development for housing delivery and that it will be “appropriately phased” with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

**Legal Compliance/Soundness**

Although we generally support the Plan, it’s the policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to “appropriate phasing with the delivery of the Ipswich Garden Suburb and its associated infrastructure” development or refer to the requirement for phasing without providing appropriate evidence and details.

**Proposed Amendment to the Plan**

Policy CS7 should be amended to read:

~~“... c. ...Delivery will also take place at the northern end of Humber Doucy Lane, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure ...”~~

## **The Site Allocations and Policies Development Plan Document Final Draft**

### **Policy SP2: Land allocated for Housing (Omission of reference to land at Humber Doucy Lane within Table 1)**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 of the Core Strategy at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, reference should also be made to this allocation in the Site Allocations and Policies document for consistency. As currently drafted the Site Allocations and Policies DPD, by failing to include reference to this allocation, is neither justified nor effective and therefore fails the 'tests of soundness'. This representation therefore seeks to include reference to this site within the DPD.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site and are keen to work with both Councils to progress this development.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036) and yet it is not referenced within the Site Allocations and Policies DPD. For consistency consequential amendments should be made to reference this site allocation Table 1 and within paragraph 4.7.

#### **Legal Compliance/Soundness**

Although we support the inclusion of the allocation at Humber Doucy Lane within the Core Strategy document, it should also be included within the Site Allocations and Policies DPD. Its omission is neither justified nor effective.

#### **Proposed Amendment to the Plan**

An additional line should be provided within table 1 in relation to the allocation at Humber Doucy Lane:

| Site ref | Site name and development description | Site size ha (% residential on mixed sites) | Indicative capacity (homes) | Capacity evidence | Likely delivery timescale (S,M,L) |
|----------|---------------------------------------|---------------------------------------------|-----------------------------|-------------------|-----------------------------------|
| ISPA 4.1 | Northern End of Humber Doucy Lane     | 23.62ha (c. 50%)                            | 496                         | 35dph (DM23c)     | M/L                               |

For the sake of completeness, this table should also include reference to Ipswich Garden Suburb.

Paragraph 4.7 should be amended to reflect the proposed changes to table 1 with revised wording as follows:

"The Indicative capacity of the sites in table 1a listed in the policy above is 6,5142,759 dwellings. These will contribute to meeting the minimum housing requirement of 8,010 dwellings by 2036, as identified through Policy CS7 of the Final Draft Core Strategy. In addition, the Final Draft Core Strategy allocates land for the development of approximately 3,500 dwellings at Ipswich Garden Suburb (the Ipswich

Northern Fringe) through policy CS10, with delivery expected to start in 2019 and end in 2036. The Core Strategy Review also identifies a cross-border allocation for future development (within Ipswich Borough and Suffolk Coastal Local Plan area) for housing delivery, appropriately phased with delivery of the Ipswich Garden Suburb and its associated infrastructure at the northern end of Humber Doucy Lane adjacent to Tuddenham Road, through policy ISPA4."

## **Policies Map**

### **ISPA4 Land allocated for future housing growth and associated infrastructure improvements**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the ‘tests of soundness’. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text on the policies map to ensure that that there are no unnecessary delays to the delivery of development.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the Policies Map identifies that land at Humber Doucy Lane is allocated for “future” housing growth and “associated infrastructure improvements”. As identified elsewhere within our representations, the Plan should be amended to provide greater clarity with regard to the infrastructure that is required and with this clarity, there is no requirement to refer to “future” development.

The proposals will need to “provide on- and off- site infrastructure to support the development and mitigate the impact of the development on the existing community and environment” in accordance with draft policy CS17 (Delivering Infrastructure). It is not necessary for the Policies Map to refer to associated infrastructure improvements, since this provision is made under draft policy CS17 and these improvements are likely to be off-site as well as on-site. One example of off-site requirements are highways improvements.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, the Policies Map should not refer “future” development of the site, nor should it refer to infrastructure requirements. As currently drafted, it is neither justified nor effective and may cause unnecessary delay to delivery of development.

#### **Proposed Amendment to the Plan**

The Policies Map should be amended to read:

**“Land allocated for future housing growth & associated infrastructure improvements...ISPA4”**

## **Felicia Blake**

---

**From:**   
**Sent:** 23 January 2020 17:09  
**To:** PlanningPolicy  
**Subject:** Fwd: Site ref IP307 - Prince of Wales Drive

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

>  
>  
> Mr Frank King  
>  
>  
>  
> 23 January 2020  
>  
> Dear Sir  
>  
> I was appalled to read of this proposed development. It is totally unnecessary, poorly presented and I cannot believe that a good and reasonable Borough Council should even contemplate such a hideous scheme.  
> Prince of Wales Drive is in an open area and consists of bungalows and semi detached properties in accordance with Lord Belstead's wishes to the Borough planners just before 1968.  
> There is a Primary School and Elderly People's home opposite to the proposed development. The school has some onsite car parking, but visitors (and staff) to both premises make full usage of the car park that is within the proposed development area. It is a valuable and well used car park, bordered by some comparatively recently built houses with the residents making full use of this facility down to lack of parking. School staff and visitors also fill the lay-by outside the school or park along Prince of Wales Drive.  
> Prince of Wales Drive is an exceedingly busy through road for the 15, 15a and 16 bus services which frequently struggle to get a straight run due to parking along this road. Plus we have more than normal vehicle traffic especially for the School. The School itself has lorry deliveries most days along with buses ferrying children around. These have to stand on the road creating more inconvenience because there is nowhere else for them to unload, red cones are permanently on the road outside the school to facilitate this.  
> The School is at full student capacity and this causes parking problems along the road with cars parked across driveways and this also includes staff from the school. The parking problems are not confined to two half hour segments, but continue throughout the day and well into evenings with after school activities.  
> Sensibly there is a 20 mph speed limit which is rarely adhered to, but more traffic would be lethal.  
> The elderly people's home and the primary school were built to enjoy the open views down to the river. The proposed development would destroy this.  
> I feel so sorry for the residents of Aberdare Close and Chatsworth Crescent plus of course many of us living along this road, who bought their property because they liked the open plan feeling and enjoy such wondrous views. Aberdare Close was built only a few years ago with full use of the current car park.  
> There is a need for shops in the area which has an ageing population. The Co-op own the proposed development site which had a very successful ladies hairdressing salon as well as an excellent kitchen furniture suppliers, plus a Co-op grocery store. This store was successful until the Borough Council gave planning permission to build an ASDA store much further along the estate. The Co-op could have sold or let the property, and indeed received offers, but decided not to do this in order to force a change of use of land for the site.  
> There will always be a need for affordable housing but there are more available and more suitable sites around. The open space at the side of ASDA or the unused allotments at Maidenhead plus a virtually unused sports field at Bourne Vale.

> The proposed development is overcrowded and will blight a current area in which to live and which conformed with Borough Council's ideals.

> It is obvious that the proposed development within such a busy and established community is wrong and should be withdrawn in the name of common sense and justifiable reason.

>

> Yours faithfully

> Frank King (Mr)

>

> Sent from my iPad

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

L



**From:** Chloe Parmenter  
**Sent:** 02 March 2020 16:31  
**To:** PlanningPolicy  
**Cc:** Phil Harvey  
**Subject:** Ipswich Borough Council Local Plan Review Final Draft - Representations  
**Attachments:** 200302 IBC Reps Forms.pdf; 200302 FINAL IBC Local Plan Review Representations.pdf

**Importance:** High  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir / Madam,

Please find attached our representations to the Ipswich Borough Council Local Plan Review Final Draft (Regulation 19) Consultation in relation to Land North of Burrell Road, Ipswich.

A representation form has been completed indicating each part of the Local Plan upon which we have made representations. Full comments are then provided in relation to the relevant sections, paragraphs, and policies, in the accompanying submission document.

I would be grateful if you could please confirm receipt of our representations by return.

Kind regards,

Chloe

Chloe Parmenter BSc  
Planner Colchester

L [linkedin.com/boyer](https://linkedin.com/boyer)  
[Wboverplanning.co.uk](http://Wboverplanning.co.uk)  
A 15 De Grey Square, De Grey Road, Colchester, Essex, CO4 5YQ

Boyer



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To see our Standard Terms and Conditions of Contract please [click here](#).  
At Boyer we take your data privacy seriously view our [privacy notice](#).

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                               |                                                                                                                                                                                                                                            |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation document(s) to which this comments form relates: | <b>Core Strategy and Policies Development Plan Document Review Final;<br/>Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft</b>                                           |
| Please return this comments form to:                          | <u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or<br><br>Planning Policy Team<br>Planning and Development<br>Ipswich Borough Council<br>Grafton House<br>15-17 Russell Road<br>Ipswich<br>IP1 2DE |
| Return by:                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                            |
| This form has two parts:                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                   |

| <b>PART A PERSONAL DETAILS</b>         |                            |                                                                     |
|----------------------------------------|----------------------------|---------------------------------------------------------------------|
|                                        | <b>1. Personal details</b> | <b>2. Agent's details (if applicable)</b>                           |
| Title                                  |                            | Miss                                                                |
| First name                             |                            | Chloe                                                               |
| Last name                              |                            | Parmenter                                                           |
| Job title ( <i>where relevant</i> )    |                            | Planner                                                             |
| Organisation ( <i>where relevant</i> ) |                            | Boyer                                                               |
| Address<br>(Please include post code)  | c/o Agent                  | 15 De Grey Square<br>De Grey Road<br>Colchester<br>Essex<br>CO4 5YQ |
| E-mail                                 | c/o Agent                  |                                                                     |

|               |  |  |
|---------------|--|--|
| Telephone No. |  |  |
|---------------|--|--|

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                                      |
|----------------------------------------------------------------------|--------------------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Miss. Chloe Parmenter, Boyer (agent) |
|----------------------------------------------------------------------|--------------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.                                                                                         | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |
|------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| Core Strategy and Policies<br>Development Plan Document Review Final;                                                  | See attached submission document                                                                             |
| Site Allocations and Policies<br>(Incorporating IP- One Area Action Plan) Development Plan Document Review Final Draft | See attached submission document                                                                             |
|                                                                                                                        |                                                                                                              |
|                                                                                                                        |                                                                                                              |

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

**PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

# Land North of Burrell Road, Ipswich

Representations to the Ipswich Borough Council Local Plan Review  
(Reg 19 Final Draft)

Boyer

Report Control

Project: Land North of Burrell Road, Ipswich  
Client:  
Reference: 19.6058  
File Origin: Document  
Primary Author: CPw  
Checked By:

| Issue | Date       | Status | Checked By |
|-------|------------|--------|------------|
| 1     | 26.02.2020 | Draft  |            |
| 2     | 02.03.2020 | FINAL  |            |

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## **APPENDIX**

**Appendix One – Site Location Plan**

**Appendix Two – Site Location Plan (115 Burrell Road Only)**

# 1. IPSWICH BOROUGH COUNCIL LOCAL PLAN REVIEW

## Overview

- 1.1 These representations have been prepared by Boyer on behalf of our client in response to the Ipswich Local Plan Review Final Draft (Regulation 19).
- 1.2 These representations make specific reference to land to the north of Burrell Road, Ipswich (see attached Site Location Plan at Appendix One).
- 1.3 The eastern portion of the site (115 Burrell Road) is currently subject to a pre-application enquiry (see Site Location Plan at Appendix Two), however the wider site now encompasses land immediately to the west of this parcel (103 Burrell Road).
- 1.4 The site is being promoted for residential development, and these representations refer to specific policies and the development potential of this site.
- 1.5 These representations respond to the relevant policies. Particular consideration has been given to the tests of soundness required to be met as set out by Paragraph 35 of the National Planning Policy Framework (NPPF, 2019), including whether the Local Plan is:
  - a) Positively prepared;
  - b) Justified;
  - c) Effective; and
  - d) Consistent with national policy.
- 1.6 Our comments reflect the chronological order of the sections and policies within the consultation document, and our representations are set out below.

## Core Strategy and Policies Development Plan Document Review Final Draft

### Part A: The Context

#### **Chapter 4: The Duty to Co-operate**

- 1.7 It would appear that the Council has sought to co-operate with the neighbouring authorities and statutory bodies on the key strategic and cross boundary issues. This is welcomed, and we consider that this is important given the tightly drawn administrative boundary, which constrains the practical options for meeting needs for development within the Borough.

#### **Chapter 5: Ipswich – The Place**

- 1.8 We agree that within Ipswich, there is an ongoing need for regeneration to address pockets of deprivation in some of the disadvantaged and physically more run down areas of the town.

- 1.9 We also support the focus on the Ipswich Waterfront as an area for regeneration creating space for a vibrant new cultural, residential, business and leisure area, complementing the existing marina facilities
- 1.10 Land to the north of Burrell Road lies along the River Orwell, and currently comprises a Sui Generis use. The proposed development would contribute to the regeneration of Burrell Road, and the wider IP-One Area, whilst also contributing to the attractiveness of the Waterfront, thereby meeting the Council's overarching focus of creating space for a vibrant new cultural, residential, business and leisure area, complementing the existing marina facilities.
- 1.11 It is welcomed that Ipswich Borough Council (IBC) are using regeneration opportunities to address deprivation, make places safer and create opportunities for all.
- 1.12 Land to the north of Burrell Road should therefore be considered as an appropriate location for residential development, which would accord with National and Local Policy in this regard.
- 1.13 It is noted from Table 2 that there is a need across Ipswich and East Suffolk to ensure the delivery of a sustainable supply of housing, with the Ipswich-specific issues being the limited availability of land, and large areas of protected land.
- 1.14 It is strongly recommended that the Council should be seeking to allocate additional residential sites to meet this unmet housing need within the Borough. Land north of Burrell Road is a suitable, available and deliverable site and should be allocated for residential development.

#### **Part B: The Strategy**

##### **Chapter 6: Vision and Objectives**

- 1.15 We support the objective for housing set out in Paragraph 6.8 (2.), which states "*at least (a) 8,010 new dwellings shall be provided to meet the needs of Ipswich within the Housing Market Area between 2018 and 2036 in a manner that addresses identified local housing needs and provides a decent home for everyone.*"
- 1.16 We also agree with Point 4. that development will be directed to the central Ipswich IP-One area.
- 1.17 It is noted that the spatial approach to delivering sustainable growth in Ipswich seeks to, inter-alia:

- Make the most effective use of previously developed land;
  - Place new residents in close proximity to jobs, services, facilities and public transport nodes;
  - Regenerates some of the more deprived areas surrounding the historic core and addresses social needs by tackling issues of social and economic deprivation.
- 1.18 We also recognise that, in terms of a sequential test to development as required by the NPPF, as well as the need for urban regeneration in central Ipswich, there is no realistic alternative to locating some development in Flood Zone 3.
- 1.19 Land north of Burrell Road is located in proximity to the Waterfront and its facilities and services. Its proposed regeneration would contribute to the regeneration of Burrell Road, and the wider IP-One Area, whilst also contributing to the attractiveness of the Waterfront.

#### **Chapter 7: The Key Diagram**

- 1.20 The location of the IP-One area in Diagram 3 is supported, however it is considered that the extent of the Waterfront and the proposed location for major housing development could be extended westwards, especially in light of proposed allocations IP031a and IP031b for residential development.
- 1.21 In doing so, this would incorporate the site to the north of Burrell Road, which is a suitable, available and deliverable site which is capable of accommodating residential development to meet the unmet need within the Borough. The site should therefore be allocated for residential development.

#### **Chapter 8: The Spatial Strategy**

- 1.22 It is welcomed that the housing need for Babergh, Mid Suffolk and the wider Ipswich Housing Market Area is based on the NPPF standard methodology.
- 1.23 We do however note that there does appear to be some discrepancy in the housing need figures agreed across the Housing Market Area (HMA), as set out in the table below. It is understood the Ipswich Strategic Planning Area (IPSA) agreed a Statement of Common Ground 2020, and a copy of this is available on the IBC website signed January 2020.

*Table 1: Ipswich Housing Market Area*

|             | East Suffolk Council Local Plan Final Draft | Statement of Common Ground December 2018 | Statement of Common Ground March 2020<br>IBC Local Plan Review |
|-------------|---------------------------------------------|------------------------------------------|----------------------------------------------------------------|
| Babergh     | 7,560                                       | 7,560                                    | 7,560                                                          |
| Mid Suffolk | 10,620                                      | 10,530                                   | 10,008                                                         |
| Ipswich     | 8,822                                       | 8,010                                    | 8,010                                                          |

|                 |        |        |        |
|-----------------|--------|--------|--------|
| Suffolk Coastal | 10,476 | 9,270  | 9,756  |
| HMA             | 32,278 | 35,370 | 35,334 |

- 1.24 It appears that the East Suffolk Final Draft Local Plan relies on the standard methodology based on the 2016 household projections, whereas the IBC Local Plan Review focusses on the 2014 household projections, thus reducing their housing need figure.
- 1.25 Without further clarification with regards to the discrepancies between these projections, it is unclear whether the Council's emerging Local Plan meets the tests of soundness, as outlined in Paragraph 35 of the NPPF.

#### **Policy CS2: The Location and Nature of Development**

- 1.26 We support that Policy CS2 seeks to achieve regeneration and sustainable growth through, inter-alia:
  - Focusing new residential development and community facilities into the town centre, the Waterfront, Portman Quarter (formerly Ipswich Village), and Ipswich Garden Suburb and into or within walking distance of the town's district centres, and supporting community development; and
  - Directing other employment uses (B1 (except office), B2 and B8) to employment areas distributed in the outer parts of the Borough, with a 'town centre first' approach to the location of offices.
- 1.27 We also agree that the town centre, Portman Quarter and Waterfront will receive the highest densities of development, including high-density housing developments, with medium-density and locally focused facilities to be provided elsewhere in IP-One and within and around district centres, with lower density development elsewhere. It is recognised that this approach will: maximise opportunities to re-use previously developed land within central Ipswich; ensure that new housing is provided close to local shops, facilities and transport nodes; and support the ongoing regeneration of central Ipswich and particularly of the Waterfront and town centre.
- 1.28 Land north of Burrell Road offers an opportunity to meet Policy CS2 by accommodating residential development which would contribute towards meeting the needs for development within the Borough in a sustainable location, which is in close proximity to local services and facilities and transport nodes, including the train station.

#### **Policy CS3: IP-One Area Action Plan**

- 1.29 We support the production of the IP-One Area Action Plan incorporated in the Site Allocations and Policies Development Plan Document, to plan for significant change in central Ipswich and help to deliver the Ipswich Vision.

- 1.30 It is recognised that the purpose of the Action Plan is to allocate sites for development in IP-One and define the extent of the Waterfront and the Portman Quarter. However, we are concerned that the Action Plan does not make the most of allocating previously developed land for residential development. It is therefore considered that, at this stage, the emerging Local Plan does not meet the tests of soundness in terms of ensuring the consistent delivery of housing in accordance with Paragraph 35 of the NPPF.
- 1.31 It is considered that a greater number of short to medium scale sites should be allocated to ensure the consistent delivery of housing within the Borough. Land to the north of Burrell Road offers an opportunity to accommodate a degree of residential development in the short to medium term. The site is deliverable over the Plan period, and would provide an opportunity to enable the delivery of sustainable development in accordance with National Planning Policy. This is set out in further detail in section 2 of this document.

#### **Policy CS7: The Amount of Housing Required**

- 1.32 The Council state a housing requirement figure of at least 8,010 dwellings for the period 2018 – 2036. It is noted that Policy CS7 states that IBC will keep the housing figure under review and consider any implications for meeting Ipswich's Housing Need within the Ipswich Housing Market Area.
- 1.33 It is also noted that IBC have prepared a Draft Housing Delivery Action Plan as a result of the housing Delivery Test Figures (published in February 2020) identify that IBC only delivered 66% of their identified need over the period of 2015-2018. This resulted in the requirement for an Action Plan together with a 20% buffer of additional land to deliver housing.
- 1.34 The most recent Housing Delivery Test identifies that IBC were only able to deliver 46% of the identified need for homes for the period of 2016-2019, thus asserting the requirement for a 20% buffer of additional land to deliver housing. Therefore, the situation remains unchanged.
- 1.35 It is concerning that whilst paragraph 8.108 of the draft Core Strategy acknowledges that policies should include identification of a supply of specific, deliverable sites for years 1-5 from adoption with an appropriate buffer, and specific, developable sites or broad locations for growth for years 6-10, but does not make reference to the requirement for a 20% buffer as a result of the Housing Delivery Test.
- 1.36 Whilst it is noted that the Housing Delivery Test figures are fluid, in light of the Council's historic poor housing delivery, a greater number of short and medium-scale developments should be allocated to ensure the consistent delivery of housing in accordance with the National Planning Policy Framework.
- 1.37 Land at Burrell Road offers an opportunity to deliver a sustainable development that would regenerate this part of Ipswich, contributing to the regeneration of Burrell Road and the wider IP-One Area, whilst also contributing to the attractiveness of the Waterfront, which is at the forefront of local policy.

- 1.38 The Draft Housing Delivery Action Plan sets out various actions, and we agree that IBC should enhance the potential role of small and medium sized house builders. It is noted that the Action Plan also states that the Council will seek to support the creation of developer consortiums where an appetite exists. Our client would be willing to explore this opportunity, and this is exemplified through the current purchase of the neighbouring site.
- 1.39 Policy CS7 states that the Council will allocate land to provide for at least 6,100 dwellings (net) in the Borough, and expect that 700 dwellings will be delivered on small windfall sites between 2022 and 2036 at a rate of 50 dwellings per annum. However, it is of concern that the Authority Monitoring Report (June 2019) identifies that 47 dwellings were delivered through windfall sites in the 2017-18 monitoring period.
- 1.40 Development of the site to the north of Burrell Road would contribute to the delivery of windfall sites across the Borough.
- 1.41 We support the commitment for 100% of dwellings to be delivered on previously developed land in the IP-One area.

#### **Policy DM25: Protection of Employment Land**

- 1.42 We support that outside of defined Employment Areas, the conversion, change of use or redevelopment of sites and premises in employment use to non-employment uses will be permitted where:
  - c. There is no reasonable prospect of the site being re-used for employment purposes over the plan period; or
  - d. the proposed use is residential and it can be acceptably accommodated, would make more effective use of the site and would not harm the economic development strategy of the plan; and
  - e. in relation to c. and d., the proposed use is compatible with the surrounding uses and is an appropriate use for the site.
- 1.43 Land at Burrell Road is located outside of defined Employment Areas, and it is considered that the redevelopment of the site to residential use would be a more effective use of land in accordance with Paragraph 117 of the NPPF. Allocation of the site for residential development would improve the soundness of the plan by ensuring the consistent delivery of housing, in accordance with the National Planning Policy Framework.
- 1.44 The proposed development is also compatible with the surrounding uses which comprise predominantly residential uses. The site should therefore be included as an allocation for residential development.

**Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan  
Document Review – Final Draft**

**Part A: The Context**

**Chapter 2: The Ipswich Local Plan**

- 1.45 We support the location of the IP-One Boundary as illustrated in Figure 1.
- 1.46 We also agree with the identification of strategic issues to be addressed, including allocating sufficient land to meet objectively assessed housing need in accordance with the National Planning Policy Framework.

**Part B: The Policies**

**Policy SP2 Land Allocated for Housing**

- 1.47 We support the allocation of sites for residential development. However, it is our view that our client's site should be considered for residential development in the IP-One Area. The site is adjacent to proposed allocation IP031a, and would make a logical extension to this. It is therefore considered that, at this stage, the emerging Local Plan does not meet the tests of soundness in terms of ensuring the consistent delivery of housing in accordance with National Planning Policy.

**Policy SP11 The Waterfront**

- 1.48 It is noted that the Waterfront will contain a mix of uses including residential, community, office, arts, culture, open space, boat-related and tourism.
- 1.49 It is however considered that the Waterfront area should be extended westwards to encompass the site to the north of Burrell Road, which provides an opportunity for regeneration of the site to a residential use, which is compatible with this Policy. This would comply with Paragraph 5.22 which states that Policy CS2 focuses on residential and community facility development within the Waterfront in order to support the regeneration and sustainable growth of Ipswich, and mixed use development within the town centre.
- 1.50 In doing so, this would incorporate the site to the north of Burrell Road, which is a suitable, available and deliverable site which is capable of accommodating residential development to meet the unmet need within the Borough. The site should therefore be allocated for residential development.

## 2. LAND TO THE NORTH OF BURRELL ROAD, IPSWICH

### Introduction

- 2.1 Our client is actively seeking to promote the site to the north of Burrell Road, Ipswich, for residential development.
- 2.2 The land being promoted is approximately 0.3ha and comprises of a storage/distribution and sales base for Silverton Aggregates Ltd, who are seeking to relocate to a larger location within the Borough; and Eastern Counties Pumps Ltd who are also looking to relocate.
- 2.3 The site abuts the River Orwell along its northern edge, and is separated from the river by a flood barrier. To the east of the site lies a car park (proposed allocation IP031a), and residential development beyond this. Residential properties also extend to the west towards the train station, which is located 0.2 miles away from the site. Existing linear residential development is also situated on the opposite side of Burrell Road.
- 2.4 The site is located within the IP-One Area of Ipswich, where residential development is supported.
- 2.5 The site is also well located in terms of strategic road networks, including the A14 (approximately 2.7 miles away) and the A12 (approximately 3.2 miles away). These road networks connect the site to Cambridge and Bury St Edmunds, and Colchester respectively.
- 2.6 The site lies entirely within Flood Zone 3, but benefits from defences which protect the site from fluvial flooding from the River Orwell, as well as additional flood defences in the wider locality. The site also benefits from the recently opened tidal flood defence barrier.
- 2.7 The nearest heritage assets are located to the south, and include Church of St Mary at Stoke (Grade I Listed); part of the warehouses at the former Stoke Hall (Grade II Listed); and Lonsdale Cottage (Grade II Listed). These heritage assets are separated from the site by Burrell Road. Grade II Listed Glipping House is located to the east on the opposite side of Bridge Street, and further listed buildings lie to the north of the River Orwell.
- 2.8 The surrounding area accommodates a range of uses, including employment, residential and car parking. However, the site as existing is the only industrial/commercial site along Burrell Road, and the development of the site would contribute to the regeneration of the area, contributing to sustainable development and ensuring consistent delivery of housing, in accordance with the National Planning Policy Framework.
- 2.9 Silverton Aggregates are seeking to relocate to a larger premises within the Borough to allow for the required expansion and growth of the business, together with better suitability in relation to HGV and trades vehicle access. The proposed development of the site would therefore make a more effective use of land, in accordance with Paragraph 117 of the NPPF and Policy DM25.
- 2.10 Eastern Counties Pumps Ltd are also looking to vacate the site.

### **Proposed Development**

- 2.11 The inclusion of the site to the north of Burrell Road in the Local Plan Review would have a number of positive benefits, including the provision of much needed housing in the Borough in accordance with the NPPF.
- 2.12 In addition, it is considered that the development of the site would contribute to the regeneration of Burrell Road, and the wider IP-One Area, whilst also contributing to the attractiveness of the Waterfront, thereby meeting the Council's overarching focus of creating space for a vibrant new cultural, residential, business and leisure area, complementing the existing marina facilities.
- 2.13 The site is considered to be capable of accommodating residential development in the short to medium term. The current pre-application enquiry concerns only the Silverton Aggregates site, which is considered capable of accommodating 34 No. two bedroom apartments.
- 2.14 The proposed development complies with Policy DM25 which permits the change of use or redevelopment of employment sites outside of defined Employment Areas where: residential development can be acceptably accommodated; would make more effective use of the site; would not harm the economic development strategy of the plan; and is compatible with the surrounding uses and is an appropriate use for the site.

### ***Relocation of the Existing Business***

- 2.15 Silverton Aggregates Ltd are currently seeking relocation to a larger and more suitable premises which can accommodate the expansion of the business. This expansion is anticipated to take place within the Borough of Ipswich, creating additional employment opportunities for the local population. Eastern Counties Pumps Ltd are also looking to vacate the site.
- 2.16 The site as existing currently constrains the expansion of the business as it places physical and operational restrictions on its proposed future growth. For example, the access arrangements are not suitable for the increase in volume and size of vehicles related to the business.
- 2.17 Moreover, the existing buildings are of poor construction and energy efficiency, and are therefore not particularly suited to the needs of modern business.
- 2.18 The proposed development therefore complies with Policy DM25 which permits the change of use or redevelopment of employment sites outside of defined Employment Areas where: residential development can be acceptably accommodated; would make more effective use of the site; would not harm the economic development strategy of the plan; and is compatible with the surrounding uses and is an appropriate use for the site. The allocation of the site to the north of Burrell Road would ensure consistent delivery of sustainable development in accordance with National Planning Policy.

*Land Ownership and Deliverability*

- 2.19 The western portion of the site (115 Burrell Road) is under single ownership. Our client is also in the final stages of purchasing the western section (103 Burrell Road).
- 2.20 It is considered that this significantly de-risks the deliverability of the site as there will be no third parties involved in the site promotion and its delay to come forward as a future planning application.
- 2.21 It is considered that this should be given considerable weight when assessing this site for allocation within the Local Plan as the site is deliverable over the plan period.
- 2.22 Land north of Burrell Road is a suitable, available and deliverable site and should be allocated for residential development.

*Highways and Access*

- 2.23 Access to the site is gained off Burrell Road.
- 2.24 Suitable accesses to the site, and any required highway improvements, would be agreed with officers from Suffolk County Council Highways, and this should be possible

*Flooding and Drainage*

- 2.25 The site lies entirely within Flood Zone 3, but benefits from defences which protect the site from fluvial flooding from the River Orwell, as well as additional flood defences in the wider locality. The site also benefits from the recently opened tidal flood defence barrier.
- 2.26 A full Flood Risk Assessment would be submitted as part of any future application on the site, and any development would look to mitigate against the implications of its location within Flood Zone 3, which would be informed by engagement with the Council and the Lead Local Flood Authority (LLFA).

**Proposed Mechanism for Delivery**

*Site Promotion*

- 2.27 We would welcome your consideration of the potential to bring this site forward for residential development as part of the Local Plan.
- 2.28 Alternatively, it is our view that the site represents an opportunity for windfall development, which would contribute to much needed housing stock in the Borough.

*Engagement*

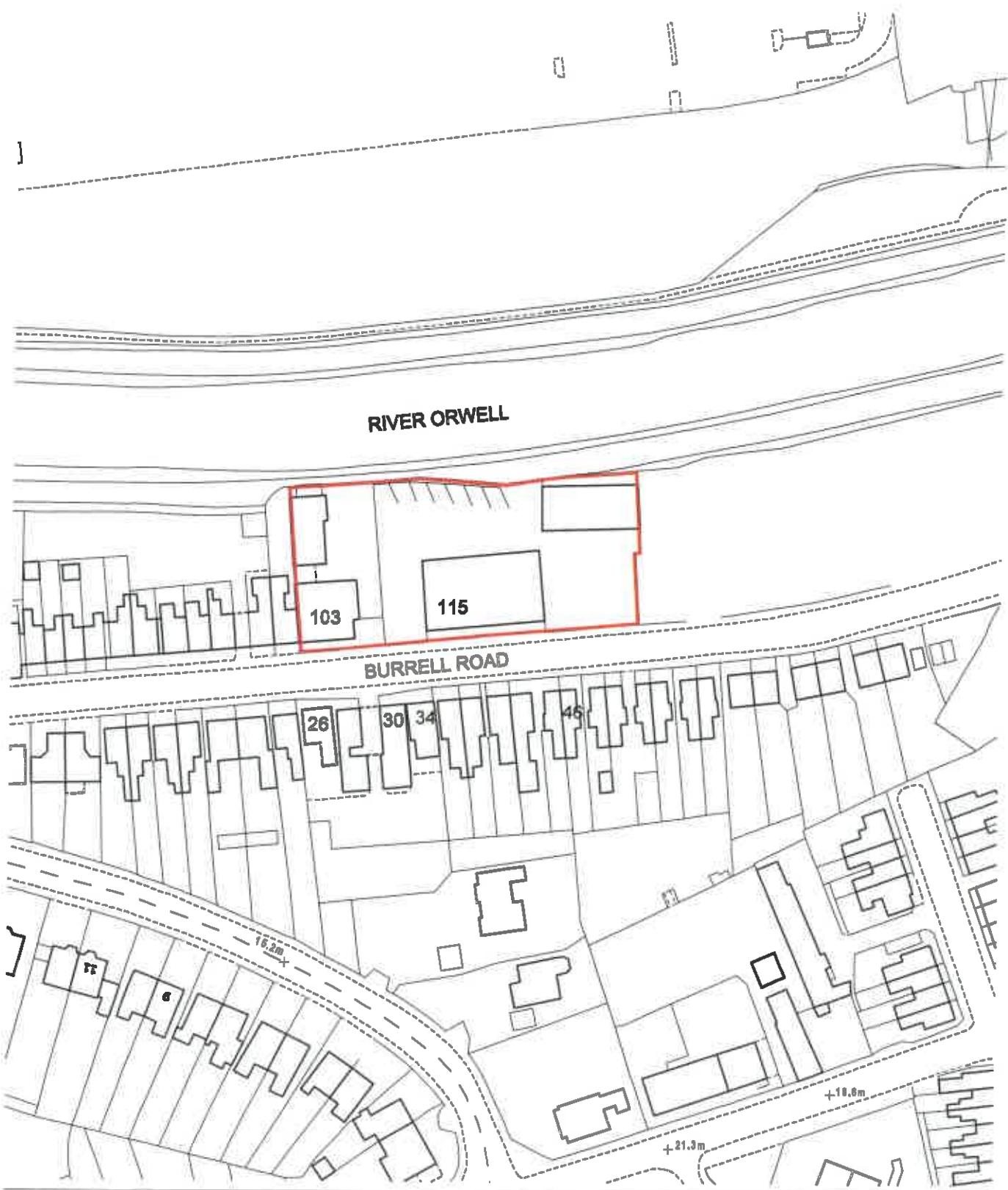
- 2.29 The client has already commenced the engagement process through the pre-application enquiry currently submitted which relates to the reduced area of the site.
- 2.30 Our client will also seek to engage with key stakeholders, and the local community to obtain their feedback and inform the proposals for the site.

## Summary

- 2.31 In the consideration of the inclusion of the site in the Local Plan, suitable weight should be afforded to the contribution that the delivery of development would make to the housing land supply across the Borough. This would
- 2.32 The development proposal would contribute to the supply of homes across the Borough, and represents a sustainable use in this area, which would not be out of character when considering the existing surrounding uses. The site represents a logical extension to the proposed residential allocations IP031a and IP031b.
- 2.33 The site is in a highly sustainable location in relation to its proximity to the train station and local services and facilities.
- 2.34 The development would assist in the regeneration of the area, providing a positive impact and uplift to the locality.
- 2.35 The site is also entirely previously developed land, and thus its development would comply with local and national policy in sustainability terms.
- 2.36 Allocation of land to the north of Burrell Road for residential development would make more effective use of the brownfield site, in accordance with Paragraph 117 of the NPPF.
- 2.37 Residential development of the site also accords with Policy DM25 which permits the change of use or redevelopment of sites from employment to residential use provided that the proposed development would make more effective use of the site and is compatible with the surrounding uses.
- 2.38 It is considered that a greater number of short to medium scale sites should be allocated to ensure the consistent delivery of housing within the Borough. Land to the north of Burrell Road offers an opportunity to provide a degree of residential development in the short to medium term. The site is deliverable over the Plan period, and would provide an opportunity to enable the delivery of sustainable development in accordance with National Planning Policy. This is set out in further detail in section 2 of this document.
- 2.39 Land to the north of Burrell Road is a suitable, available and deliverable site and should be allocated for residential development.



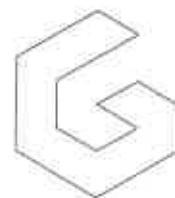
## **APPENDIX ONE – SITE LOCATION PLAN**



Project: Residential development  
Address: 103 and 115 Burrell Rd, Ipswich IP2 8AE  
Drawing: Site identification plan  
Client: FGH Ltd  
Drawn / checked: AJ / MB  
Drawing no / Rev: 0681\_A\_CD\_05

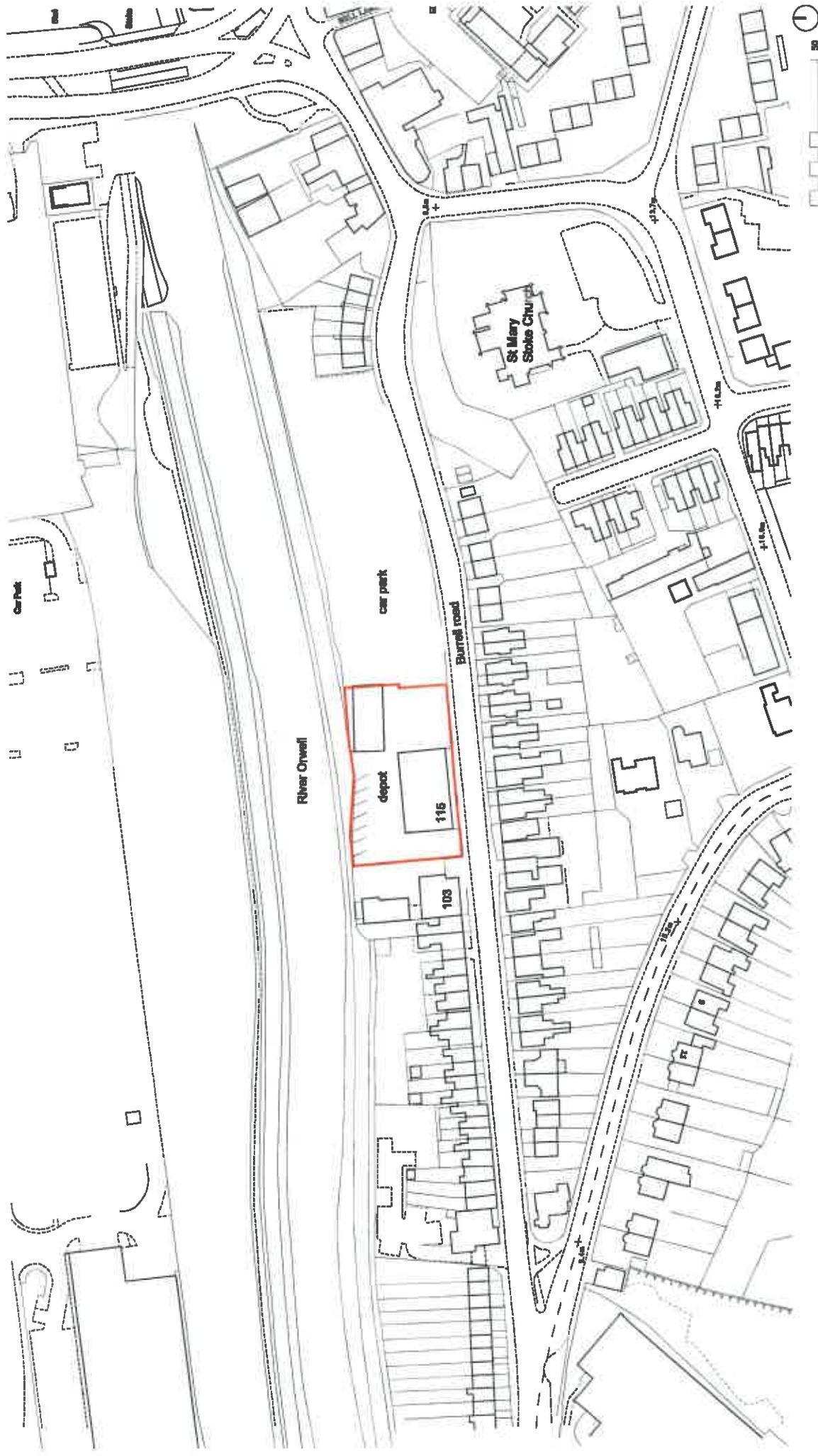
Date: 26 / 02 / 2020  
Scale: 1:1250 @ A4 paper  
Status: PLANNING

GROW Design studio  
Unit 14 Park Farm  
Kedvedon Rd, Inworth  
Colchester CO5 9SH  
+44 (0)1376 572588  
[www.studiogrow.co.uk](http://www.studiogrow.co.uk)



## **APPENDIX TWO – SITE LOCATION PLAN (115 BURRELL ROAD ONLY)**





Project: Residential development  
Address: 115 Burnell Rd, Ipswich IP2 0AE  
Drawing: Location plan  
Client: FGH Ltd  
Drawn / checked: AJ  
Drawing no / Rev: 0054\_A\_CD\_01

Date: 20/02/2018  
Scale: 1:1250 @ A3 paper  
Status: CONCEPT

Rev Description Date

| Rev | Description | Date |
|-----|-------------|------|
| -   | -           | -    |

GROW Design Studio  
No 1, The Machine  
London Road  
Rowthill End  
Wivenhoe, Essex CM9 1HA  
01206 672586  
[www.growdesignstudio.co.uk](http://www.growdesignstudio.co.uk)  
[studio@growdesignstudio.co.uk](mailto:studio@growdesignstudio.co.uk)





# Boyer

15 De Grey Square, De Grey Road, Colchester, CO4 5YQ | 01206 769 018  
[colchester@boyerplanning.co.uk](mailto:colchester@boyerplanning.co.uk) | [boyerplanning.co.uk](http://boyerplanning.co.uk)

**From:** Cindy Lawes ·  
**Sent:** 14 February 2020 15:25  
**To:** PlanningPolicy  
**Subject:** 126 Houses off Alnesbourn Crescent, Ravenswood

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs

### **OBJECTIONS TO THE PROPOSED DEVELOPMENT**

I want to lodge my objections to this proposed development on the following grounds:

#### **Traffic Management**

It is beyond understanding that a suburb this size only has one entrance and exit. The building of another 126 houses will obviously bring additional vehicles into the suburb, and this in turn will undoubtedly exacerbate problems with the already overloaded ingress and egress point to the suburb. We residents have no other option but to manage through the Henning Road roundabout, which is frequently blocked by people trying to get into the MacDonalds (a problem that no-one appears to want to address) and then out the suburb onto a major roundabout. I do not feel it even necessary to begin to mention the problems we residents face when the Orwell Bridge is closed.

Traffic around the MacDonalds will also no doubt increase, causing additional problems.

At a recent Residents' AGM it was mentioned that there was a proposal to create another access road off the A1189. I fail to see how this will alleviate any of the problems as it will simply slow down the movement of vehicles away from the main roundabout will the exit from Ravenswood will become even more congested.

#### **Amenities**

The local doctor's practice, Ravenswood Medical Centre, is already stretched and this situation has been made worse by closure of the Landseer Surgery. Who is going to provide medical services for the new people moving into the suburb ?

CINDY LAWES

A1189

Feb  
26.20

## PROPOSED LOCAL PLAN SITE ALLOCATION

Site ref: IP354-72

Site area: 34ha

Cullingham Road – Ipswich.

26<sup>th</sup> February 2020.

Dear Sir,

I appreciate that some sort of development will probably take place on this site but as one who has lived in the road for the last 15 years I have worries about the scale of this planning proposal.

### INTRODUCTION

\*Cullingham Road is a quiet cul de sac where a large number of the residents have lived for many years, some their whole life. Although not a classy road by any means the people who live here make their little homes their castles and there is a general community feel. People are friendly and talk to each other and work together to keep the road clean and tidy, making it one of the cleanest side roads in this area and maybe Ipswich. We "love our street". Any rubbish generated generally comes from passers by who sit at the end of the road with their fish n chips etc. leaving our residents to clear up after them – which we do regularly. A bigger population may well dilute this quiet and friendly area.

### FLOODING

\*In 1953 and earlier the road flooded quite badly due to the nearby rivers, and there are still people living in the road today who remember this. With recent obvious climate change and increase of flooding all over the UK, despite having improved flood defences the Environment Agency tell us there is every chance we may flood again in the future. Is this the best place to add large numbers of new housing?

## PILING

\*Building close to the river is almost certainly going to necessitate some sort of piling which can cause serious vibrations. Will the current residents be compensated for any cracking or other damage done to their homes as a result of this? The current houses are right next to the planned development area.

## WILDLIFE CONSERVATION

\*My neighbours tell me that there is a large population of Great Crested Newts living on the river bank and land in that area of Cullingham Road. Due to enormous declines in range and abundance in the last century, the great crested newt is strictly protected by British and European law which makes it an offence to: kill, injure, capture or disturb them; damage or destroy their habitat; and to possess, sell or trade.

## ROAD QUALITY/ MAINTENANCE and TRAFFIC

\*We do our bit to look after our road, but it is not seen as a high priority road for maintenance etc. by councils, and as such suffers from pot holes and poor road surfacing, beyond the control of the residents. I also understand that the sewer pipes in the road are not huge and probably not suitable for an enlarged population. This would all need to change if the road is to have more people living in it and driving along it. At the very least we need to have the "Please Keep Clear" reinstated on the Handford Road junction which is already a problem for cars to get in and out of, often making traffic queues on Handford Road as cars wait for a chance to turn into Cullingham Road. There will also be increased traffic and large vehicles passing along Cullingham Road when the building works are in progress. This is likely to destroy our already crumbling road even more.

## PARKING

\*Currently cars are generally parked on both sides of the road the full length of the road. If new housing were to be built would there be sufficient parking for them? It would be idle to pretend that none of the new residents will have a car. Some may have two cars and quite likely a works van too.

## CHILDRENS' PLAY AREA

\*There is nowhere for children to play in Cullingham Road apart from in the road itself. Parents understandably are not keen letting their children play in the road. Will the gardens be sufficiently large or will a proper secure play area be created?

There is also another planning proposal on the opposite side of the road for another 6 dwellings on top of the 24 by the river. All the above applies to both of the developments.

## CONCLUSION

The residents all accept that some sort of development, residential or otherwise, will probably take place on this plot. Our main concerns are the size of development and will this be a Housing Association or similar development? Currently a large proportion of the houses in Cullingham Road are owner occupied. To dilute this would probably not be ideal for the future of the road.

Tim Leggett.

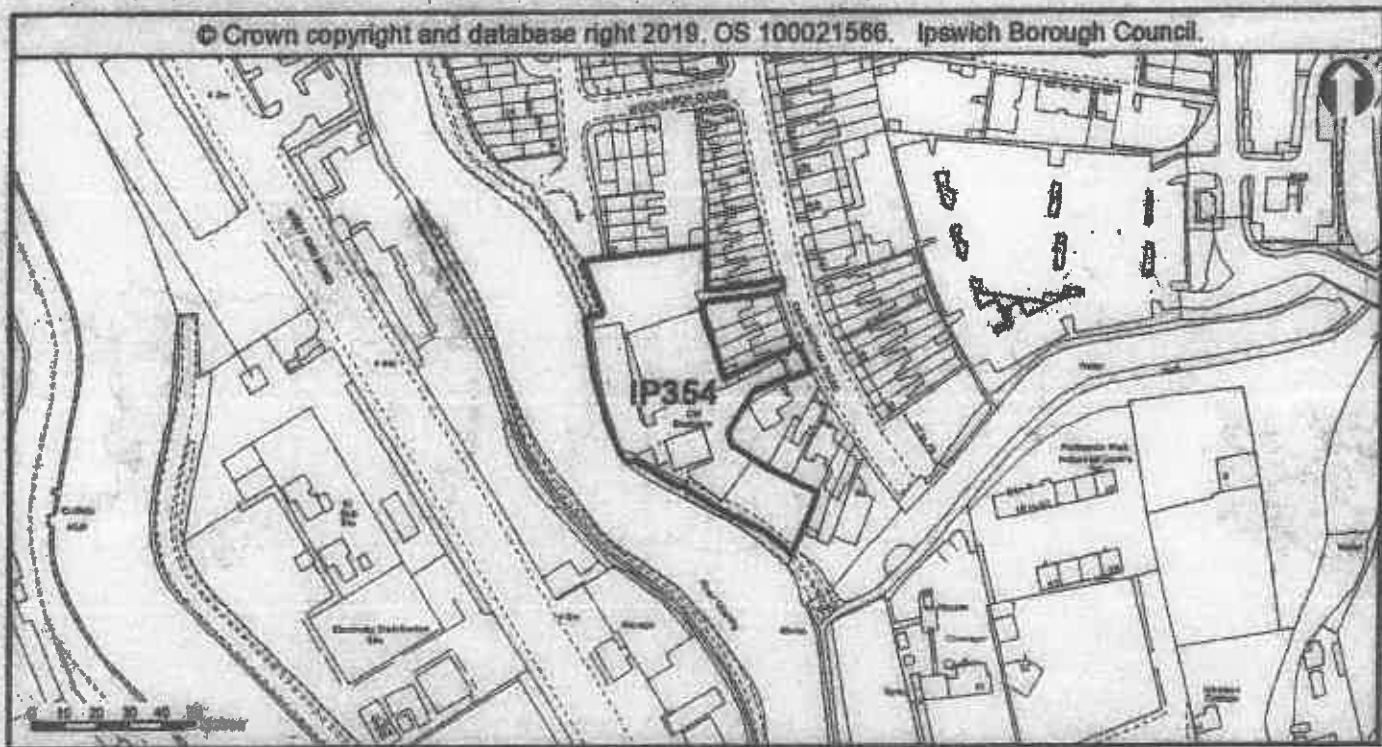
# IPSWICH BOROUGH COUNCIL

# PUBLIC NOTICE

**PLEASE NOTE THIS IS A PROPOSED LOCAL PLAN SITE ALLOCATION NOTICE AND NOT A NOTICE OF A PLANNING APPLICATION**

Site ref: IP354 – 72 (Old Backyard) Collyham Road  
Site area: 0.34ha  
Proposed use: Residential (34 dwellings)

Proposed Local Plan Site Allocation - Allocation Policy 2020.



Members of the public can inspect the Part 2 : Final Draft Site Allocation and Policy  
Document from December 2019 via the Council's website at [www.ipswich.gov.uk](http://www.ipswich.gov.uk) and click on 'Current Consultations', or at the Central Library, Customer Services Centre or Gresham House (by appointment) during the public consultation period, which runs between Wednesday 16<sup>th</sup> January and Monday 2<sup>nd</sup> March 2020. All comments on the proposed allocations must be made in writing, and be received either electronically via the Ipswich Borough Council website, or by email / letter to the address below by 11.00pm on Monday 2<sup>nd</sup> March 2020.

**DATE OF PUBLIC NOTICE 16<sup>th</sup> January 2020**



**IPSWICH**  
BOROUGH COUNCIL

Planning and Development  
Ipswich Borough Council  
Gresham House, 15-17 Russell Street  
Ipswich IP1 2UE  
01473 230200  
[email:planning@ipswich.gov.uk](mailto:email:planning@ipswich.gov.uk)  
[www.ipswich.gov.uk/planning.aspx](http://www.ipswich.gov.uk/planning.aspx)

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 26<sup>th</sup> February 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England)  
Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

 → [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website: [www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                               |                                                                                                                                                                                                                                                  |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation document(s) to which this comments form relates: | <p><b>Ipswich Local Plan Review Final Draft Consultation</b></p> <p><b>Table 8B</b></p> <p>figure 1 – headed access <b>Access &amp; Transport</b></p> <p><b><u>Improvements to fonnereau way (north section to Lower Rd)</u></b></p>             |
| Please return this comments form to:                          | <p><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</p> <p>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</p> |
| Return by:                                                    | <b>11.45pm Wednesday 26<sup>th</sup> February 2020</b>                                                                                                                                                                                           |
| This form has two parts:                                      | <p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>                                                                                                                                                                  |

#### **PART A PERSONAL DETAILS**

| Title                         | 1. Personal details | 2. Agent's details (if applicable) |
|-------------------------------|---------------------|------------------------------------|
| First name                    | Mr & Mrs            |                                    |
| Last name                     | Fred                |                                    |
| Job title (where relevant)    | Financial Manager   |                                    |
| Organisation (where relevant) | The Docks           |                                    |
| Address (Please include       |                     |                                    |

## PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation  
(and client if you are an agent):

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part                                             | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Access &amp; Transport northern end of the so called fonnereau way</b> | <p><b>Northern end section of the so called fonnereau way walk.</b></p> <p>Having just been held up for over 20 minutes on our walk at the northern end section of the so called fonnereau way while a sewage lorry empties slurry at broad acres farm, we find this route is highly unsuitable and unacceptable for pedestrians for safety reasons. This is an accident blackspot waiting to happen.</p> <p>The slurry lorry took up the entire width of the access and we had to stand in the rain and wait until it was complete. This section of the walk does not comply with the design and access statement where all 'uses' in an area must be compatible with each other, these potential conflicts with be must be identified and resolved within the design.</p> <p>How can pedestrians walk a route where slurry lorries are taking up the complete width of the access? Furthermore, this lorry had to reverse and my concerns raise the serious issue that if someone was partially sighted or a child was walking alone, heavens knows what might happen. This section of the walk is unsafe for pedestrians. We spoke to another person who we saw walking along the adjoining Lower Road in Westerfield and they told us, they find the route highly unsafe as the access is the main driveway to the water-board pumping station and a house, where cars and lorries use it on a daily basis.</p> <p>Ipswich Borough Council you need to get your act together as your design in figure 1 – headed access and movement does not take into account moving lorries and vehicles, therefore we won't be walking this route again, its unsafe!</p> <p>We saw that on figure 2 the orange line marked indicating the new position for this so called fonnereau way will avoid potential danger by accessing a safer route directly into the park avoiding lorries and vehicles.</p> <p>We say as a family Ipswich Borough Council you have a duty to make access safe for all pedestrians, so come on and make us a safe route!!!!</p> <p>We have attached the relevant plans for your immediate attention</p> <p>Mr and Mrs Lewis and Family</p> <p>Ipswich resident.</p> |

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
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Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Wednesday 26<sup>th</sup> February 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

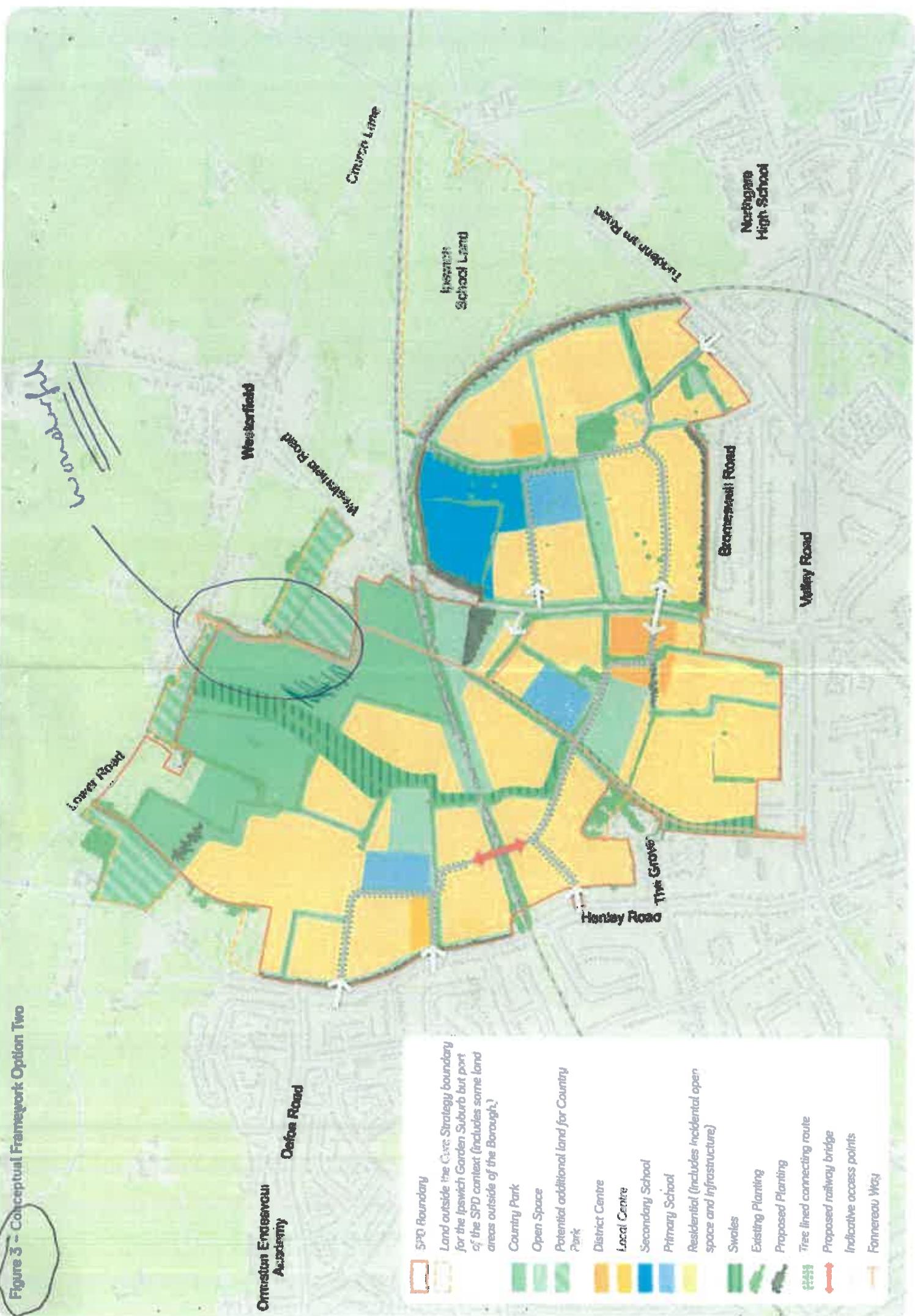
**Adoption of the Ipswich Local Plan Review.**

**PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).



Figure 3 - Conceptual Framework Option Two



# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:

[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:

[www.ipswich.gov.uk](http://www.ipswich.gov.uk)



|                                                                      |                                                                                                                                                                                                                                            |
|----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>Draft Ipswich Local Plan</b>                                                                                                                                                                                                            |
| <b>Please return this comments form to:</b>                          | <u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or<br><br>Planning Policy Team<br>Planning and Development<br>Ipswich Borough Council<br>Grafton House<br>15-17 Russell Road<br>Ipswich<br>IP1 2DE |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                            |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                   |

#### PART A PERSONAL DETAILS

|                                               | <b>1. Personal details</b>        | <b>2. Agent's details (if applicable)</b> |
|-----------------------------------------------|-----------------------------------|-------------------------------------------|
| <b>Title</b>                                  | Councillor                        |                                           |
| <b>First name</b>                             | Timothy                           |                                           |
| <b>Last name</b>                              | Lockington                        |                                           |
| <b>Job title (where relevant)</b>             | (retired) consultant geriatrician |                                           |
| <b>Organisation (where relevant)</b>          | Ipswich Liberal Democrats         |                                           |
| <b>Address<br/>(Please include post code)</b> |                                   |                                           |
| <b>E-mail</b>                                 |                                   |                                           |
| <b>Telephone No.</b>                          |                                   |                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                             |                                                      |
|-------------------------------------------------------------|------------------------------------------------------|
| Your name or organisation (and client if you are an agent): | Councillor Tim Lockington, Ipswich Liberal Democrats |
|-------------------------------------------------------------|------------------------------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.                                                                                                                             | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| <b>Housing for older and disabled people, Ministries of Housing Communities and local Government 26/06/2019 paragraphs 001 to 0012 ID: 63-001-20190626</b> | <p>Councillor Dr Tim Lockington, comments as Borough Councillor but also a recently retired Ipswich-based consultant geriatrician.</p> <p>National Guidance, 26<sup>th</sup> June 2019, provides clear guidance concerning the needs of independent older people and the provision of suitable homes which will support continuing independence into advanced age. It recognises that there will be a need for specialised housing stock, such as single level bungalows with accessible bathrooms and ease of entry and exit.</p> <p>This guidance does not appear to be reflected in the draft framework with respect to housing and older people page 70: 8.117. This item references projected over-provision of advanced accommodation (sheltered housing – projected surplus 185 Class C3b dwellings).</p> <p>It does not address the 57.8% projected increase in people over 65 nor is there any discussion of the need to develop a housing stock suitable for older people able and wishing to live at a level of independence that does not require C3b sheltered housing. Much of the current older Ipswich Housing stock (such as 2 up 2 down terraced accommodation) is poorly accessible and poorly adaptable to the maintenance of independence for frail older people who become trapped in their own homes and prematurely dependent on care.</p> <p>Current trends, in Ipswich, the acquisition by younger families of bungalows formerly owned and occupied by older people which are then modified, resulting in properties less suitable for an older person, and also the predominance in new builds of 2 and a half or three storey Town Houses, are unhelpful in this regard.</p> <p>Informal discussions with developers of the large-scale “northern-fringe” which is anticipated to meet much of the early identified housing need, does not indicate an awareness or intention to develop accommodation that is older age appropriate, within the mixed housing proposed.,</p> <p>Rather than trapping older people in older and less suitable accommodation, we would request that the inspector reflects on national guidance for the housing needs of older people and recommends appropriate adjustments to the draft Development Framework.</p> |
| <b>Ipswich Draft Development Plan page 70, 8.117</b>                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| <b>Document(s) and document part.</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
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**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|
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Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

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**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

**PRIVACY NOTICE**

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As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**M**



## **Felicia Blake**

---

**From:** Magor, Lisa <  
**Sent:** 20 January 2020 16:41  
**To:** PlanningPolicy  
**Subject:** IP307-prince of wales drive

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good afternoon,

I am writing to inform you that, as a resident of prince of wales drive, I will be strongly opposing the current development plan by Orwell housing (yet to be submitted).

Kind regards

**Lisa Magor**

This e-mail and any files transmitted with it are confidential. If you are not the intended recipient, any reading, printing, storage, disclosure, copying or any other action taken in respect of this e-mail is prohibited and may be unlawful. If you are not the intended recipient, please notify the sender immediately by using the reply function and then permanently delete what you have received. Content of emails received by this Trust will be subject to disclosure under the Freedom of Information Act 2000, subject to the specified exemptions, including the The General Data Protection Regulation (EU) 2016/679 and Caldicott Guardian principles. East Suffolk and North Essex NHS Foundation Trust, Turner Road, Essex, CO4 5JL

**Felicia Blake**

---

**From:** JIJANA MAKSIMOVIC  
**Sent:** 27 February 2020 11:05  
**Cc:** PlanningPolicy  
**Subject:** Planning premition for South of Patterson rd

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi,

I am a bit concerned that you might be building a new block of Apartments near were I live.  
This area is already well build up and we struggle with parking as every household has 2 or more car's.  
We are all concerned as how this will impact on us living here.

Thank you

Regards Lily Maksimovic

Sent from Yahoo Mail on Android

**Felicia Blake**

---

**From:** Sutton, Georgie  
**Sent:** 02 March 2020 13:33  
**To:** PlanningPolicy  
**Cc:** Pavitt, Tom  
**Subject:** Consultation response Ipswich Local Plan Review Final Draft  
**Attachments:** 200211\_Ipswich\_GS.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/Madam,

Many thanks for giving us the opportunity to respond to the Ipswich Local Plan Review Final Draft. Please find attached our response letter. The first page contains general marine planning information and legal responsibilities. Page two briefly details specific consideration for the Local Plan, and clarifying wording.

In addition to this, if you would like further information on the South East or East Marine Plans, I would be happy to provide a meeting covering general information on marine planning, monitoring and implementation of the marine plans, tools for implementation and an update on the development of marine plans in England.

Please do not hesitate to get in touch if you have any questions.

Kind regards,

Georgie

Georgie Sutton | Marine Planner (East) | Marine Planning | Marine Management Organisation

Address: MMO, Pakefield Road, Lowestoft, Suffolk NR33 0HT

uk

[Explore Marine Plans](#) | [Website](#) | [Twitter](#) | [Facebook](#) | [Linkedin](#) | [Blog](#) | [Instagram](#) | [Flickr](#) | [YouTube](#) |  
[Google+](#) | [Pinterest](#)

The public consultation on the [draft North East](#), [draft North West](#), [draft South East](#) and [draft South West](#) Marine Plans is open until 6 April 2020. Make your representations by following the links.

[Explore Marine Plans - EMP \(digital service\)](#).

To receive marine planning updates and our newsletter enter your details [here](#).

This message has been sent using TLS 1.2

The Marine Management Organisation (MMO) The information contained in this communication is intended for the named recipient(s) only. If you have received this message in error, you are hereby notified that any disclosure, copying, distribution or taking action in reliance of the content is strictly prohibited and may be unlawful. Whilst this email and associated attachments will have been checked for known viruses whilst within MMO systems, we can accept no responsibility once it has left our systems. Communications on the MMO's computer systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.



# Marine Management Organisation

MMO Lowestoft  
Pakefield Road  
Lowestoft  
Suffolk  
NR33 0HT

[www.gov.uk/mmo](http://www.gov.uk/mmo)

Our ref: ID 186

Planning Policy  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

2<sup>nd</sup> March 2020

Dear Sir/Madam,

## MMO Marine Planning and Marine Licensing response to Ipswich Local Plan Review Final Draft Consultation

Thank you for giving us the opportunity to comment on the Ipswich Local Plan Review Final Draft Consultation. The comments provided within this letter refer to the document entitled Ipswich Local Plan Review Final Draft Consultation.

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the draft South East Marine Plan is of relevance. The South East Marine Plans cover the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the draft South East Marine Plan.



INVESTORS  
IN PEOPLE | Bronze

or the [UK Marine Policy Statement](#) (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#), [Explore Marine Plans](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

### **Marine Licensing**

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the [UK marine area](#). The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters.

The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

### **Summary notes**

Please see below suggested policies from the East Inshore and East Offshore Marine Plans that we feel are most relevant to your local plan.

These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East and East Marine Plans is completed:

- [South East Marine Plan](#) policies which may be of relevance:
  - Heritage assets (SE-HER-1), Employment (SE-EMP-1), Air Quality (SE-AIR-1), Biodiversity policies, Cross border co-operation (SE-CBC-1)
- [East Marine Plan](#) policy areas to consider: Governance, Economy, Social, Ecology, and Biodiversity.

### **Further points to note**

**Section 8.78:** You refer to the South East Inshore Marine Plan. This is currently out for consultation until 6<sup>th</sup> April 2020. As the plan is out for consultation, it is now a document for material consideration. We would recommend you mention the [draft South East Marine Plan here](#).

To clarify, the previous engagement periods were not formal consultation, they formed the iterations. Also, there is only one plan for the area in the South East, not an inshore and offshore plan as there is for other areas.

The [East Inshore and East Offshore Marine Plans](#) were adopted in 2014, which covers the adjacent areas, and the north bank of the Orwell. Please ensure correct reference to the South East and East marine plan areas where included.

As previously stated, these are recommendations and we suggest that your own interpretation of the draft South East Marine Plans is completed. We would also recommend you consult the [Explore Marine Plans](#), our marine planning portal, for further information.

**Yours sincerely,**

**Tom Pavitt**  
**Marine Planner (South East)**

**Telephone:**  
**Mobile:**  
**Email:**  
—

**Georgie Sutton**  
**Marine Planner (East)**

**Telephone:**  
**Mobile:**  
**E-mail:**

## **Felicia Blake**

---

**From:** Stewart McCarthy ·  
**Sent:** 26 January 2020 20:35  
**To:** PlanningPolicy  
**Subject:** 23-30 dwellings in Lavenham Road, Ipswich

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr & Mrs S McCarthy

Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

26th January 2020

Dear Sir/madam,

Reference - Planning Application no IP061 (UC064). Former School Site, Lavenham Road, Ipswich.

Proposed use, proposed erection of 23-30 dwellings in Lavenham Road, Ipswich by Ipswich Borough council. We write in connection with the above planning application. We have examined the plans and we know the site well. We wish to object strongly to the development of these 23-30 dwellings in this location. Lavenham Road is a dispersed settlement where development proposals should be considered very carefully. Infilling the green space would and has ruined the character of the area and overwhelmed it. We should also consider the protection of crane manor and its historic values, as this building is grade 2 Listed. Permission should be refused for development of poor design and quality that fails to take the opportunities available for improving the character and quality of the area and the way it functions.

The proposed siting of this development is particularly ill-considered. It is a green space used by many locals for recreation and walking dogs, and building here would diminish the area and the beautiful view. A building has already been built and that has changed our out look forever.

Green spaces play an important role in an urban 'ecosystem' providing a place for physical activity, relaxation, social interaction, community events, and so on. In high-density urban areas, or areas with a high concentration of traffic there will be no clean and there will be a high level of noise pollution.

Access to green open spaces is considered important for mental health and wellbeing. The world health organisation (WHO) has highlighted analysis suggesting that physical activity in a natural environment can help alleviate mild depression and reduce physiological stress indicators.

The proposed 23-30 dwellings will have a negative impact on the area and other properties through noise levels, overlooking, overshadowing, smells, light pollution, loss of natural light, loss of privacy, dust, vibration or late night activities. Then there is the subject of anti-social behaviour, which can have a detrimental effect on one's life, health and wellbeing.

The development will cause traffic problems such as traffic generation, access and safety problems. The proposal reduces the amount of car parking available, it will also cause parking issues. The local infrastructure is not adequate to service the proposed development.

If there is a meeting held on the discussion of this development please contact us and let us know the time and date as we wish to attend. Many thanks.

**Yours sincerely**  
**Mr & Mrs S McCarthy.**

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                               |                                                                                                                                                                                                                                     |
|---------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation document(s) to which this comments form relates: | <b>Ipswich Local Plan</b><br><b>Core Strategies</b><br><b>Green Corridors</b>                                                                                                                                                       |
| Please return this comments form to:                          | <a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or<br><br>Planning Policy Team<br>Planning and Development<br>Ipswich Borough Council<br>Grafton House<br>15-17 Russell Road<br>Ipswich<br>IP1 2DE |
| Return by:                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                     |
| This form has two parts:                                      | Part A – Personal details<br><br>Part B – Your comment(s).                                                                                                                                                                          |

| <b>PART A PERSONAL DETAILS</b>         |                     |                                    |
|----------------------------------------|---------------------|------------------------------------|
|                                        | 1. Personal details | 2. Agent's details (if applicable) |
| Title                                  | Mrs                 |                                    |
| First name                             | Andrea              |                                    |
| Last name                              | McDonald            |                                    |
| Job title ( <i>where relevant</i> )    |                     |                                    |
| Organisation ( <i>where relevant</i> ) |                     |                                    |
| Address<br>(Please include post code)  |                     |                                    |
| E-mail                                 |                     |                                    |
| Telephone No.                          |                     |                                    |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                 |
|----------------------------------------------------------------------|-----------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Andrea McDonald |
|----------------------------------------------------------------------|-----------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.  | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Core Strategies<br>5.26 table 2 | I do not understand why “cheap car parking” is listed alongside walking/cycling routes and public transport. This would encourage more driving therefore more air pollution                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| Green Corridors                 | I can only see arrows pointing towards parks/green areas. These are however not interconnected with each other. There is no coherent walking or cycling route. Especially problematic is the area around the roundabout near St Peters Church. A route from the waterfront/ river towpath is cut up by the gyratory.<br><br>The river towpath is too narrow to cycle on and its surface keeps deteriorating. Is there any plan improving the towpath? More usage of it would also make people more confident using it.<br><br>The river path needs to be connected with the waterfront area. Currently driving is still allowed there. It is an area around the university and various cafes and restaurants. Passing traffic also poses danger to children |
|                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

| <b>Document(s) and document part.</b> | <b>Comment(s)</b> (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|                                       |                                                                                                                     |

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

| Document(s) and document part | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |
|-------------------------------|--------------------------------------------------------------------------------------------------------------|
|                               |                                                                                                              |
|                               |                                                                                                              |
|                               |                                                                                                              |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

### PRIVACY NOTICE

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

This submission is confirmed

[26305]

**Object Supporting Documents, Ipswich Local Plan Policies Map Final Draft**

Agent: Phase 2 Planning and Development Ltd (Mr Kevin Coleman) [200] (unconfirmed)

Respondent: Mersea Homes Limited [2548]

Received: 02/03/2020 via Web

With regard to land use designations within the IGS, there is a lack of clarity/consistency to terminology, and in any event there is no need for specific land use allocations within the overall IGS, or justification for the specific areas shown.

**Changes to plan:** Removal of land use allocations within the overall IGS allocation, or at least adjustment to the key/text to make clear that all are indicative.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** This representation is part of a suite of representations made by Mersea Homes Ltd which all relate to the effective implementation of development within the Ipswich Garden Suburb. Mersea Homes Ltd is the principal development party for the delivery of the eastern neighbourhood within the Ipswich Garden Suburb (Red House Neighbourhood).

This submission is confirmed

[26306]

### Object Policy DM23 The Density of Residential Development

Agent: Phase 2 Planning and Development Ltd (Mr Kevin Coleman) [200] (unconfirmed)

Respondent: Mersea Homes Limited [2548]

Received: 02/03/2020 via Web

Part (c) of the policy as drafted would not be effective as there is no practical means for ensuring an average of 35 dph across multiple sites, and no justification for stipulating 35 dph on any particular individual site, and no justification for "low-density development" per se.

**Changes to plan:** Please see full representation text for amendments.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** This representation is part of a suite of representations made by Mersea Homes Ltd which all relate to the effective implementation of development within the Ipswich Garden Suburb. Mersea Homes Ltd is the principal development party for the delivery of the eastern neighbourhood within the Ipswich Garden Suburb (Red House Neighbourhood).

This submission is confirmed

[26307]

### Object Policy DM21 Transport and Access in New Developments

Agent: Phase 2 Planning and Development Ltd (Mr Kevin Coleman) [200] (unconfirmed)

Respondent: Mersea Homes Limited [2548]

Received: 02/03/2020 via Web

Whilst no objections are raised in respect of the majority of the provisions of this policy, we are concerned that a requirement that all new development should have access to public transport within 400m is neither justified (in terms of its being a fixed requirement) nor likely to mean that the Plan is effective overall in delivering the number of new homes required, because there are some locations where a strict adherence to 400m is unlikely to be achievable.

**Changes to plan:** Please see full representation text for proposed changes.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** This representation is part of a suite of representations made by Mersea Homes Ltd which all relate to the effective implementation of development within the Ipswich Garden Suburb. Mersea Homes Ltd is the principal development party for the delivery of the eastern neighbourhood within the Ipswich Garden Suburb (Red House Neighbourhood).

This submission is confirmed

[26308]

### Object Policy CS16 Green infrastructure, Sport and Recreation

Agent: Phase 2 Planning and Development Ltd (Mr Kevin Coleman) [200] (unconfirmed)

Respondent: Mersea Homes Limited [2548]

Received: 02/03/2020 via Web

The policy needs to be clear that new development should meet the needs arising from that development, having regard to the Council's standards, and should not be required to remedy existing deficits.

**Changes to plan:** Please see full representation text for suggested amendments.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** This representation is part of a suite of representations made by Mersea Homes Ltd which all relate to the effective implementation of development within the Ipswich Garden Suburb. Mersea Homes Ltd is the principal development party for the delivery of the eastern neighbourhood within the Ipswich Garden Suburb (Red House Neighbourhood).

This submission is confirmed

[26309]

### Object Policy CS15 Education Provision

Agent: Phase 2 Planning and Development Ltd (Mr Kevin Coleman) [200] (unconfirmed)

Respondent: Mersea Homes Limited [2548]

Received: 02/03/2020 via Web

The secondary school site at the Ipswich Garden Suburb should be referenced in the same way as primary school sites i.e. as a broad location (or, as per our representations to the Policies Map, all allocations within the IGS should be removed).

**Changes to plan:** Please see full representation text for proposed amendments.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** This representation is part of a suite of representations made by Mersea Homes Ltd which all relate to the effective implementation of development within the Ipswich Garden Suburb. Mersea Homes Ltd is the principal development party for the delivery of the eastern neighbourhood within the Ipswich Garden Suburb (Red House Neighbourhood).

This submission is confirmed

[26330]

### Object Policy CS10 Ipswich Garden Suburb

Agent: Phase 2 Planning and Development Ltd (Mr Kevin Coleman) [200] (unconfirmed)

Respondent: Mersea Homes Limited [2548]

Received: 02/03/2020 via Web

Mersea Homes Ltd are broadly supportive of Policy CS10 and its various provisions, but in order to ensure effective delivery, there are three aspects of the policy that are considered to be unsound, as follows:

1. Elements of the detailed wording of the policy in relation to site specific matters and the role of the SPD, which relate to Effectiveness;
2. The Affordable Housing provisions, which relate to soundness issues in respect of the justification and the effectiveness of the Policy;
3. The wording of the Policy in respect of viability review provisions.

**Changes to plan:** Please see full representation text for proposed amendments.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** This representation is part of a suite of representations made by Mersea Homes Ltd which all relate to the effective implementation of development within the Ipswich Garden Suburb. Mersea Homes Ltd is the principal development party for the delivery of the eastern neighbourhood within the Ipswich Garden Suburb (Red House Neighbourhood).

**Felicia Blake**

---

**From:** Stephen Morgan  
**Sent:** 23 February 2020 14:29  
**To:** PlanningPolicy  
**Subject:** Objection to proposed planning

23/02/2020

Dear sir/madam,

Reference IP354 (72 old boatyard) Cullingham Rd ,proposed allocation of 24 dwellings.

I write in connection with the above proposed planning application, I have examined the plans and I know the site well and wish to object strongly to the development of this land for housing.

This would have an impact on an already busy road aswell as having a detrimental effect on the wildlife around the river bank.

Our property would also be overlooked by the development resulting in a loss of privacy.

Noise pollution from the said development would also have an impact.

Cullingham Rd has already issues with parking and this development would make this situation even worse.

Access to the site for heavy machinery would be impossible as the road is not wide enough.

I trust that the above objections will be taken fully into account in determining this application.

Yours sincerely  
Stephen morgan

Sent from my iPhone

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

N



Our Ref: MV/15B901605

14 February 2020

Ipswich Borough Council  
Via email only

[avisonyoung.co.uk](http://avisonyoung.co.uk)

Dear Sir / Madam

**IPSWICH LOCAL PLAN REVIEW FINAL DRAFT  
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

**Response**

We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

**Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans

Avison Young is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB

Regulated by RICS

Agent : 2527  
Ref : 2055

and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

**Matt Verlander, Director**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

**Spencer Jefferies, Town Planner**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

**Matt Verlander MRTPI**  
**Director**

**For and on behalf of Avison Young**

### **Guidance on development near National Grid assets**

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

#### **Electricity assets**

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: [www.nationalgrid.com/network-and-assets/working-near-our-assets](http://www.nationalgrid.com/network-and-assets/working-near-our-assets)

#### **Gas assets**

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

#### **How to contact National Grid**

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: [plantprotection@nationalgrid.com](mailto:plantprotection@nationalgrid.com)

Cadent Plant Protection Team  
Block 1  
Brick Kiln Street  
Hinckley  
LE10 0NA  
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>



Martyn Fulcher BSc (Hons) PGDip MRTPI  
Head of Development  
Ipswich Borough Council  
planningpolicy@ipswich.gov.uk

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

**BY EMAIL ONLY**

Dear Mr Fulcher

**Ipswich Local Plan Review final draft:**

- (1) Core Strategy and Policies Development Plan Document Review Final Draft;
- (2) Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft;
- (3) Final Draft Ipswich Local Plan 2018 – 2036 Sustainability Appraisal Report (Strategic Environmental Assessment and Sustainability Appraisal);

Thank you for your consultation on the above dated and received by Natural England on 15<sup>th</sup> January 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Local Plan – Core Strategy and Policies Development Plan document review final draft**

We have the following comments on the soundness of the Local Plan.

Natural England is satisfied that our recommendations at earlier stages in the Local Plan process have been taken into account within the Ipswich Local Plan final draft.

We are also satisfied that the Habitats Regulations Assessment has provided a robust assessment of the Ipswich Local Plan final draft, in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) and having regard to relevant caselaw.

We are pleased that the recommendations for the strengthening of policy wording in the HRA screening report have been incorporated within the final draft of the Core Strategy, and issues carried forward into the Appropriate Assessment stage as we would expect, with recommendations for appropriate mitigation.

We are also satisfied that the methodology and baseline information used to inform the report appears to meet the requirements of the SEA Directive [2001/42/EC] and associated guidance. Furthermore the final SA contains a robust assessment of the environmental effects of plan policies and allocations on statutorily designated sites and landscapes including the Orwell Estuary SPA, SSSIs and the Suffolk Coast and Heaths AONB and has taken into account both our advice and the findings of the HRA.

**Therefore, Natural England considers the approach taken with regards to the natural environment to be sound (in accordance with our remit) within the Ipswich Local Plan final draft.**

I hope you have found this letter helpful. If you have any queries relating to the advice in this letter please contact me on [Francesca.shapland@naturalengland.org.uk](mailto:Francesca.shapland@naturalengland.org.uk) or at 0208 0265792.

Yours sincerely

Francesca Shapland  
Lead Adviser, Norfolk & Suffolk Team



Planning and Development  
Ipswich Borough Council  
Grafton House, 15-17 Russell Road  
Ipswich

Katie Brown  
Senior Town Planner i Group Property  
One Eversholt Street, London, NW1 2DN

Date: 02/03/20

Dear Sir/Madam,

**Consultation - Ipswich Local Plan Review Final Draft**

Thank you for consulting Network Rail Infrastructure Ltd on the consultation of the Ipswich Local Plan Review Final Draft. We have reviewed the following documents and our comments can be found below:

- (1) Core Strategy and Policies Development Plan Document Review Final Draft;
- (2) Site Allocations and Policies (Incorporating IP-One Area Action Plan)
- Development Plan Document Review Final Draft;
- (3) Local Plan Policies Maps Final Draft;
- (4) Final Draft Ipswich Local Plan 2018 – 2036 Sustainability Appraisal Report (Strategic Environmental Assessment and Sustainability Appraisals);
- (5) Consultation Statement Ipswich Borough Council Local Plan Review Preferred Options January – March 2019; and
- (6) Supporting Documents.

**Core Strategy:**

It is encouraging to see that Network Rail is mentioned in Policy ISPA2 Strategic Infrastructure Priorities as a working partner of Ipswich Borough Council to enable the delivery of key infrastructure projects.

We support Policy CS5 in relation to Improving Accessibility and agree that Inclusive transport infrastructure should be a priority. This will be especially important with the population increase in the local area that would be generated by the growth in local economy and new housing outlined in Policy CS7 The Amount of Housing Required.

Network Rail have previously responded to planning applications in relation to Policy CS10 Ipswich Garden Suburb, where we have requested further information and mitigation measures in relation to the potential impacts on the Westerfield Level Crossing. We would actively encourage early engagement on strategic development sites to ensure all impacts are identified and taken into consideration at the masterplan stage. This is especially important in the context of Policy CS17 Delivering Infrastructure, where developments will be required to meet the on and off site infrastructure requirements and Policy CS20: Key Transport Proposals.

#### **Site Allocations and Policies:**

Network Rail has no sites to put forward for allocation at present, however should sites come available we will be sure to engage with you at the earliest available opportunity.

#### **Development Management:**

We would like to take this opportunity to remind you that Network Rail is a statutory consultee for any planning application within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, DMPO) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the DMPO).

#### **Other Considerations:**

If you are planning on doing any work near the railway please contact the Anglia ASPRO team, who can help you with a multitude of works including:

- construction sites near the railway
- utility works (water, electric, gas, cabling etc.)
- radio transmitters
- bridge works
- domestic maintenance (e.g. roof, scaffolding, building repair and maintenance)
- new road schemes
- inspection and surveying
- works within the designated precautionary area of level crossings
- domestic related projects (e.g. house extension) under domestic maintenance (e.g. roof, scaffolding, building repair and maintenance)

**Network Rail**

**Asset Protection Team**

**11th Floor, One Stratford Place**

**Montfichet Road**

**Network Rail Infrastructure Limited Registered Office: Network Rail, One Eversholt Street, London, NW1 2DN Registered In England and Wales No. 2904587 [www.networkrail.co.uk](http://www.networkrail.co.uk)**

Stratford, London  
E20 1EJ

Manager: Julie Houghton  
**NEW ENQUIRIES**  
[AssetProtectionAnglia@networkrail.co.uk](mailto:AssetProtectionAnglia@networkrail.co.uk)

It is worth keeping abreast of Network Rail's Strategic Planning documents for the Anglia Route to be used as an evidence base for the Local Planning Policy documents. The most recent documentation can be downloaded via the following page: <https://www.networkrail.co.uk/running-the-railway/long-term-planning/>

Please feel free to contact me with any queries you may have.

Yours Sincerely

Katie Brown  
Senior Town Planner



## NORTHERN FRINGE PROTECTION GROUP

### Safeguarding the Character of Ipswich

### Comments on the Ipswich Borough Council CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW – FINAL DRAFT January 2020 - Consultation Ending 2nd March 2020

Please find our representation on the above. We want to see a sound evidence-based Core Strategy (CS) in place which will help make Ipswich a more attractive place to live and work. We have made our comments on the CS (which we also reference as the Plan) sequentially although these will relate to the same issue in different sections of the CS. Rather than keep repeating our comments, IBC should assume that our comments on each issue apply throughout the CS to that issue, wherever the issue is mentioned in the CS. We would like to provide oral evidence at the formal planning Inquiry.

#### Summary of key issues

Our main concerns with the CS are mainly in relation to traffic related issues, including delivering the required infrastructure and modal shift and the associated impact on air quality, including the lack of funding to deliver the required improvements. For ease of reference we provide a summary of our key concerns which show that the CS is not sound without modifications to these areas.

#### **Transport and improving accessibility**

1. Previous modelling has shown that many junctions and link roads in Ipswich are already at/near capacity, but this is not addressed in the CS. There is no evidence that proposed growth in the CS is sound in relation to transport proposals in the years up to 2026.
2. Transport modelling shows severe capacity issues in 2026 at many key junctions in and around Ipswich that will result in gridlock but there are no transport infrastructure projects included in the Infrastructure Tables to resolve these capacity constraints. This is especially the case in and around the town centre, Ipswich Garden Suburb and the A1214.
3. The Transport modelling fails to identify when these Ipswich junctions will reach capacity (evidence shows that some already have) and consequently the CS fails to adequately plan for this.
4. IBC is failing to Improve Access in Ipswich in breach of CS5. More needs to be done otherwise the Modal Switch assumptions used in the traffic modelling are too high and unsound resulting in non-compliance with CS20 Transport. The CS is not justified with respect to Improving Access and Transport.
5. The Committee on Climate Change assumes that there will be a 10% transport modal shift by 2050. Where is the evidence that IBC can deliver around 15% modal shift by 2026? – a ridiculously short timeframe for such a high target. Unless IBC can provide evidence that it can achieve higher levels of modal shift than the CCC thinks feasible, the CCC assumption should be used in the modelling work for the CS to be sound.
6. Evidence shows that the existing walking and cycling infrastructure in Ipswich is clearly sub-standard and will not enable delivery of the levels of modal shift required without substantial improvements.

7. There is no funding allocated during the four-year period in IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS<sup>1</sup> to encourage modal shift, for example to change behaviours and improve cycling and pedestrian infrastructure.
8. The CS is not justified as it does not take account of proportionate evidence, especially in relation to modal shift assumptions. The New Evidence database is incomplete as it excludes several key Transport documents, especially those in relation to modal shift and the S106 schedules for the approved Ipswich Garden suburb developments which have not been made available to the Public in time to examine as part of this Consultation.
9. We are concerned that the two road bridges (and country park) may not be delivered in time (February 2022) to receive the £9.8m Housing Infrastructure Funding. If this is the case, then the CS is unsound unless IBC can confirm alternative funding will be available.
10. We are concerned that the CS is not completely positively prepared as it fails to fully assess transport infrastructure requirements, including walking and cycling infrastructure, especially in relation to timing of delivery (and as sewage infrastructure requirements).

### **Air Quality and the environment**

11. The CS is not consistent with national air quality policy as it fails to ensure compliance with legally binding limits. There needs to be a requirement to comply with these for the CS to be sound.
12. The CS needs to strengthen the commitment to Improve Air Quality as there has been no real improvement in Air Quality in Ipswich over the past decade with the number of AQMAs in Ipswich increasing.
13. There is no funding allocated during the 4-year period in IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS for improving air quality.
14. There is no Air Quality Assessment provided as part of this consultation. This needs to be completed urgently and needs to include assessments for the early years of planned developments, all construction-related traffic (including sewage infrastructure projects) and rail/sea traffic. It needs to examine the impacts of different levels of modal shift rather than assume the unsubstantiated, extremely high levels of modal shift assumed in the transport assessment will be delivered by 2026 and thereafter.
15. There is little point in undertaking an Air Quality Assessment in 2036 as the ban on non-electric vehicles will have been implemented. It is the early years of the CS where air quality is most likely to be worst. We believe that an earlier assessment than 2026 is therefore required e.g. 2023 and perhaps 2029/30 (prior to the ban on non-electric vehicles) rather than 2036 when there will be a significant number of electric vehicles.
16. At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency. The CS needs to be updated to incorporate this to be sound.
17. We strongly object to the re-designation of the Ipswich "green rim" to "green trails". This is in breach of DM13 and unsound.
18. The current situation regarding flood risk assessment within the CS is ambiguous and somewhat confused. This needs to be clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be sound and understood by residents.
19. A key problem with the Sustainability Appraisal, Habitats Assessment and Health Impact Assessment are that they simply assume that the CS will be fully implemented and that full funding for all the measures identified in the CS will be secured. There is no evidence that IBC (in conjunction with SCC) can deliver the substantial improvements in walking, cycling and bus infrastructure, improved road infrastructure and the unprecedented levels of modal shift

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<sup>1</sup> <https://democracy.ipswich.gov.uk/documents/s27023/C-19-19%20MTFP%20Appendix%201%20-Financial%20Strategies%20and%20Medium%20Term%20Financial%20Plan%202020-21%20Onwards.pdf>

required for the CS to be sound. IBC and SCC's track record in these areas is dire – what evidence is there that this will change?

20. The Sustainability Assessment is incomplete and underplays many key issues. It needs to fully assess air quality impacts including from rail and sea, the impacts of the additional road infrastructure required to prevent junctions reaching capacity , the proposed re-designation of the Green Rim, alternatives to building on Humber Doucy Lane (and that Suffolk Coastal no longer needs this land to meet its housing target), flood risk and the impacts of the new sewage infrastructure that will be required to deliver the CS. It especially needs to assess the robustness of the CS if the unprecedented levels of modal shift are not achieved.
21. The same issues relating to the Sustainability Appraisal apply to the Health Impact Assessment.
22. The Habitats Assessment also needs to take account of the same issues.

### **Other**

23. There are still no firm proposals for new sewage infrastructure that is required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables.
24. The proposal to allow development in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road is not justified and therefore unsound. Land in the centre of Ipswich earmarked for expanded retail and car parking (which we believe is surplus to requirements), should be used for new homes instead. There is no SA of this viable alternative.
25. The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector<sup>2</sup> from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756). Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) it had included in its final draft plan<sup>3</sup> (paragraph 12.209). The SA fails to assess this.
26. Specific Objectives are required to ensure delivery of key aspects of the CS such as improving transport infrastructure, improving air quality, delivering modal shift and improving accessibility are required. These need to be monitored and reported on to ensure the CS is effective.

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<sup>2</sup> [https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk\\_Coastal\\_Local\\_Plan\\_Post\\_hearings\\_letter.pdf](https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk_Coastal_Local_Plan_Post_hearings_letter.pdf)

<sup>3</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

## **Consultation Statement Ipswich Borough Council Local Plan Review Preferred Options**

### **January - March 2019**

We are concerned that our comments on CS5 and CS20 in relation to the transport modelling and modal shift (and associated air quality issues) have not been adequately considered. IBC appears to be adopting the approach that SCC's Transport Mitigation Strategy for the Ipswich Strategic Policy Area (IPSA)<sup>4</sup> will totally resolve all the traffic issues and fully deliver the required levels of modal shift for the CS to be sound, without substantiating this with any evidence that it will. Until such evidence is provided the CS cannot be considered effective or justified. It is particularly disappointing that the Transport Mitigation Strategy and other relevant modal shift documents have not been included in the Evidence Base. We agree that extremely high modal shift levels will be needed but believe that the new infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary for the CS to be sound. The level of funding needed to deliver this is massively under-estimated. There is also a significant shortfall in guaranteed funding for the insufficient measures identified in the Plan. IBC has yet to respond to these concerns.

### **Para 5.25**

Improving air quality in the increasing number of Ipswich AQMAs (now five) needs to be added as a key challenge as IBC is legally required to reduce pollution levels to legally binding limits and has failed to do so; there have been no material improvements to air quality and IBC is non-compliant with its CS in this respect. The planned growth levels for Ipswich will further challenge this requirement.

Given the high levels of modal shift required, IBC should be “delivering high levels of modal shift” rather than just “guiding as many trips as possible to sustainable modes”. The current draft underestimates the difficulty and importance of the task.

Meeting the Climate Emergency also needs to be added as a key challenge as Ipswich Borough Council has committed to tackling this issue. Not to include it would be unsound.

**Para 5.26 Table 2** – for ease of reference we have included all our comments on flood risk below, but these should be considered for all other references of flood risk in the CS.

This states that *“In addition, as part of the final draft Local Plan, a refresh is being prepared of the Ipswich Strategic Flood Risk Assessment (SFRA).”* Paragraph 6.1.6 then states that *“The Council’s Level 2 Strategic Flood Risk Assessment (SFRA) was revised in 2019. It provides guidance on residual flood risk both for the situation before and after completion of the flood barrier. The SFRA also suggests a framework for safe development. The safety framework is detailed in the Council’s Development and Flood Risk SPD (September 2013) which is in the process of being updated”*. How can a ‘framework’ developed in a document (SFRA) dated 2019 be detailed in an SPD dated 2013? It is not clear which Safety Framework applies to the CS.

However, the IBC FRA webpage<sup>5</sup> only references the 2011 SFRA version and does not show the 2019 version referenced above. We also note that the Local Plan New Evidence database includes a draft 2020 SFRA as well. It is not clear when or if this has been adopted. The IBC website also states that

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<sup>4</sup> <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/IPSA-Transport-Mitigation-v13F.pdf>

<sup>5</sup> <https://www.ipswich.gov.uk/content/strategic-flood-risk-assessment-sfra>

the Flood Risk SPD “*was first updated in May 2014 and has subsequently been updated in January 2016 to reflect changes to national and local policy and guidance*<sup>6</sup>.”

Paragraph 8.45 states “*On flood risk, it concludes that an updated Strategic Flood Risk Assessment is needed to model the boundaries of Flood Zones 3a and b; drainage strategies should be prepared for all sites; and the sequential and exception tests need to be applied to all sites in flood zones 2 and 3.*” It is not clear if the draft 2020 SFRA meets this requirement. The paragraph then goes onto state that “*Further guidance is contained in the Development and Flood Risk Supplementary Planning Document 2016*”. Clearly the 2016 SPD cannot possibly adequately reflect the draft 2020 SFRA.

Paragraph 8.46 states that “*the Ipswich Surface Water Management Plan*<sup>7</sup> was produced in [June] 2012 and is currently under review”. This is clearly obsolete and fails to take account of climate change. Under the NPPF hierarchy for managing flood risk, this is the key document/means of controlling flood risk. This review needs to be completed urgently and incorporated into the CS for it to be sound. We are concerned that IBC no longer has a Drainage Team/Officer that can undertake this important work and the loss of such expertise leaves Ipswich and its residents at greater risk of flooding.

Paragraph 8.225 states that “*Part C of this document includes policies relating to flooding to reflect the NPPF and the detailed findings of the Ipswich Strategic Flood Risk Assessment*”. But it does not reference which SFRA version it relates to. IBC needs to confirm that this is compliant with the draft SFRA 2020

Policy DM4 states that “*it [development] will be adequately protected from flooding in accordance with adopted standards of the Suffolk Flood Risk Management Strategy*<sup>8</sup>;” However, the document was produced in 2016 so doesn’t include the full risk of flooding from climate change so there is no assurance that development will be adequately protected.

Suffolk County Council’s Preliminary Flood Risk Assessment (PFRA) was published in 2011<sup>9</sup> and had a 3 page addendum<sup>10</sup> in 2017. A Preliminary Flood Risk Assessment (PFRA) is an assessment of floods that have taken place in the past and floods that could take place in the future. It considers flooding from surface water runoff, groundwater and ordinary watercourses. This is also therefore out of date and will not fully take account of climate change. We believe an update is required to ensure the CS is sound.

In the 2017 Addendum, SCC used a national data set to predict flood risk, but these do not include climate change allowance output, so SCC have projected the potential number of properties at risk for the 0.5% AEP for the PFRA. The results show that Ipswich is the area at greatest flood risk and has been identified as a Flood risk area (FRA) for the purposes of the Flood Risk Regulations (2009) second planning cycle. The Addendum states that “*To improve SCC understanding of climate change in priority areas, local modelling updates will assess the impact of climate change.*” It is not clear

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<sup>6</sup> <https://www.ipswich.gov.uk/content/development-and-flood-risk-spd>

<sup>7</sup> <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Surface-Water-Management-Plans/Ipswich-Flood-Risk-Management-Strategy-v12.pdf>

<sup>8</sup> <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/2018-Strategy-Documents/2016-04-Suffolk-Flood-Risk-Management-Strategy-v12.pdf>

<sup>9</sup> <https://www.suffolk.gov.uk/assets/Roads-and-transport/Flooding-and-drainage/SUFFOLK-PFRA-REPORT-FINAL.pdf>

<sup>10</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/698246/PFRA\\_Suffolk\\_County\\_Council\\_2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698246/PFRA_Suffolk_County_Council_2017.pdf)

whether this modelling has been done or how it has been included in the CS. Clearly this needs to be incorporated into the CS for the CS to be sound.

The current situation regarding flood risk assessment within the CS is ambiguous and confusing and makes the CS flood risk situation impossible to understand for the general public. This needs to be clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be understood by residents and for it to be sound. Given the current terrible flooding and that Ipswich is an FRA, this is a key issue that needs correcting.

### **Para 6.7**

The Vision needs to include an improvement in air quality levels and compliance with legally binding targets that are currently exceeded. IBC should have a Strategic Policy to comply with legally binding air quality targets and eradicate AQMAs within Ipswich for the benefit and protection of residents. The Climate Emergency also needs to be recognised in the Vision (please see our comments under CS1).

### **Objective 6.8.4**

This Objective needs to be strengthened to recognise the Climate Emergency for the CS to be sound (please see our comments under CS1).

### **Objective 6.8 5**

It is not clear what the 2004 levels are or how progress against these will be measured; 2004 emissions levels should be included in the CS for completeness so that the target is clear. For example, do 2004 measuring locations correspond with the current measuring locations and if not, how will IBC determine whether levels have returned to 2004? Furthermore, it is not clear when IBC aim to return to 2004 levels. This needs to be done as a matter of urgency and should not be left to 2036 as would be possible under the current Plan, by which time many more Ipswich residents will have died prematurely. IBC needs to comply with legally binding targets otherwise its CS is unsound.

### **Objective 6.8 6**

IBC has decided to remove its previous Objective to achieve modal shift of 15% by 2031 in the current Local Plan and needs to be asked why it has done this given this is still required for the CS to be sound. SCC Transport modelling (which we discuss later) confirms that major modal shift is required to deliver the CS (e.g. c15.5% by 2026 for existing journeys). Given the importance of achieving high levels of modal shift to deliver the Plan, it is imperative that a modal shift target for 2026 is included for the CS to be sound. IBC needs to explain why it no longer thinks having a modal shift target is important.

Ipswich CS Authority Monitoring Report 13, 2017/18 June 2019 fails to adequately report back on the current Objective 6 f. TARGET: To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031. Simply stating "*The Travel Ipswich measures have now been implemented. This target will be reviewed through the Ipswich Local Plan review.*" We believe the reason that the target has not been reported on is that little or no progress has been made and the target has been removed because IBC knows it cannot be achieved. IBC needs to report the modal shift levels achieved through Travel Ipswich (formerly known as Ipswich – Transport Fit for the 21<sup>st</sup> Century) as this will indicate what levels of modal shift can be achieved in Ipswich.

We also note that Appendix5, pg 55 states “*The 2018 Travel to Work survey ran from the 7th May to 29th June 2018, outside the 2017/18 monitoring period. The 2018 results show that driving (single occupant and car share) remains the most frequently used mode of travel at 64.7% in 2018, an increase from 62.6% in 2017. The percentage of those travelling as a single occupant has risen compared to last year and currently stands at 62.6%, 3.5% higher than in 2017.*” This illustrates how difficult the required levels of modal switching will be to achieve, without which the CS is clearly unsound.

We believe IBC has failed to make any progress on the modal shift target of 15% by 2031. It clearly needs to provide evidence that it can deliver the required modal shift levels identified by SCC (e.g. c15.5% by 2026 for existing journeys) for the CS to be sound. If not, the CS needs to be revised accordingly to be sound.

IBS states that “*Additional east-west highway capacity could be provided within the plan period*” and needs to illustrate what it means by this and whether such capacity is required for the CS to be sound.

Paragraph 8.19, which states “*In addition to the integrated transport solutions, including bus network improvements within the town and increased capacity of the local rail offering, a northern route around Ipswich is expected to be needed to enable growth in the longer term.*” Ipswich Borough Council states support for such a route. We would like to draw attention to the article in the Ipswich Star (27 February 2019<sup>11</sup>) where the leader of Ipswich Borough Council, David Ellesmere, is quoted as saying “*A northern bypass is a priority infrastructure project for Ipswich*”. A position that was repeated in the East Anglian Daily Times Article<sup>12</sup> published on 22/02/2020 “It remains our position that the best solution would be the construction of the inner route of the northern bypass [to ease traffic problems in Ipswich]. Both the previous Labour and current Conservative Ipswich MPs have also argued for a northern route as a priority for Ipswich. This paragraph and the CS need to be updated to take account of the decision that the northern route will NOT be progressed further by SCC. Ipswich Borough Council needs to explain why its elected leader clearly believes that Ipswich cannot cope with existing volumes of traffic and that it is sound for the CS to increase traffic further. The Local Plan also needs to recognise that Suffolk County Council is also concerned about the ability for Ipswich to manage the existing volumes of traffic and announced on 18 February 2020 that it is setting up a taskforce to look at new ways of tackling the town's traffic problems. In response to the creation of the Suffolk County Council taskforce to improve Ipswich traffic David Ellesmere is quoted in the East Anglian Daily Times as demanding “*a new link road connecting Europa Way with Bramford Road to alleviate traffic pressures, and work to explore a new road link connecting London Road, Hadleigh Road and Sproughton Road*”.

We agree with the leader of Ipswich Borough Council and its local MP that some form of northern route is still required for IBC to deliver its targets in a sound manner. The SCC consultation exercise shows that many Ipswich residents share this view. Unless there is a huge change in public attitudes and behaviour plus substantial investment in other means of sustainable travel, improving the existing road infrastructure, including new technology, homeworking incentives, off-peak travel pricing incentives, regulatory instruments etc, a northern route is required to deliver the Plan. Currently IBC has insufficient firm proposals or funding to deliver the required 2026 modal shifting target and subsequent modal shift levels throughout the CS period. The CS is therefore unsound as it lacks a credible transport solution that would support the proposed levels of growth.

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<sup>11</sup> <https://www.ipswichstar.co.uk/news/ipswich-northern-bypass-latest-1-5908955>

<sup>12</sup> <https://www.eadt.co.uk/news/ellesemere-on-travel-taskforce-1-6527021>

**Para 6.17** - this should be considered as our representation for this site in respect of the consultation on the associated Site Allocations & Policies.

We challenge the need for future development after 2031 in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road, which is no longer required by Suffolk Coastal to meet its housing target as this has been reduced substantially by the Planning Inspector:

1. **The Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018**  
Section 4.3 Land Northeast of Ipswich IP2 (Suffolk Coastal) recognises the sensitivity of the open land between the edge of suburban Ipswich and the villages of Westerfield and Rushmere and that the area forms an important corridor of land. It states that "opportunities lie in the strengthening of landscape structure, softening of the urban edge and reinforcement and creation of corridors which penetrate the urban area". It concludes that the area is "sensitive to development" and "care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town". These comments will clearly also apply to the open land within the Ipswich boundary. Even more so as the land is nearest the edge of suburban Ipswich and there is substantially less open land within the Ipswich boundary than Suffolk Coastal. We also note that this report was produced before the Ipswich draft CS proposal. Therefore, it does not consider the impacts of building on the open countryside within the Ipswich boundary, which will increase the sensitivity of the Land Northeast of Ipswich IP2 as described in this report. In our view, this land is too important and sensitive to be built on, especially as it will result in the need for an additional primary school, which has additional traffic implications.
2. We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new homes. Town centre homes are likely to have a far lower impact on traffic congestion and air quality than on the outskirts of Ipswich. We believe that there are opportunities to convert some of the existing excess town centre retail property into new homes. This approach should be used instead of building on at the northern end of Humber Doucy Lane and Tuddenham Road, which will add to traffic congestion into the town centre and along Valley/Rd/Colchester Rd etc. We note that Ipswich Central is also advocating an increase to the number of homes in the town centre<sup>13</sup>. This will help improve the town centre and the night-time economy, reduce traffic into the centre town (compared to other new build sites), facilitate modal shift and improve air quality. Why has this option not been considered by IBC?
3. We believe that the Parking Strategy over-estimates the parking demand, and hence the required land, for town centre parking and that this brownfield land would be better used for housing rather than the previously designated countryside at Humber Doucy Lane.
4. Traffic modelling shows that traffic from the development will further increase traffic at junctions that are already over-capacity without any road infrastructure projects proposed to rectify this forecast over-capacity.
5. The allocation of this land for housing is in breach of Policy CS16 regarding the protection and enhancement of green corridors and the CS "Green Rim" (regardless of the land having been designated as countryside). In our view, this is why Ipswich Borough Council wants to re-designate the green rim as bike and cycle trails without any justification and a distinct lack of cycle trails in the "green trails". We discuss this in detail in our comments to Chapter 7, which should also be considered here.
6. The allocation of this land for housing is in breach of the current CS. POLICY DM8: The Natural Environment POLICY DM10: Green Corridors. It is also counter to the principles of POLICY DM11: Countryside and should remain classified as part of the Green Rim. It is also

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<sup>13</sup> <https://www.ipswichstar.co.uk/news/ipswich-needs-4-000-new-homes-1-6516012>

effectively non-compliant with Paragraph 8.80 as it is inconceivable there will be net gains in biodiversity and green infrastructure by building on the green rim.

7. The allocation of this land for housing is in breach of the current CS in relation to the corresponding Policies and Diagram 3 The Ipswich Core Diagram where it is designated as Green Rim. IBC has not provided enough evidence to justify this change of classification from countryside.
8. The North East Character Study recognises the benefits of this site as “a rural buffer” as open fields/countryside to urban Ipswich. Given the lack of such land in Ipswich, it is too important to be lost.
9. The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector<sup>14</sup> from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756) i.e. a reduction of 720 homes over the Plan period. Clearly Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) that it had included in its final draft plan<sup>15</sup> (paragraph 12.209) and the allocation of this land is therefore not sound.

Regardless, there should be no development of this land until the completion of the IGS. This needs to be made clear in the CS. For the CS to be effective, the Sustainability Appraisal needs to fully assess the implications on building on this site and whether delivering more homes in the town centre instead of retail expansion might be a more sustainable option.

## **CHAPTER 7: The Key Diagram** (and all other references to the green rim/trail)

We strongly disagree with the proposed change to replace “green rim” with “green trail” in (v) The ecological network, green corridor and green rim approach to strategic green infrastructure (policy CS16). The proposed change to the green rim has not been assessed by the Habitats Regulations Assessment (HRA) and needs to be included in the HRA accordingly.

The existing green rim is an asset and should be protected by adding it to Policy CS4, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it and hence destroy it.

The Ipswich Local Plan – Regulation 19 draft presented at the Council Meeting on 8<sup>th</sup> January 2020 states, in the last paragraph of Section 2.47 The Development Management, that “*There has been some confusion arising from the Preferred Options consultation responses on the purpose of the ‘green rim’, which are principally orbital routes for walking and cycling around the periphery of the Borough although it is acknowledged that they are important routes for biodiversity and the wider ecological network. It is suggested that these be renamed as ‘green trails’ which shows that these areas are also connected with walking and cycling.*”

It is our view that the Council in its paper is mis-leading Councillors as the concept of corridors and the green rim was for the corridors to provide access on foot or by cycle to the countryside surrounding Ipswich. That countryside then became known as the green rim and the intention was for the green rim to be protected from development. We note that in subsequent CSs the green rim has been considerably reduced in size, which demonstrates the Council’s lack of commitment to protecting open space and improving biodiversity in its own Plans. The change in definition is effectively non-compliant with policy DM8.

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<sup>14</sup> [https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk\\_Coastal\\_Local\\_Plan\\_Post\\_hearings\\_letter.pdf](https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk_Coastal_Local_Plan_Post_hearings_letter.pdf)

<sup>15</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

In our view, the Council is doing this so that it can bring forward land around Humber Doucy Lane, which has previously been designated as countryside, and then as part of the green rim, for development in the revised draft of the CS by removing the protection that it currently has. If the Council wants to do this then it should be clear and transparent that it proposes to build on land previously designated as countryside/green rim rather than by deviously trying to re-designate the land as a pedestrian/cycle green trail (which was never the intention of previous CSs). We believe that there are other brownfield sites in Ipswich that could be used instead.

In Appendix 1, we illustrate the history of the green rim/corridors in various drafts of the CS below and include a comparison of actual cycle routes to the revised green trails demonstrating that it is the Council that is “confused” about the original purpose of the green rim. We also note that there is no mention of the Green Rim (or Green Trail) being used for cycling in the Ipswich Cycling Strategy<sup>16</sup> adopted in March 2016 as part of the CS.

## **Chapter 8 Scale and location of growth**

We have argued for many years that previous homes and employment targets set by Ipswich Borough Council were too high, unrealistic and based upon flawed evidence. It is now clear that previous Plans were unsound and by their very nature were therefore sub-optimal for Ipswich as we argued strongly at the time. It is disappointing that Ipswich Borough Council has taken so long to accept this. We believe the proposed lower targets are more realistic. We agree with IBC that it has established a 5-year land supply of 5.06 years including a 20% buffer or contingency in the 5-year supply.

## **Policy ISPA2 Strategic Infrastructure Priorities**

This needs to include the following highway schemes that SCC assumes will proceed in Ipswich in its ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2 along with the dates they are required by. Without these being implemented the modelling work, and hence the CS is unsound.

1. Bixley Road / Heath Road / Foxhall Road Additional lane NB for Bixley Road / Additional lane SB for Heath Road
2. Nacton Road / Maryon Road Turn WB Nacton to two lanes, and EB Nacton to one lane
3. Upper Orwell Street Changed to one-way southbound from St Helen's Street
4. St Helen's Street / Bond Street Bus lane removal (we question how this will improve bus services?)
5. Ipswich Radial Corridor Route improvements - Felixstowe Road. Capacity increase to Felixstowe Road & Bixley Road arms of roundabout with A1156 Bucklesham Road. Capacity increase at Bixley Road / Ashdown Way junction
6. Ipswich Garden Suburb – Henley Gate Two signalised junctions included as part of site access onto Henley Road
7. Ipswich Garden Suburb – Fonnereau Priority controlled junction included on Westerfield Road in relation to access
8. Ipswich Garden Suburb – Red Hill Farm Two priority-controlled junctions included on Westerfield Road, north and south of Fonnereau access junction
9. A1214 Valley Road / Westerfield Road Increased capacity modelled on A1214 approaches to roundabout due to flares
10. A1214 Valley Road / Tuddenham Road Increased capacity modelled on A1214 approaches to roundabout due to flares

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<sup>16</sup> [https://www.ipswich.gov.uk/sites/default/files/cycling\\_strategy\\_spd.pdf](https://www.ipswich.gov.uk/sites/default/files/cycling_strategy_spd.pdf)

11. Europa Way link road Link road between Sproughton Road and Bramford Road, extension of Europa Way with priority-controlled roundabouts
12. A1214 / Bell Lane Ban of right turn from A1214 onto Dr Watson Lane. Signalised junction of A1214 / Bell Lane changed to priority-controlled roundabout [we note this is not in Ipswich and appears to have been incorrectly grouped under Ipswich]

This list excludes improvements to the Henley Road/Dale Hall Lane junctions with Valley Road which are required to be delivered by Crest Nicholson after by occupation of the 299th home on its Henley Grange IGS site (as stated in the planning application Decision Notice). It needs to be confirmed whether this infrastructure project has been included and modelled accordingly. It needs to be added to the list of projects.

We support the inclusion of sewage infrastructure in ISPA2. We have argued for this for many years and its inclusion is long overdue. We believe specific reference to it being required for the delivery of the Ipswich Garden Suburb, which still has no agreed site-wide sewage infrastructure solution after over 10 years of planning for one.

#### **Policy IPSA4 and Paragraphs 8.24-8.26**

Please see comments on Paragraph 6.17. Paragraph 8.24 states that development will “*follow the delivery of the Ipswich Garden Suburb*”. We disagree on the need for this land to be developed, but if it is then it needs to be made clear throughout the CS document that this can only happen following the delivery of the IGS development, rather than “appropriately phased”. Without this stipulation it could detrimentally impact on demand for homes at the IGS leading to a stalled and incomplete development of the IGS for many years. It is premature to phase it with the IGS development rather than at the end of the IGS development.

#### **Policy CS1**

Sustainable Development needs to reflect the legal requirement to comply with Air Quality targets, as well as considering them elsewhere in the CS for the CS to be sound.

At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. This commitment will clearly impact on the CS and needs to be referenced here and in relation to other relevant policies e.g. DM1 and DM2 for the CS to be sound. This would be consistent with the Court of Appeal’s ruling on 27/02/20 that the government’s Heathrow’s expansion decision was unlawful because it did not take climate commitments into account.

#### **Policy CS4, Policy CS17 and DM8**

The existing green rim is an asset and should be protected, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it (see above). It should be included in CS4 accordingly for the CS to be sound.

We have some concern that IBC may not be providing enough recreational mitigation for its RAMSAR sites. It is not clear what RAMS S106 payments (agreed on 30/01/20) have been agreed with CBRE and Crest IGS sites as the S106 have not been made publicly available by IBC with its Decision Notice in February 2020 on granting outline application approval.

The Suffolk Coast European Sites Recreational Disturbance Avoidance and Mitigation Strategy

## Supplementary Planning Document (SPD) 2019

This was approved by the Executive on 7th January 2020, which implies the S106 agreements should include RAMS mitigation payments as they were agreed after the SPD was approved by the Executive.

We note that Paragraph 2.4 states "*It should be noted that some residential schemes, particularly those located close to a European Site boundary or large scale developments, are likely to need to provide additional mitigation measures (in addition to the tariff) such as Suitable Alternative Natural Green Space (SANGS) or green infrastructure measures. This would need to be assessed through a project level Habitats Regulations Assessment (HRA) (including Appropriate Assessment).*" Therefore, it would appear that the delivery of the Country Park is therefore an additional requirement to the RAMS tariffs.

However, IBC did not request any S106 contributions from either CREST or CBRE for any of their homes on the IGS for recreational mitigation when the outline application was approved subject a number of conditions at the Planning & Development Committee Wednesday 4th April 2018  
CREST - Para 5.16 of <https://democracy.ipswich.gov.uk/documents/s20697/Item%2001.pdf> other than £7.5k HRA for monitoring  
CBRE - Section 10 of <https://democracy.ipswich.gov.uk/documents/s20700/Item%2002.pdf> other than £7.5k HRA for monitoring

The SPD also states

### *3.2 What types of application does this apply to?*

*The Suffolk Coast RAMS tariff applies to all full applications, outline applications, hybrid applications, permitted development, and reserved matters applications where no contribution was made at the outline application or hybrid application stage.*

*Sites that already have planning permission will not be required to pay any additional mitigation sum, unless they are resubmitted for consideration.*

*3.3 The Suffolk Coast RAMS contribution is payable in addition to any Community Infrastructure Levy (CIL) liability and/or any other S106 or S278 contributions for other types of contribution and there may be other site-specific mitigation requirements in respect of European Sites and ecology.*

If there are no RAMS tariffs included in the S106 agreements this could be in breach of this SPD, Policy CS4, CS17 and Policy DM31 The Natural Environment of the current Ipswich CS. It also means the new CS would be unsound in relation to CS4 CS17 and DM 8 The Natural Environment as there is no means of funding the required. We believe further examination of the issue is required to provide confidence that the CS is sound in relation to this issue.

## Policy CS5 Improving Accessibility

States that the Council will work with the Highway Authority including through the Local Transport Plan to manage travel demand in Ipswich and maximise sustainable transport solutions and in doing so will prioritise the development of an integrated cycle network. During the duration of the current CS and despite the agreement of the Cycling SPD, we have seen no improvements to the cycle network. Indeed, the only major changes that we are aware of are:

- The removal of the dedicated cycle lane on Felixstowe Road out of Ipswich towards Sainsburys.
- The construction of steps on the Cornhill effectively blocks off the previous direct cycle route between Lloyds Avenue and Princes Street. This was the only cross-town cycle route that did

not involve the use of dangerous counter-flow cycle lanes (Northgate Street and Museum Street) in the town centre. Neither of these counter-flow cycle lanes meet cycle lane guidelines<sup>17</sup>.

Both these changes, especially the town centre one, result in a more segregated cycle network and will deter cyclists rather than encourage them. We also note that the cycle route along the Christchurch Park Bridleway remains in a dangerous state of repair since the current CS was approved. This shows a distinct lack of commitment to even maintaining the existing cycle network.

We also note that much of the Ipswich cycling infrastructure is sub-standard and fails to comply with recommended minimum standards for cycle lane width for both dedicated cycle lanes and shared pedestrian/cycle routes. The latter acts as a barrier to both walking and cycling. The required levels of modal shift will not be delivered with such sub-standard infrastructure.

Paragraph 33 of the Transport Topic paper states that "*There has also been a variety of cycling and walking initiatives built around the balanced transport plan for Ipswich*" but fails to provide any evidence of this. The Council needs to detail the initiatives delivered by the Council in the last few years since the adoption of the current Core Strategy and the Cycling Strategy Supplementary Planning Document in March 2016 and the current CS in February 2017 and advise on the level of modal shift has been achieved by them. We have not been able to find any evidence of the levels of modal shift achieved by these initiatives (nor what the specific initiatives actually are). In relation to the provision of cycling infrastructure in the current CS, there seems to have been no progress in delivering the requirements of:

- CS5 Improving Accessibility Enables access across town safely and conveniently by foot and by bicycle - work with the Highway Authority through the Local Transport Plan prioritise the development of an integrated cycle network.
- CS16 Green infrastructure, Sport and Recreation Strengthens ecological networks that link inner and outer parts of the Borough by providing walking and cycling routes.
- CS20 Key Transport Proposals Seeks improved cycling and walking routes between key nodes.
- SP15 Improving Pedestrian and Cycle Routes Support improvements to pedestrian and cycle routes within the IP-One area and linking the town centre to residential areas and beyond.

The level of achievement by IBC will help determine how effective the CS is likely to be in delivering its accessibility and modal shift objectives and whether it is sound in these respects.

The SUFFOLK COUNTY COUNCIL Draft Local Cycling & Walking Infrastructure Plan (dated 15/03/2019 presented at Suffolk Cabinet 20/January 2020)

This identifies the requirements and options for planning of future opportunities to make improvements to the cycling and walking network. We are disappointed that this document has not been included by IBC in the Evidence Base as it clearly shows the poor existing walking and cycling infrastructure in Ipswich. The draft LCWIP assesses a number of corridors in Ipswich but does not include any actions or funding to improve these. The corridors are assessed using WRAT and CLOS

<sup>17</sup> The desirable minimum width of any contraflow lane is 2m. Where space is constrained it may be reduced to an absolute minimum of 1.5m. The width of the with-flow traffic lane may be as little as 2.5m where there are low volumes of heavy goods vehicles and the servicing needs of shops and other premises are met by off-street loading or other means. The preferred minimum width is 3m as this is less likely to cause with-flow traffic to encroach upon the cycle lane. Cycling England A.06 Contra-Flow Cycling.

assessment tools.

As part of the Welsh Active Travel Design Guidance a Walking Route Audit Tool (WRAT) was developed to assist Local Authorities with the auditing of walking routes. The auditing methodology targets the five core design outcomes for pedestrian infrastructure, which are similar to those for cycling. These are: • attractiveness • comfort • directness • safety • coherence. Each design outcome has several sub-categories that are each scored 0-2 with a score of 70% (28/40) being normally regarded as the minimum provision overall.

CLOS (cycle level of service) scores Cycling Level of Service is an audit tool developed by Transport for London. It is designed to assess the quality of cycling provision in existing (and proposed) schemes, with a final score out of 100. Good (Dutch-quality) schemes should be scoring between 70 and 80 out of 100.

In order to achieve the high targets of modal shift then, the key corridors should exceed the minimum standards of good design. However, it is clear from the assessments below that the existing walking and cycling infrastructure in Ipswich is massively sub-standard and without major improvements there is absolutely no chance of achieving the modal shift targets required and hence the CS is unsound in respect of Policy CS5 and subsequently CS20 Transport and DM3 Air Quality.

| Corridor                   | WRAT  | CLOS                                                                                                                             |
|----------------------------|-------|----------------------------------------------------------------------------------------------------------------------------------|
| Minimum level required     | 28    | 70                                                                                                                               |
| London Rd / Hadleigh Rd    | 27.2  | 58                                                                                                                               |
| Wherstead Rd               | 24.4  | 32.6                                                                                                                             |
| Henley Rd / Westerfield Rd | 24.7  | 37.2                                                                                                                             |
| Birkfield Drive            | 18.25 | 41.5                                                                                                                             |
| Hawthorn Drive             | 19.5  | 30.7                                                                                                                             |
| Inner orbital              | 31    | 45 estimated from parts that can be scored<br>unable to provide average score as some parts have no cycling or walking provision |
| Gipping River Path         | 20.6  | 44.3                                                                                                                             |
| Woodbridge Rd / Spring Rd  | 28.6  | 42.3                                                                                                                             |
| Nacton Rd / Landseer Rd    | 27.8  | 41.4                                                                                                                             |

It should also be noted that the assessments are based on the most suitable route, rather than routes walkers and cyclists might actually use so these scores will be higher than what is will be experienced on average. Clearly cycling and walking in Ipswich is currently an unattractive, unsafe, incoherent, uncomfortable experience that is also non-directional.

The Transport Modelling, which we will discuss later, includes extremely challenging modal shift assumptions. Unless IBC can provide evidence of sufficient funding and plans in place to improve the ineffective cycling network the required levels of modal shift cannot possibly be achieved, and the CS cannot be found to be sound.

We also note that Ipswich Buses, operated by IBC, continues to use the outdated approach of having bus routes that just go into town rather than establishing radial routes such as along the A1214/Heath Rd from ASDA/Whitehouse, past the hospital, to Futura Park/Ransomes/Havens. Bus route 2 currently stops at the hospital and could easily be extended to the ASDA/Whitehouse area. Such an approach would provide a more direct quicker route for many people and have the advantage of avoiding the town centre AQMAs. We would like to see the CS Preferred Options include a requirement on IBC to assess and test the viability of such bus routes to Improve

Accessibility and help contribute to modal shift. Substantial investment in the Ipswich bus network is required, including the expansion of the Ipswich Park and Ride network.

#### **IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS<sup>18</sup>**

This Financial Plan covers up to 2023/24 and was approved at Council on 19/02/2020. Paragraph 32 identifies IBC's top ten projects for this period, which includes "*providing high quality multi-story and surface car parking*". However, there is no money allocated over the four-year period to improving air quality, delivering modal shift or improving cycle and pedestrian infrastructure (i.e. to improve accessibility) despite the CS being dependent on achieving 15% modal shift and IBC being in breach of legally binding air quality limits. There is not even any mention of 'modal shift', 'air quality', 'cycling', 'walking', 'traffic' or 'sustainable travel' in the 98 page document, which would appear to illustrate the lack of commitment of IBC to invest in improving these areas. IBC is clearly prioritising encouraging people to drive into the town centre rather than use more sustainable means. The CS is clearly not effective as IBC has not allocated any funding towards delivering modal shift or improving air quality.

#### **Paragraph 8.97 and Policy C20 e) reference to the [Car] Parking Strategy and Plan**

It is not clear if the Ipswich Parking Strategy as drafted by WYG Transport Planning dated March 2019 has actually been approved by the IBC Executive. The IBC website Decision List shows a decision by the Executive was due on 29<sup>th</sup> October 2019, but the Strategy was not on the agenda. It now seems to have disappeared from the Decision List without a decision being made. IBC needs to detail the current situation with the Parking Strategy.

Paragraph 2.4.6 states that the Strategy is based on 12,500 additional jobs target 2011-2031 on 35 hectares whilst the proposed target is for approximately 9,500 jobs on 23.5 hectares by 2036 – a substantial reduction. Paragraph 2.4.4 states that it is based on 8,840 new dwellings by 2036 – the new target is 8,010. The new targets therefore render the Strategy obsolete. With the reduction in these targets, especially new jobs, it is logical to assume there will be a reduced requirement in land for car parking. We believe this brownfield land would be better used for housing before any development of the Humber Doucy Lane site. The CS is unsound in allocating the Humber Doucy Lane site for housing ahead of excess brownfield car parking sites. As shown in its FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS, IBC is prioritising improving town centre car parking and encouraging car journeys into town ahead of funding the encouragement of more sustainable forms of transport. This is in breach of the proposed CS

At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. The Car Parking Strategy drafted in March 2019 needs to take account of this, especially given the Council operates many car parks in Ipswich, for the CS to be sound. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

#### **Policy CS10 Ipswich Garden Suburb**

<sup>18</sup> <https://democracy.ipswich.gov.uk/documents/s27023/C-19-19%20MTFP%20Appendix%201%20-%20Financial%20Strategies%20and%20Medium%20Term%20Financial%20Plan%202020-21%20Onwards.pdf>

We have major concerns on the ability of the road network to cope with the additional traffic from the IGS without some form of northern relief road.

We are pleased that IBC secured £9.8m from the Housing Infrastructure Fund for the country park and the two road bridges over the railway. We believe this money is required to be committed by March 2022 (following an extension to the original date of March 2021). If this is the case, we are concerned that this critical infrastructure may not be delivered in time to secure the funding as work is yet to start on-site. We are particularly concerned that the relevant Decision Notices granting Outline Planning Permission for the Crest Nicholson IGS development only requires the Vehicular Bridge to be delivered upon the delivery of 699 homes. Clearly it is impossible to build this number of homes before March 2022 although it may be possible to demonstrate "commitment" as required by the HIF. We are already concerned that the existing Henley Road bridge over the railway is not wide enough to allow cyclists, pedestrian and cars to pass safely yet there are no improvements planned for this bridge. Without the early delivery of the road/pedestrian bridge and associated links into town that avoid the Henley Rd rail bridge, there is no safe walking/cycling route from the Crest Henley Gate development into town and the CS would consequently be unsound.

The Section 106 agreements for the two approved IGS sites may well include measures to safeguard HIF funding, or provide for other means of securing the required funding. These are technical and complex documents that are difficult for the public to understand. We believe that IBC needs to provide evidence that this infrastructure will be delivered in time to secure the funding and that contingency measures are in place to secure alternative funding for this infrastructure for the CS to be considered sound. As we discuss later in our submission the delivery of the IGS road infrastructure problems needs to be compatible with the dates assumed in the SSC traffic modelling. Evidence needs to be provided this is the case, before the CS can be found to be sound.

We are pleased to see that S106 payments agreed for the two approved IGS sites include funding for improved off-site infrastructure such as improving the Bridleway, cycle routes and providing crossings on Valley Road and Park Road. However, the trigger points for these payments are split into three instalments, with the last one prior to occupation of 500 homes for the CBRE/Mersea site and 600 homes for the Crest Nicholson site. Unless funding is provided from elsewhere to deliver the offsite infrastructure earlier than these trigger point dates, the required levels of modal shift will not be achieved by 2026 as the required sustainable travel infrastructure around the IGS will be incomplete.

We note that the S106 payments schedule for Henley Gate requires Crest Nicholson to deliver the Smarter Choices Programme for homes between Norwich Road and Henley Road (bounded by Valley Road). However, this is not required to commence until occupation of the 500<sup>th</sup> home. Consequently, there will be no modal shift programme implemented for this area in time to deliver the 15% modal shift requirement that is assumed in the transport modelling by 2026. The CS is therefore unsound in this respect.

WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions January 2020

3.9 IPSWICH RESULTS SUMMARY show that even with the high levels of modal shift and new infrastructure many junctions will become unacceptably congested around the Ipswich Garden Suburb.

3.9.1. Several of the A1214 corridor junctions operate with an overall V/C greater than 85%.

- A1214 / Dale Hill Lane – approaching capacity in AM/PM peaks in 2036. [Although not stated we also note that this junction is approaching capacity in 2026.]

- A1214 / Henley Road – approaching capacity in 2036 AM/PM.
- A1214 / Westerfield Road – approaching capacity in 2036 AM/PM peaks.
- A1214 / Tuddenham Road – approaching capacity in AM peak in 2036.
- A1214 / Rushmere Road – approaching capacity 2036 AM/PM peaks.

However, previous modelling for both Application IP/16/00608/OUT Land North Of Railway And East Of, Henley Road, Crest Nicholson (see Paragraph 5.121) and Application IP/14/00638/OUTFL Land To South Of Railway Line, Westerfield Road, CBRE/Mersea Homes (see Paragraphs 5.69 and Paragraph 8.484) has shown that these junctions are already operating at or near capacity at peak times and will continue to do so. By applying a 15% modal shift reduction, the modelling is hiding the fact that Ipswich roads are already heavily congested with many roads already operating at capacity at peak times.

In addition, Figures 15 and 16 also illustrate the many links that reach capacity, most notably on most of the A1214 from the hospital to Bramford Rd and on surrounding roads around the Ipswich Garden Suburb. Further modelling of these junctions and links at capacity at Peak times and either side of the peaks, is required to assess the impacts throughout the day. If they remain congested for long periods, then clearly the CS cannot be found to be sound for Transport and Air Quality. The modelling work needs to identify when these junctions and links reach capacity and how congestion will be mitigated as evidence for the CS to be sound; there is a big difference with this happening in say 2027 or 2035 between the modelled periods or even before 2026 in some cases.

We are also concerned that the modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads such as Elsmere Road and Dale Hall Lane as well as Park Road, which are not designed for heavy traffic and have not been included in Air Quality Assessments. It is obvious that in 2026 air quality will be worsened on these roads, which is in breach of the CS and therefore unsound. We note that this level of excessive congestion is forecast even if high modal shift rates are achieved etc. We are also concerned that Air Quality limits will worsen between now and 2026 yet there is no assessment of this.

We note that the CBRE/Mersea planning application for the IGS assumed that the “flagship project” Ipswich – Transport Fit for the 21<sup>st</sup> Century (renamed Travel Ipswich) would reduce dependency on car by 15%, whilst the Crest application assumed 20% reduction for work, business and other activities. It is clear the current network is completely UNFIT for the 21<sup>st</sup> Century and without substantial additional investment than that proposed it will remain this way.

Despite the Cross-Boundary Water Cycle Study report<sup>19</sup> there remains a lack of understanding and detail on what new additional sewage infrastructure will be required or evidence that the sewage infrastructure required for the IGS can be delivered despite first requesting this almost 10 years ago. Anglian Water’s proposed strategy to upsize 330 metres length of sewer along Valley Road and provide 550 cubic metres of storage off-line storage under Valley Road solution was briefly mentioned in the outline planning application for the Mersea Homes outline planning application for Land To South Of Railway Line, Westerfield Road IP/14/00638/OUTFL. There is still no agreed solution despite the two IGS outline applications being approved in February 2020. We note that IBC has stipulated that “Prior to the submission of the first Reserved Matters application a Site Wide Foul and Surface Water Drainage Strategy which covers the entire development site.”

If sewage infrastructure cannot be provided at the right time and at the right price for the IGS (as a whole) then the IGS cannot be delivered in accordance with the Plan. The implications of the

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<sup>19</sup> [https://www.ipswich.gov.uk/sites/default/files/cross-boundary-water-cycle-study\\_jan\\_2019.pdf](https://www.ipswich.gov.uk/sites/default/files/cross-boundary-water-cycle-study_jan_2019.pdf)

construction of new sewage infrastructure on Ipswich need to be considered as part of the CS. For instance, providing a 550cubic metres sewage storage tank under Valley Road. will require its closure for many months and have a major detrimental impact on traffic and air quality in Ipswich. Sewage infrastructure requirements urgently need to be considered in Policy CS10 and included in the Infrastructure Table 8b. In our view, all off-line sewage storage should be provided on the IGS site to minimise traffic impacts and prevent the worsening of Air Quality in areas already exceeding legal limits in Ipswich.

The effectiveness of the CS to deliver both employment and homes growth including the IGS could be seriously undermined by the ongoing failure to properly assess the cumulative requirement of Ipswich for wastewater infrastructure over the CS period and plan for its provision. This remains a major failing of the CS making it unsound. We note that improvements to sewage infrastructure has been included in ISPA2 and it also needs to be included in relation to the IGS.

The potential impact of Sizewell C on the IGS and the CS has not been assessed in any form of sensitivity analysis. We have previously raised concerns of the impacts of increased rail freight for Sizewell C on the Ipswich – Westerfield stretch of the rail-line regarding air pollution, noise, operation of Westerfield level crossing and the proposed pedestrian bridge, which have been ignored. In its response to the latest consultation on Sizewell C<sup>20</sup>, we are pleased to see that IBC now shares these concerns, but still fails to assess the potential impacts in relation to the IGS and the CS. The potential impacts of Sizewell C as raised by IBC in its consultation response needs to be assessed in relation to the soundness of the CS preferred options through sensitivity analysis prior to a decision being made on whether it proceeds.

We believe the Council's estimate requirement for increased retail space in Ipswich town centre remains flawed and question the need to allocate part of the Westgate site and the Mint Quarter for retail. We have always argued that Ipswich Borough Council has been over-estimating retail demand (as with previous undeliverable homes and employment targets). We believe that less retail space will be required in future and that some of it should be reallocated for housing in preference to of green space at the northern end of Humber Doucy Lane and Tuddenham Road. As mentioned above we believe there will be less land required for car parking in and around the town centre and that this land should also be reallocated for housing ahead of the Humber Doucy Lane green space for the CS to be sound.

### **Policy CS16 Green Infrastructure, Sport and Recreation**

The proposed allocation of land for housing at the northern end of Humber Doucy Lane and Tuddenham Road is in breach of Policy CS16, e.g. in relation to the protection and enhancement of green corridors. The CS is therefore unsound.

### **POLICY CS17: Delivering Infrastructure**

We remain concerned that the proposed development of the Ipswich Garden Suburb without improved road infrastructure will severely impact on traffic congestion and air quality and adversely affect the quality of life of residents.

At a strategic level, the Water Cycle Study concludes that, based on the predicted housing growth in IBC and SCDC, it is anticipated that no works/ upgrades to the existing water recycling centre (WRC)

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<sup>20</sup><https://democracy.ipswich.gov.uk/documents/s23982/Item%2011%20Appendix%202%20Sizewell%20C%20Stage%203%20consultation%20IBC%20proposed%20response.pdf>

at Cliff Quay, other than those already planned by Anglian Water, are required. In terms of the Ipswich area, Anglian Water have the following three projects committed in their Water Recycling Long-Term Plan (2018)<sup>21</sup>

- Increased Water Recycling Centre Process Capacity - £12.3m cost – Scheduled for completion by 2032;
- Combined Sewage Overflow improvements - £11.96m cost – Scheduled for completion by 2027; and
- Increased Drainage Capacity through surface water management and upsizing (Defined Contingent Scheme) - £15.496m cost – Scheduled for completion by 2027.

This is clearly major infrastructure that is required for the delivery of the CS and should be included in the Infrastructure Table for the CS to be sound.

However, there is still no sewage infrastructure solution for the IGS or for the wider ISPA area despite it being a strategic priority (Policy ISPA2 Strategic Infrastructure Priorities i)). IBC needs to work far more closely with Anglian Water (and ISPA) to undertake a proper assessment of the cumulative homes and jobs expansion needs for strategic wastewater infrastructure in and around Ipswich to identify and cost key infrastructure deliverables. These need to be properly included in both CS Infrastructure Tables 8A and 8B as well. Without proper assessment and clear details of required sewage infrastructure to deliver the CS it is clearly unsound.

Please see our comments under Policy CS4 in relation to RAMSAR sites.

### **POLICY CS20: Key Transport Proposals**

It is worth noting that The Upper Orwell Crossings (the Wet Dock Crossings) will not proceed as there is insufficient funding (although new proposals for pedestrian crossings may be developed). SCC has also confirmed the Ipswich northern relief road will also not proceed. Without these major infrastructure projects, we believe increased congestion is likely to be severe and unacceptable without substantial investment in improving the existing road network, bus routes, rail services, dedicated cycle routes and major funding to support modal shift including funding to change the attitudes and behaviours of existing residents in relation to their transport modes. We believe that evidence needs to be provided to the Planning Inspector that substantial funding is available to deliver these improvements for the CS to be found to be sound.

We note that the traffic modelling does not assess the impacts of the potential construction of Sizewell C. Clearly this will have a major impact on traffic in Suffolk and Ipswich as recognised by IBC in its latest consultation response on Sizewell C proposals. As well as construction traffic itself, IBC agrees there will be an increase in the number of outward commuters from Ipswich/local areas and weekly commuters from further afield. The Transport assessment will need to be revised if Sizewell C proceeds.

We are pleased to see the WSP/ Suffolk County Council ISPA LOCAL PLAN MODELLING Methodology Report and the WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions – (January 2020) which updates previous January 2019 modelling work. However, we have major concerns with some of the key assumptions and outputs.

#### ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2

<sup>21</sup> [https://www.anglianwater.co.uk/\\_assets/media/water-recycling-long-term-plan.pdf](https://www.anglianwater.co.uk/_assets/media/water-recycling-long-term-plan.pdf)

As mentioned above this shows the future highway schemes which have been included in the forecast model networks within Ipswich which are all assumed to be in place by 2026 (we have added relevant references to IGS for clarity).

1. Bixley Road / Heath Road / Foxhall Road Additional lane NB for Bixley Road / Additional lane SB for Heath Road
2. Nacton Road / Maryon Road Turn WB Nacton to two lanes, and EB Nacton to one lane
3. Upper Orwell Street Changed to one-way southbound from St Helen's Street
4. St Helen's Street / Bond Street Bus lane removal [we question how this will improve bus services?]
5. Ipswich Radial Corridor Route improvements - Felixstowe Road. Capacity increase to Felixstowe Road & Bixley Road arms of roundabout with A1156 Bucklesham Road. Capacity increase at Bixley Road / Ashdown Way junction
6. Ipswich Garden Suburb – Henley Gate Two signalised junctions included as part of site access onto Henley Road [required as part of Crest Nicholson planning consent]
7. Ipswich Garden Suburb – Fonnereau Priority controlled junction included on Westerfield Road in relation to access [required as part of CBRE planning consent]
8. Ipswich Garden Suburb – Red Hill Farm Two priority-controlled junctions included on Westerfield Road, north and south of Fonnereau access junction [should be required as part of Red Hill planning consent when determined]
9. A1214 Valley Road / Westerfield Road Increased capacity modelled on A1214 approaches to roundabout due to flares [required before 599 homes occupied on Henley Gate site and 399 homes occupied on CBRE site as stated in the Decision Notices]
10. A1214 Valley Road / Tuddenham Road Increased capacity modelled on A1214 approaches to roundabout due to flares [required before occupation of 499 homes built on CBRE site as stated in the Decision Notice]
11. Europa Way link road Link road between Sproughton Road and Bramford Road, extension of Europa Way with priority-controlled roundabouts
12. A1214 / Bell Lane Ban of right turn from A1214 onto Dr Watson Lane. Signalised junction of A1214 / Bell Lane changed to priority-controlled roundabout

As noted above this list excludes improvements to the Henley Road/Dale Hall Lane junctions with Valley Road which are required by SCC from Crest Nicholson before 299 home are occupied on its IGS site (as stated in the Decision Notice). We note that the IGS Highways projects are not secured through S106 Agreements but will be provided by the Developers.

It is not clear whether these projects will be funded separately by SCC outside of the Transport Mitigation Programme or will be funded as part of the Transport Mitigation programme budget. It is unclear what completion dates for these infrastructure projects has been assumed in the modelling work and whether these assumptions are realistic and consistent with the trigger points placed on the IGS developers. Evidence needs to be provided of how each infrastructure project is intended to be funded and when it needs to be completed (as assumed in the modelling work). Currently there is too much ambiguity around these assumptions. We are especially concerned that A1214 junctions' improvements will not have been delivered by 2026 as assumed in the model. Without evidence that funding is available to deliver these 13 projects at the required time the CS is unsound.

As previously mentioned, these projects need to be included in the Infrastructure Tables. If any of the projects are not delivered by the required dates (which need to be identified in the modelling work so they can be tested to be sound) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needs to be provided to the Planning Inspector that funding is in place for these schemes compatible with the required delivery dates which need to be specified.

We note that rail freight from Felixstowe Docks is planned to increase by 50% and the number of trains by 30% with the upgrade of the rail line to Ipswich. This will result in a major increase in the number of closures of Westerfield level crossing and for a longer duration. Westerfield Road is the main access route to the IGS developments (other than the Henley Gate/Crest Nicholson development). Therefore, IBC needs to provide evidence that the SCC modelling assessment has included the impact of the increased closure frequency of Westerfield Road level crossing on traffic for the CS to be sound.

The following Tables show the trip generation reductions assumed in the modelling work, if these are not achieved the modelling is essentially unsound as will be the CS, as the transport network will not be able to cope with the traffic.

Table 5-1 – Trip generation reductions applied to existing road users

| Trip type                    | 0-2.5km | 2.5km-8.5km | 8.5km+ |
|------------------------------|---------|-------------|--------|
| Urban-urban                  | 30.00%  | 15.00%      | 5.00%  |
| Urban-rural<br>/ rural-urban | 5.00%   | 5.00%       | 5.00%  |
| Rural-rural                  | 0.00%   | 0.00%       | 0.00%  |

Table 5-2 - Trip generation reductions applied to development trip generations

| Land Use Type | Development Type | Small  | Medium | Large               |
|---------------|------------------|--------|--------|---------------------|
| Residential   | Town Centre      | 10.00% | 12.50% | 0.00% <sup>22</sup> |
| Residential   | Urban            | 5.00%  | 10.00% | 10.00%              |
| Residential   | Rural            | 2.00%  | 2.00%  | 2.00%               |
| Employment    | Town Centre      | 15.00% | 20.00% | 20.00%              |
| Employment    | Urban            | 10.00% | 15.00% | 15.00%              |
| Employment    | Rural            | 3.00%  | 3.00%  | 3.00%               |

We note that “*For any development from which trip rates and trip generation was determined from an existing Transport Assessment (i.e. greater than 500 dwellings / jobs), no trip generation reduction was applied as it was assumed a shift to sustainable travel was already accounted for within the Transport Assessment*”. We agree with this approach to prevent double counting.

We note that the assumed modal shift rates for the Crest Nicholson and CBRE/Mersea developments in their approved planning applications were 20% (from work, business and other activities, and 30% for travel to the secondary school) and 15% respectively.

Table 6-4 – 2026 Reduction in existing car trips

| Sector          | ID  | AM 2026 |      | PM 2026 |      |
|-----------------|-----|---------|------|---------|------|
|                 |     | Origin  | Dest | Origin  | Dest |
|                 | All | -9%     | -9%  | -10%    | -10% |
| Ipswich Central | 800 | -12%    | -15% | -15%    | -15% |
| Ipswich NW      | 801 | -13%    | -13% | -13%    | -14% |
| Ipswich NE      | 802 | -17%    | -17% | -17%    | -17% |
| Ipswich SE      | 803 | -15%    | -15% | -15%    | -16% |
| Ipswich SW      | 804 | -17%    | -14% | -15%    | -14% |

We note that the reduction in 2036 is very similar.

Tables 6-6 to 6-9 show reduction in trips from new road users for 2way trips in Ipswich these are

<sup>22</sup> 0% as there are no such developments

- 12% AM 2026
- 13% PM 2026
- 11% AN 2036
- 12% PM 2036

In Section 6.4 TOTAL TRIP MATRIX REDUCTION Tables 6-10 to 6-17 provides a comparison by vehicle type for the increase in overall county wide traffic for the various 2026/2036 AM/PM assignments with and without demand adjustment compared to the 2016 base. This information needs to be presented for Ipswich in order to properly assess the impacts of the CS and the feasibility of modal shift by vehicle type for Ipswich.

#### WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions January 2020

The Demand Reduction Impact for Ipswich is reported in Tables 7 - 14 as follows:

- 28% Reduction in PCU. Hours Delay (AM 2026) – SCC Highway
- 29% Reduction in PCU. Hours Delay (AM 2026) - SCC Highway / SRN interface
- 26% Reduction in PCU. Hours Delay (PM 2026) – SCC Highway
- 23% Reduction in PCU. Hours Delay (PM 2026) - SCC Highway / SRN interface
- 28% Reduction in PCU. Hours Delay (AM 2036) – SCC Highway
- 7% Reduction in PCU. Hours Delay (AM 2036) - SCC Highway / SRN interface
- 30% Reduction in PCU. Hours Delay (PM 2036) – SCC Highway
- 22% Reduction in PCU. Hours Delay (PM 2036) - SCC Highway / SRN interface

These are clearly substantial reductions but there has been no scenario analysis or assessment of how realistic these assumptions and demand reduction impacts are. We believe this level of reduction will be extremely difficult to achieve and that evidence is required to verify this for the CS to be sound.

The AM Peak is defined as 08.00-09.00 and the PM Peak as 17.00-18.00 but road users already experience congestion either side of these times and also around 15.00-16.00 in certain parts of Ipswich due to school traffic/use of pedestrian crossings etc. Experience shows that there are signs of the evening peak running from 15.00-18.30 at certain junctions and road links, e.g. the A1214, to varying degrees. It is not clear how the transport modelling considers the implication of this and the impact of congestion outside of the peak times, this needs to be explored further for the CS to be found sound with regard to Transport. It is particularly important with regard to the potential for road users to alter their journey patterns outside of the model's peak times.

Tables 15, 17, 19 and 21 for SCC Highway in Ipswich including the demand adjustments show  
 5 Junctions with overall V/C ratio of 85%+ (AM Peak) in 2026  
 12 Over-capacity links with V/C ratio of 100%+ (AM Peak) in 2026  
 11 Junctions with overall V/C ratio of 85%+ (AM Peak) in 2036  
 42 Over-capacity links with V/C ratio of 100%+ (AM Peak) in 2036  
 2 Junctions with overall V/C ratio of 85%+ (PM Peak) in 2026  
 9 Over-capacity links with V/C ratio of 100%+ (PM Peak) in 2026  
 12 Junctions with overall V/C ratio of 85%+ (PM Peak) in 2036  
 44 Over-capacity links with V/C ratio of 100%+ (PM Peak) in 2036

Previous modelling (for the IGS planning applications) has shown that many junctions and links in Ipswich are already operating at/near capacity at peak times and will continue to get worse without the 15% assumed modal shift. Clearly it will be impossible to achieve 15% modal shift in Ipswich by

2023 (for example) especially as there are no current modal shift projects running in Ipswich. Modelling work needs to show how congested Ipswich roads will be with the additional growth before 2026 with realistic, evidence-based levels of achievable modal shift. By applying a 15% modal shift reduction for the only years modelled, the modelling is hiding the fact that Ipswich roads are already heavily congested with many roads at capacity. There is no evidence that the CS is sound in relation to transport proposals in the years up to 2026.

We note that the Results Summaries are only provided with the full demand adjustments without a comparison with zero adjustment (or any levels in between). The impact of additional traffic either side of the AM and PM peaks also needs to be assessed for the CS to be found to be sound.

Section 3.9 IPSWICH RESULTS SUMMARY show that even with the high levels of modal shift and new infrastructure many junctions will be unacceptably congested. What the modelling does not show is that these junctions are ALREADY at or near capacity.

3.9.1. Several of the A1214 corridor junctions operate with an overall V/C greater than 85%.

- A1214 / Dale Hill Lane – approaching capacity in AM/PM peaks in 2036. [Although not stated we also note that the modelling shows this junction is approaching capacity in 2026.]
- A1214 / Henley Road –approaching capacity in 2036 AM/PM.
- A1214 / Westerfield Road – approaching capacity in 2036 AM/PM peaks.
- A1214 / Tuddenham Road – approaching capacity in AM peak in 2036.
- A1214 / Rushmere Road – approaching capacity 2036 AM/PM peaks.

3.9.2. V/C results show congestion in the AM and PM peak on Key Street/College St and St Helens Street / Old Foundry Road / Crown Street corridors in Ipswich town centre.

Figures 15 and 16 also illustrate the many links that reach capacity, most notably on most of the A1214 from the hospital to Bramford Rd and on surrounding roads most notably around the Ipswich Garden Suburb. Further modelling of these junctions and links at capacity at Peak times is required to assess the impacts throughout the day. If they remain congested for long periods, then clearly the CS cannot be found to be sound with regard to Transport and Air Quality.

We repeat our concerns that the modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads such as Elsmere Rd and Dale Hall Lane as well as Park Rd, which are not designed for heavy traffic and have not been included in Air Quality Assessments. It is obvious that in 2026 air quality will be worsened on these roads, which is in breach of the CS and therefore unsound. We note that this level of excessive congestion is forecast even if high modal; shift rates are achieved etc.

The level of detail of the results provided in this report and published on the IBC website is far less than in the previous 2019 report and as Appendices A-C have not been included in the Evidence Base. These Appendices should be made available publicly prior to the Inspectors examination for analysis and to inform the proceedings.

4.4 IPSWICH MODELLING RESULTS states “*4.4.1. Ipswich is highlighted as the location which benefits the most from the ISPA demand adjustments which have been applied. Ipswich experiences the highest proportional decrease in PCU Delay hours and reduction of junctions which show overall V/C issues. 4.4.2. Despite the significant benefits of the demand reductions, there are still various junction approaches along the A1214 corridor around Ipswich are shown to be over or close to capacity in both 2026 and 2036. Junctions in and around the Star Lane gyratory are shown to have capacity issues in both forecast years. Other junctions which show overall capacity issues include Nacton Road / Landseer Road and the St Augustine roundabout (Bucklesham Road / Felixstowe Road).*” IBC has not provided any evidence how these issues will be resolved and without doing so the CS is not

sound.

The Traffic modelling clearly needs to show in which year these junctions/routes reach these levels of congestion in order to plan properly for the delivery of the CS. From the results it is clear major new traffic infrastructure is required to resolve congestion on these routes and/or junctions in addition to those 12 projects already identified by SCC and assumed to be implemented.

We note that 4.7 SUMMARY 4.7.1. states "*The modelling detailed within this report is considered to be a robust basis which enables each of the LPAs to be able to test the transport impacts of the proposed housing and job growth within their respective emerging Local Plans.*" We agree that the modelling does test the impacts but do not believe that the modelling work is sufficiently robust to demonstrate that the CS is sound. We note that SCC does not go as far as saying that the CS policies in relation to accessibility and Transport are sound. In our view they are not sound, and IBC needs to provide further robust evidence that they are.

We also note that the traffic modelling excludes any construction and trades traffic involved with any of the new developments and consequently is not sound. Given the scale of development planned in and around Ipswich over the lifetime of the Plan, volumes of construction-related traffic are likely to have a material effect. This is particularly relevant to the roads around the IGS where the bulk of construction-related traffic will result given the proposed 3,500 homes and associated developments. The traffic modelling needs to include all traffic associated with the construction of the proposed new developments in the modelling work to be sound. In Ipswich, the traffic modelling also needs to include the impacts of any major sewage infrastructure works required for the new development, for instance Anglian Water's proposed strategy is to upsize 330 metres length of sewer along Valley Road and provide 550 cubic metres of storage off-line storage under Valley Rd, which will require its closure for many months.

If this required traffic infrastructure cannot be delivered in a timely and effective manner before proposed development, then such development cannot be allowed to proceed as it would lead to severe congestion. A mechanism needs to be included in the CS to ensure that this cannot be allowed to happen for it to be sound.

POLICY CS20: KEY TRANSPORT PROPOSALS states that "*The menu of potential measures is set out in the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area (ISPA). A detailed action plan will be identified through the ISPA Board. Transport mitigation measures will be funded through developer contributions, Local Transport Plan funding, New Anglia Local Enterprise Partnership funding, the Highways England capital funding programme and bidding for other relevant funds.*" This is somewhat misleading as the Mitigation Strategy includes an Implementation Programme (admittedly one that lacks detail and proper cost assessment) which requires substantial funding, including from ISPA authorities, to deliver the required levels of modal shift to deliver Policy CS20 Transport.

Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area, August 2019

We are disappointed that the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area, August 2019<sup>23</sup>, clearly a key document, has not been included from the IBC

<sup>23</sup> <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/ISPA-Transport-Mitigation-v13F.pdf>

New Evidence database. As we have only recently come across the document, we have not had sufficient opportunity to examine it in detail prior to the consultation deadline. We believe it is a key document for the Planning Inspector to consider in relation to the soundness of the Transport (and air quality) related aspects of the CS and should be assessed accordingly.

This includes an Implementation Programme for Phase 1 to 2026 with measures up to 2036 to be confirmed. SCC states "*It is anticipated that the phase 2 costs are likely to be greater than phase 1 as these will include linked roads and junctions within the town's network*".

Paragraphs 12.18.1 & 2. state that "*The focus of the implementation programme is to deliver mitigation within Ipswich to address the impact of cumulative growth identified in the ISPA planning authorities' local plans. Recognising that this work will support the Local Transport Plan strategy for Ipswich.*" and "*Modal shift has been identified as the mechanism to mitigate the impacts of this growth. Trip rate adjustments were made within the SCTM model assessment to reflect a reasonable level of modal shift. This approach to trip reduction results, broadly, in a 9% shift to the background traffic and a 7% reduction to the new trips. The implementation programme focuses on measures that will deliver this level of modal shift*".

However, the modelling work assumes reductions in Ipswich of

- around 15% (Table 6-4) in 2026 in existing car trips (with similar levels in 2036), and
- -12% AM 2026, -13% PM 2026, -11% AM 2036, -12% PM 2036 reduction in trips from new road users for 2way trips in Ipswich (Tables 6-6 to 6-9)

This level of modal shift seems to apply to ISPA as a whole whereas a far greater reduction is required for Ipswich. It is not clear that the full costs of this have been factored in. We question whether the proposed Implementation programme is sufficient to deliver the level of modal shift required in Ipswich assumed in the modelling work to deliver the CS and whether the CS is sound with regards to Transport (and hence air quality).

The evidence provided in Chapter 5 of the achievable levels of modal shift show that the required levels of modal shift for Ipswich are massively higher than the evidence base suggests is achievable or has ever been realised in the UK before. We note that the 2010 Sustrans Smarter Choices Project for Ipswich *engaged with 12,000 households in a two-year period at a cost of £474,098. Overall it achieved a 11% car with single driver trip modal shift, but this was not sustained due to the lack of long-term engagement* (Paragraph 5.2.13). It is important to understand that these levels of modal shift were achieved in summer months and there was no assessment of the levels in winter, when the number of cyclists reduces due to dark mornings/evenings and inclement weather. As 12,000 households is a sizeable proportion of total Ipswich households, this will make the modal shift targets even harder to achieve as many households will already have been targeted to change their mode of travel.

There are several reasons why these higher levels of modal shift are unlikely to be achieved in Ipswich – some of which are not specific to Ipswich. For example, the assumptions fail to consider that certain categories of workers cannot work from home and will need to use vehicles to in order to work most notably Tradespeople who use tools and carry equipment such as builders/constructors, gas & water engineers, painters, electricians, kitchen & bathroom fitters, tilers, roofers, gardeners, cleaners. The majority of these invariably travel at peak times. Another example is the growing numbers of care workers who support people to live in their homes. Unless SCC changes its school's policy in relation to choice, many parents will continue to use a vehicle to take and pick up their children from school, especially if parents also work.

Modal shift assumptions also fail to recognise the physical barriers within the town to cycling that have been identified by SCC in its draft LCWIP namely the hills, rail lines and river. Beyond the central core, routes travel uphill to the suburbs. The rail lines restrict route options to the south west of the town and it also severs routes to the north and east. In addition, the river limits north east - south west movements. In particular, many people will struggle to cycle up the steep hills out of Ipswich town. IBC needs to provide the Planning Inspector with sufficient evidence that these barriers can be overcome for the CS to be sound.

It is well known that the number of cyclists reduces in winter due to dark mornings/evenings and inclement weather, yet the modelling assumes the same levels of modal shift will apply throughout the year, which is clearly not going to happen. The modelling and modal shift assumptions are therefore unsound in this respect. IBC needs to provide evidence that extremely high levels of modal shift that have been modelled can be delivered in Ipswich by 2026 for the CS to be sound in respect of Transport and Air Quality.

Paragraph 5.4.5 states that “*Analysis has been undertaken to inform the Suffolk County Council’s Local Cycling and Walking Infrastructure Plan (LCWIP) using DfT approved tools the Walking Route Audit Tool (WRAT) and the Cycling Level of Service (CLoS). This has identified some key links for improvement.*” We are disappointed that this document has also not been added by IBC to its Evidence Base. Please refer to our earlier comments on this.

In order to increase the number of cyclists, people have to feel confident enough and safe to cycle. Yet there is no mention of developing and delivering free road-cycling courses based on national standards<sup>24</sup>. Without these it will be impossible to increase the number of cyclists to required levels even if there were substantial improvements in safer, dedicated cycling infrastructure.

Paragraph 5.5.1 states that “*Work on the walking and cycling strategy is ongoing. To date schemes have been identified to address existing gaps in the network. However, as part of the ISPA mitigation strategy implementation programme a review of the potential to introduce more ambitious measures would be undertaken, with focus on improving sustainable access to areas of employment.*” There does not appear to be much commitment to providing funding to delivering improved cycling infrastructure. Evidence is required that funding will be available for improved cycling infrastructure, training etc otherwise modal shift targets will not be achieved and the CS is therefore unsound.

In the Infrastructure chapter, Paragraph 9.24.1. states “*The provision of infrastructure needs to be considered for all workstreams in the transport mitigation implementation programme. It is intended that most improvements will manage capacity rather than significantly increase capacity due to physical constraints on the Ipswich highway network.*” This statement gives no confidence that there will be much investment in improving cycling infrastructure to increase capacity. As mentioned earlier it is not clear what infrastructure the Transport Mitigation Strategy. This needs to be made clear to the Planning Inspector for the CS to be sound.

The estimated cost of delivery of mitigation of the lower level of modal shift for ISPA as a whole to 2026, phase 1, is summarised in Table 24, copied below. It is worth noting that modal shift does not happen overnight, as it requires a major change in behaviour, but over a period of many years – this does not seem to have been factored in. To have even the remotest of chances of achieving the extremely high modal shift levels required then investment needs to be made now, especially in

<sup>24</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/769891/national-standard-cycling.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/769891/national-standard-cycling.pdf)

infrastructure projects which obviously include planning and build times on top of the length of time to deliver behavioural change. The long lead times of infrastructure based behavioural change projects appears not to have been factored in.

Table 24 – Phase 1 cost estimate

Workstream Range of costs to 2026

|                                         |            |            |
|-----------------------------------------|------------|------------|
| Monitoring                              | 500,000    | 700,000    |
| Smarter Choices & QBP project team      | 2,300,000  | 2,500,000  |
| Incentives, including bus route subsidy | 4,440,000  | 5,000,000  |
| Parking review                          | 100,000    | 200,000    |
| Infrastructure                          | 16,000,000 | 20,000,000 |
| Technology                              | incl       | tbc        |
| Total                                   | 23,340,000 | 28,400,000 |

We note that Technology costs remain to be confirmed. SCC state “*The use of technology will be considered for all mitigation measures and improvements, especially where it will provide a cost-effective mechanism to deliver the implementation programme and improve modal shift.*” It is clear that Technology costs are likely to be significant. These urgently need to be costed with funding agreed by the relevant authorities for the CS to be found to be sound.

The apportionment of costs by Local Planning Authority is defined in Table 22 below:

Table 22: Trips In/Out of Ipswich

| LPA                              | % trips |
|----------------------------------|---------|
| Ipswich Borough Council          | 45      |
| Suffolk Coastal District Council | 28      |
| Babergh District Council         | 14      |
| Mid Suffolk District Council     | 13      |

Chapter 11 Funding sources does not inspire confidence that sufficient funding is available, and that Authorities have committed to providing their share. We note that IBC’s FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS allocates no money at all for modal shift measures. Evidence needs to be provided that sufficient funding is guaranteed, and that each Authority has committed to providing its share of the required funding to deliver the proposed 9% shift to the background traffic and 7% reduction to the new trips. Although this is still far lower than the approximate 15% and 12% reductions the modelling work assumes will happen in Ipswich.

For the CS to be sound an Implementation Programme needs to be included in the CS costed and agreed to be funded by all Authorities that delivers the higher levels of modal shift required to be achieved in Ipswich by 2026. Assurances for funding of the required Phase 2 measures from authorities should also be required for the CS to be sound.

As we have previously stated, there is a single assumption that these levels of modal shift will be delivered, without any scenario modelling e.g. at 25%, 50% and 75% success rates. How will IBC deliver the CS if these unprecedented levels of modal shift are not achieved? Currently Ipswich Borough Council has not provided sufficient evidence that the required levels of modal shift required in Ipswich are achievable or that it has the funding in place to deliver them for the CS to be found to be sound.

### cycling in England in July 2019<sup>25</sup>.

Section 32 recommends that “any revised Cycling and Walking Investment Strategy include targets for getting people to switch from driving to active travel. These targets should be based on the number of journeys made by car, foot or bicycle for journeys of less than 1, 2, 5 and 10 miles.” The Government should set modal shift targets for 2025 and 2040, to align with the targets it sets for increasing levels of walking and cycling. These should be at a level that ensures England meets—at the very least—the Committee on Climate Change’s assumption that there will be a 10% transport modal shift by 2050. Local authorities should be encouraged to set local targets for modal shift as part of their Local Cycling and Walking Infrastructure Plans”. Clearly IBC needs to include modal shift targets in the CS for it to be sound. Whilst we believe that modal switch will be easier in a town than across the UK, it is unbelievable to expect that 15% modal shift can be achieved in 2026. If the Committee on Climate Change is assuming that 10% modal shift targets (over 30 years) are appropriate for the UK in 2050, IBC needs to provide the evidence that it can achieve over 50% higher modal shift in just 6 years (80% lower time frame)? Where is the evidence that IBC can deliver these far higher levels of modal shift in a substantially shorter time frame for the CS to be sound?

### Suffolk's Local Transport Plan 2011 - 2031

We also note that SCC's Suffolk's Local Transport Plan 2011 - 2031<sup>26</sup> seems to be the most recent version available. This is split into two parts and outlines SCC's objectives for transport:

- Suffolk's Local Transport Plan - Part 1 (PDF, 1MB) is a 20-year strategy that highlights the council's long-term ambitions for the transport network.
- Suffolk's Local Transport Plan - Part 2 (PDF, 5MB) is a four-year implementation plan indicating how the council are proposing to address the issues identified within the longer-term transport strategy.

There is no updated version of this in the IBC Local Plan Evidence Base or on the SCC website. A publicly available current Implementation Plan showing how SCC will provide funding to address the key transport issues and the levels of modal shift required to deliver Ipswich Borough Council's CS does not appear to exist. Without this Ipswich Borough Council is unable to provide sufficient evidence that it can deliver Policy CS20 and therefore the CS is unsound.

As previously stated we are not aware of any major improvements to existing cycle routes on the existing road network in Ipswich since that approval of the current CS. IBC needs to provide evidence of what improvements have been made and are planned for existing road network in order to deliver the high rates of modal shift (and lower trip rates) that the traffic modelling uses. Without the provision of supporting evidence lower modal shift rates and higher trip rates should be adopted in the modelling work.

<sup>25</sup> <https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/1487/1487.pdf>

<sup>26</sup> <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>

## **Paragraph 8.220**

There is clear evidence that poor air quality does detriment on health. This needs to be amended to read “Air Quality Management Areas are designated in areas where poor air quality will have an effect on people’s health”. Failure to recognise this undermines the soundness of the Plan.

## **Policy DM1 Sustainable Construction**

At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. Policy DM1 needs to be updated to include this commitment and then strengthened to ensure that the CS delivers carbon neutrality of the Council by 2030 for it to be sound. New build homes built by the Council will have to be zero carbon for this to happen and the Council should require other developers to do likewise. This would be consistent with the Court of Appeal’s ruling on 27/02/20 that the government’s Heathrow’s expansion decision was unlawful because it did not take climate commitments into account.

## **Policy DM2 Decentralised Renewable or Low Carbon Energy**

This policy also needs to be updated and strengthened to incorporate the declaration of a Climate Emergency. The energy requirements of new build homes built by the Council will have to be zero carbon for the Council to become carbon neutral by 2030. The Council should require other developers to do likewise.

## **Policy DM3 Air Quality**

We support the strengthening of DM3 from the previous draft version of the Plan, which was hopelessly weak and ineffective. However there remain major flaws in IBC’s approach to improving air quality which mean the CS is unsound.

The Core Strategy Adopted December 2011 Paragraph 9.95 states “*With the levels of growth proposed for the town coupled with the fact the town already has three Air Quality Management Areas it is felt essential that air quality impacts and mitigations are fully addressed.*” Paragraph 8.201 of the current CS states “*There are, in addition, four Air Quality Management Areas (AQMAs) within the central area of Ipswich, as a result of pollutants from road traffic.*” There are now five AQMAs in Ipswich. This increase from three to five AQMAs is simply not acceptable given the strong clear evidence of the detrimental impacts on human health. Clearly IBC is not doing enough to improve air quality and must do more for the CS to be sound.

NPPF 181 suggests planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. The CS needs to make a clear commitment to improving air quality in Ipswich and compliance with legally binding air pollution targets for the CS to be sound.

In relation to DM3 Topic Paper: Air Quality, Transport and Green Infrastructure Paragraph 20 states that “*the Council has given consideration to the Government’s Clean Air Strategy 2019 and exercised its duty under the Environment Act 1995, and DEFRA’s Local Air Quality Management Policy Guidance LAQM.PG16, (4) with the preparation of a draft Air Quality Action Plan (AQAP) and this too has been through a phase of public consultation leading to its (likely) adoption in 2019*”. We note

that this has now been adopted without taking any notice of most of the criticisms made by consultees. Paragraph 51 states "*The Local Plan Review Preferred Options sit alongside the Council's draft Air Quality Action Plan which looks beyond planning at other measures including corporate measures that can be put in place to improve air quality. The Council's AQ action Plan will be scrutinised by DEFRA, having been subject to public consultation in late 2018.*" IBC needs to confirm that this has happened and provide the results of the examination to help demonstrate the CS is sound.

Defra's template guidelines for the Air Quality Action Plan require firm, time bounded actions that **will deliver** a reduction in air pollution in the five AQMAs. However, IBC fails to follow Government's guidelines and chooses to water down Government requirements. Ipswich Borough Council fails to make the required firm commitment in its AQAP to delivering any reduction in air pollution nor does it set out when it will deliver actual improvements in air quality or specifically how it will do this. In our opinion the AQAP is therefore non-compliant with Government requirements and shows a lack of commitment from IBC to improving air quality in Ipswich in breach of its legal duty to do so. This is clearly to the detriment of residents who consequently suffer from higher incidents of poor health and respiratory disease especially in and around the AQMAs. The HRA fails to take into account the non-compliance of the AQAP with Government guidelines.

The WSP Source Apportionment Study (dated June 2018) supported IBC's AQAP. However, this study is flawed and under-estimates NOx emission levels.

1. The Source Apportionment Study was undertaken for AQMA No.2 (the junction of Crown Street with Fonnereau Road, St. Margaret's Street and St. Margaret's Plain) and AQMA No.5 (Matthews Street/Norwich Road between the Civic Drive roundabout and Bramford Road).
2. ANPR cameras were deployed at two roadside count points located on the A1156 in Ipswich to gather detailed information on the local vehicle fleet. Measurements were conducted over a twelve-hour period each day starting at 07:00 on 27th (Friday), 28th (Saturday) and 30th (Monday) April 2018. One of the two ANPRs (in AQMA2) failed at 14.00 Monday (missing the Monday evening peak).
3. Speeds were only measured for the Friday and Saturday and used in the calculation of the vehicle NOx emission rates for these two days. The averages of the hourly measurements made on both days were used to calculate the vehicle NOx emission rates for the 30th April. The report states that traffic speeds were higher on Saturday (somewhat obviously). Other UK traffic flow studies show that Friday traffic volumes in general tend to be lower than other weekdays (as more people like to work from home on a Friday and some sectors tail off ahead of the weekend). Friday evening peak traffic is also lower than other weekdays as people leave work earlier and there are less after-school activities and hence fewer associated traffic movements. We are dismayed that there was no speed measurement between Monday and Thursday, which would have given a more accurate representation of pollution levels. It is also worth noting that more vulnerable schoolchildren are mainly impacted on weekdays for obvious reasons.
4. The report states the obvious in that "Analysis of the NOx emissions shows that they were inversely proportional to vehicle speed, as shown in Figure 7. This means that lower vehicle speeds will give rise to higher emissions, for example during congested periods at peak rush hour time, in addition to the increase in emissions associated with increases in vehicle number." So, the report underestimates Monday's emissions (and hence Tues, Weds, Thurs) and thereby under-estimates what additional measures will be required.
5. At the end of the 2-day measuring period of the two pneumatic strips measuring speeds was found to be loose. The report acknowledges that "this may have caused inconsistencies in the traffic flows and/or directional assignment measured during the traffic survey" i.e. the results are unreliable and hence the report is further flawed.

We note that Paragraph 47 of the Topic Paper states that “Air Quality modelling was completed in 2016 in relation to locations identified for future development under the Ipswich Core Strategy and Policies Development Plan Document Review, and Ipswich Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document (the Ipswich CS, 2017)”. We believe that this work assumed the Upper Orwell Crossing project would proceed and as this has been cancelled is therefore obsolete. It excluded all emissions arising from construction including construction traffic and tradespeople journeys. It also failed to assess the multi-site build out of the IGS and air pollution levels in the early years of the IGS build. New Air Quality modelling work needs to address these issues and focus on air quality levels in the first 10 years of development, when they are likely to be at their highest levels (before European vehicle emission standards deliver expected emission reductions).

We note that there is no Air Quality assessment provided as part of this consultation, which is unacceptable (although they are planned). We reserve the right to comment on this when it is available and request that IBC notify and consult with us when this work has been released. Whilst we agree with the areas to be assessed identified in the WSP Screening Report January 2020, we disagree with just the two reference years of 2026 and 2036 being used and argue that an earlier year, such as 2023 (being the midpoint between 2020 and 2026. The reason is that by 2026 tighter vehicle emission standards should be delivering improvements and that it is the early years of the CS period when emissions could be at their most dangerous and greater action required to prevent premature deaths. It is completely pointless using 2036 when considering the 2035 (at the latest) ban on petrol, diesel and hybrid vehicles, which will obviously have a major impact many years before this date. We note that the screening assessment uses the SCTM traffic forecasts, which exclude any form of construction traffic. The air quality assessment needs to include emissions from construction traffic and construction otherwise the assessment and hence the CS will be unsound. We note that the SCTM assumes high levels of modal shift without sufficient evidence that this is achievable. Sensitivity testing of different rates of modal shift is therefore required in the assessment for it to be considered sound.

We support the revised draft Policy DM3 of the CS, which states that “Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.” This has not been done for the IGS development (see below) and needs to be undertaken as a priority before building works be allowed to commence. We also note Paragraph 9.3.5 states that “The AQA should also consider wider cumulative impacts on air quality arising from a number of smaller developments”. In our view that the multi-site build out of the IGS needs to be assessed in a new AQA. The HRA fails to assess the non-compliance of the AQA for the IGS with DM3 and needs to assess this accordingly.

Paragraph 1.2 IBC’s AQAP confirms the use of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments (Appendix 2). However, the IBC Planning Department is currently not implementing the Guidance in the way it needs to be in order to improve Air Quality in Ipswich. This is especially pertinent considering the proposed expansion of Ipswich detailed in the CS. This urgently needs to be corrected for the revised CS to be sound. When assessing the Planning Applications in relation to Land To South Of Railway Line, Westerfield Road IP/14/00638/OUTFL and Land to the North of the Railway Line and East of Henley Road 16/00608/OUT the Air Quality guidance was ignored in relation to Sections 6.22 and 6.23 (see Appendix 2). No Air Quality Assessment was undertaken for either application that assessed the impact of construction and construction traffic on Air Quality nor was there an Air Quality assessment carried out for the first year of occupation of any of the phased developments,

when there will also be considerable construction traffic as well as substantial additional traffic from the new homes. This raises four key questions that need to be answered by IBC when assessing the soundness of the CS Preferred Options.

- Question 1 Why has the Council chosen to ignore the Guidelines it has adopted and decided not to assess the impact of emissions from construction and associated construction traffic on Air Quality for these IGS sites?
- Question 2 Why has the Council chosen to ignore the adopted Guidelines and chosen not to assess air quality emission for the first year of each phase (when there will also be emissions from the construction of other phases that are being built in parallel)?
- Question 3 How can the Council assess whether these developments “will compromise or render inoperative the measures within an Air Quality Action Plan, where the development affects an AQMA” as required by Section 6.22 of the guidelines?
- Question 4 How can IBC demonstrate compliance with Policy DM3 in the early years of the IGS development, when considering construction traffic and sewage infrastructure works?

In our view the IGS is non-compliant with Policy DM3.

This is particularly pertinent as much of the construction traffic will pass through AQMA 1 and 4 with tradespeople also travelling through AQMAs 2 and 5 as well. Consequently, IBC is currently failing to properly assess the impacts of the construction and related traffic from the IGS development in the early years of the build out on air quality in Ipswich. It has not assessed whether these developments will compromise the current version of the draft Plan, nor the Air Quality Action Plan.

We cannot find any air quality assessment in relation to rail transport or to shipping at the Port of Ipswich, with both forms of transport increasing. This is a major gap in the evidence base that risks rendering the CS unsound especially as ISPA plan to increased capacity on railway lines for freight and passenger traffic (Policy ISPA2 Strategic Infrastructure Priorities f)). AQ assessments are required for:

- The Port of Ipswich (which is included in the Screening assessment study area),
- the Ipswich Chord and Freight yard, where diesels regularly sit idling emitting pollutant clouds,
- additional freight to and from Port of Felixstowe (Felixstowe-Nuneaton upgrade), we note that rail freight is planned to increase by 50% and the number of trains by 30%, and
- additional freight in relation to the construction of Sizewell C.

We are not arguing against growth, but simply advocating the impacts of air quality need to be properly assessed so that mitigation action can be taken where required. Without this the CS is unsound.

The HRA also fails to consider train and shipping emissions, which need to be included in the HRA especially as shipping will clearly impact on the Orwell Estuary, which is part of a Special Protection Area (SPA) and Ramsar site. We note that the DfT Port Air Quality Strategy (under the Defra Clean Air Strategy , 14 January 2019) applies to ports with cargo greater than 1million tonnes, which would appear to include the Ipswich Strategic Harbour Authority.

We note that the Council failed to apply for any funding under the Clean Air Fund by the November 2018 deadline for projects that are to commence from March 2019. As the Council has no evidence basis or costings for any of its proposed projects in its AQAP, it will not be eligible for future Clean Air Funding. This clearly begs the question how will IBC fund the projects that it has identified in the AQAP as needed to reduce air pollution? We also note that IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS allocates no money at all for improving air quality despite being the responsible authority for doing so. IBC needs to provide evidence that it will be able to finance and deliver its AQAP for the CS to be sound.

## **DM8 Natural Environment**

Please see our comments under Policy CS4.

## **DM20: House in Multiple Occupation**

We support the new Policy 20 as a pragmatic and sensible response to an increasing issue in Ipswich.

## **DM21: Transport and Access in New Developments**

We strongly object to the removal of the reference to traffic capacity and rights of way in

- a. *not result in a severe adverse impact on rights of way or the local road network in respect of traffic capacity and highway safety;*

The references to “rights of way or the local road network in respect of traffic capacity” needs to be reinstated as walking and cycling rights of way should not be reduced and as traffic congestion is already a major problem in Ipswich and should not be negatively impacted on by local new developments. The proposed changes conflict with CS5 Improving Accessibility and renders the CS unsound. We support the change in relation to highway safety.

We support the requirement of

- b. *not result in a significant detrimental impact on air quality or an Air Quality Management Area and address the appropriate mitigation measures as required through policy DM3*

but note that the IGS development is currently non-compliant as it failed to assess the impacts of the development on air quality in accordance with DM3. A revised assessment of air quality impacts of the IGS is urgently required before building can commence and the revised CS can be found to be sound.

It remains unclear how ‘severe’ and ‘significant’ impacts are defined. These need to be clearly defined in the CS. In the case of air quality, there are maximum legal limits for particulates and nitrous oxides, and it would be appropriate for ‘significant’ to be defined as the legal limit.

## **Chapter 10 Implementation**

Tables 8A and 8B needs to include the required specific junction improvement projects, estimated cost and a date by which they are required to be delivered in accordance with the transport modelling assumptions for the CS to be sound.

Table 8A omits the technology costs that will be required to deliver as stated in Table 24 of the SCC Transport Mitigation Strategy. This needs to be included for the CS to be sound as modal shift targets will not be delivered without new technology.

Table 8A needs to clearly identify that substantial funding will be required for sustainable transport measures in Ipswich and infrastructure to support them after 2026 and that the level of funding will be greater than that required up to 2026 as identified in the SCC Mitigation Strategy.

The Link road through site IP029 via Europa Way from Bramford Road to Sproughton Road identified in Table 8A has been included in the SCC Modelling assumptions and therefore must be considered as a requirement. If not, the modelling is unsound and needs to be repeated without this link road. We note that in response to the creation of the Suffolk County Council taskforce to improve Ipswich traffic David Ellesmere is quoted in the East Anglian Daily Times as demanding “a new link road

connecting Europa Way with Bramford Road to alleviate traffic pressures, and work to explore a new road link connecting London Road, Hadleigh Road and Sproughton Road".

### **OBJECTIVE 5: Air quality**

We strongly object to the removal of the current Objective to improve Air Quality which in relation to the five AQMAs is a legally binding requirement. We also note that the Planning Inspector specifically requested the inclusion of this indicator in the last review of the current CS. The existing indicator of the "Number of recorded air quality exceedances." Needs to be retained and reported on. We support the inclusion of an air quality objective but believe this should be to reduce air quality emissions to legally binding limits by a specified date for example within 3 years.

As mentioned previously. It is not clear what the 2004 levels are or how progress against these will be measured; 2004 emissions levels should be included in the CS for completeness so that the target is clear. For example, do 2004 measuring locations correspond with the current measuring locations and if not, how will IBC determine whether levels have returned to 2004? Furthermore, it is not clear when IBC aim to return to 2004 levels. This needs to be done as a matter of urgency and should not be left to 2036 as would be possible under the current Plan, by which time many more Ipswich residents will have died prematurely.

An Objective of "Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels" does not go far enough. Limiting this to an "aim" provides a massive caveat to the Objective. Also, how will the Council determine that EVERY development has contributed?

### **OBJECTIVE 6: Transport and connectivity**

Given the distinct lack of progress in cycling infrastructure an additional indicator is required to measure improvements, especially in relation to the development of new/improved comprehensive, integrated cycle routes.

As identified above, IBC needs to start taking more positive actions to Improve Accessibility as it is currently non-compliant with CS5. Closer scrutiny of IBCs approach to Improving Accessibility is clearly required and additional Objectives/measures are required to monitor and assess progress on Improving Accessibility in the CS to help ensure IBC comply with CS5 in future.

### **IPSWICH LOCAL PLAN REVIEW 2018 - 2036 INTERIM SUSTAINABILITY APPRAISAL REPORT Strategic Environmental Assessment and Sustainability Appraisal October 2019**

A key problem with the Sustainability Appraisal (SA), Habitats Assessment and Health Impact Assessment, are that they simply assume that the CS will be fully implemented and that full funding for all the measures identified in the CS will be secured. In particular, there is no evidence that IBC (in conjunction with SCC) can deliver the substantial improvements in walking, cycling and bus infrastructure, improved road infrastructure and the project required to deliver the unprecedented levels of modal shift required for the CS to be sound. IBC and SCC's track record in these areas is dire with no evidence provided by IBC that this will change. There has been an increase in AQMAs and traffic with little real improvement in cycling or walking infrastructure and a major deterioration in bus services e.g. the closure of the Norwich Rd Park and Ride Scheme and reduction in rural bus services into Ipswich. The failure of Travel Ipswich (Ipswich Fit for the 21<sup>st</sup> Century)to deliver modal shift and the Upper Orwell Crossings project illustrate the problems facing IBC.

In our opinion it is too early to fully comment on the Report for several reasons, including:

- No SA of IBCs non-compliance with Sections 6.22 and 6.23 of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments of the IGS proposed developments regarding construction traffic and assessment of the early years of the development.
- No SA of IBC's non-adherence to Government Guidelines for IBC's own Air Quality Action Plan in relation to the IGS and the Plan. No consideration that the CS does not comply with legally binding air quality targets.
- No SA of the air quality modelling/assessment of road traffic (as this has not been done yet).
- No SA of the omission of emissions from construction and traffic associated with construction of the IGS.
- No SA of the ability to meet the unprecedented levels of modal shift required for the CS to be sound (as identified in the transport modelling and SCC Transport Mitigation Strategy) and no assessment of what happens if the targets are not achieved.
- No SA of the lack of sewage infrastructure plan/proposals for the IGS and ISPA and SA of the environmental impacts of delivering new sewage infrastructure required for Ipswich, including emissions and impact of traffic congestion arising from the required foul water construction works.
- No SA of air quality or noise assessment in relation to rail transport most notably for the Ipswich Chord and Freight yard, where diesels regularly sit idling, emitting pollution and additional freight to and from Port of Felixstowe,
- No SA of the environmental impacts of the Port of Ipswich.
- No assessment of the potential impacts of increased freight traffic on the IGS pedestrian bridge and Westerfield rail crossing (including impacts on traffic delays).
- No SA of the decision to destroy the Green Rim by building homes on the Humber Doucy Lane part and re-designating it as Green Trails.
- The apparent lack of a full appraisal of the impacts on building on land at Humber Doucy Lane in the north east.
- No SA of the alternative of using land reserved for Retail and Car Parking in the town centre, which we believe is surplus to requirements, instead of building on Humber Doucy Lane.
- No SA of the omission of the incorporation of IBC's declaration of Climate Emergency into the Plan.

An updated SA is required to consider all these issues and consulted upon accordingly for the CS to be properly examined and progressed accordingly. Until the SA addresses these issues the CS cannot be deemed sound. We reserve the right to comment on the SA as it is developed.

### **Habitats Regulation Assessment (HRA)**

Please see our opening comments in relation to the Sustainability Appraisal, which apply to the Habitats Regulation Assessment.

The HRA is currently incomplete and needs to address the following impacts of :

1. The proposed re-designation of the Green Rim.
2. The new sewage infrastructure that will be required to deliver the housing and employment targets.
3. The required traffic infrastructure identified by the traffic modelling to improve the road network to allow the sustainable delivery of the CS (summarised above).
4. The non-compliance of the IGS AQA with DM3.
5. Emissions from rail and shipping.

If no such assessments are included in the HRA then the HRA needs to explain why they have been omitted.

IBC's response<sup>27</sup> to the Habitat Regulation Assessment (HRA) recommendations in relation to Paragraph 1.29 is not acceptable. This recommendation states "*In order to make ecological networks and wildlife sites capable of future resilience, there is a need for more wildlife sites, and that existing networks need to be bigger, better and more connected.*" The CS needs to be strengthened to ensure compliance with this recommendation especially as IBC's proposal to re-designate the Green Rim (which has not been assessed by the HRA) is clearly detrimental to this requirement.

It also needs to assess whether the lack of S106 payments for RAMs mitigation from the two IGS sites that received outline planning permission in February 2020 is acceptable as discussed earlier.

### **Health Impact Assessment**

Please see our opening comments in relation to the Sustainability Appraisal, which apply to the Habitats Regulation Assessment. The Health Impact Assessment fails to take into full account the removal of the Ipswich Green Rim, the non-compliance with legally binding air quality targets, emissions from construction, port and rail activities and the failure to include recognition of the Climate Emergency into the Plan.

Brian Samuel

Submitted on behalf of the Northern Fringe Protection Group<sup>28</sup>

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<sup>27</sup>[https://www.ipswich.gov.uk/sites/default/files/response\\_by\\_ibc\\_to\\_the\\_habitat\\_regulation\\_assessment\\_jan\\_2020\\_0.pdf](https://www.ipswich.gov.uk/sites/default/files/response_by_ibc_to_the_habitat_regulation_assessment_jan_2020_0.pdf)

<sup>28</sup>The Northern Fringe Protection Group (NFPG) is making this representation on behalf of its members and other residents who have authorised the NFPG to represent them. A list can be supplied on request.

## **Appendix 1 Evidence that the Green Rim should not be reclassified as Green Trails**

- Ipswich Local Plan November 1997

This makes specific reference to 9 green corridors (A-I) in Chapter 3. Paragraph 3.12 states  
*"These green spaces offer the opportunity to form corridors linking the inner parts of the Town with the surrounding countryside, visually and by providing access on foot or by cycle. These corridors are indicated on Plan No 1."*

NE2 also states that "*The protection of the landscape quality and character of the countryside \*including the Area of Outstanding Natural Beauty (AONB) will be a prime consideration and proposals for irreversible development which is not required for the efficient operation of agriculture, forestry and recreation will not be permitted in the countryside as indicated on the Proposals Map unless there is an overriding case for a rural location.*"

It is clear it is the intention that the green corridors will provide access on foot or by cycle to the surrounding countryside and it is this countryside that was intended to form the green rim of Ipswich.

- Ipswich Core Strategy and Policies Development Plan Document December 2011

Chapter 7: The Key Diagram references (v) The green corridor and green rim approach to strategic green infrastructure (Policy CS16); The green rim almost completely covers the Ipswich Borough Council boundaries, which essentially reflects the countryside in the 1997 Proposals Map.

POLICY CS16: GREEN INFRASTRUCTURE, SPORT AND RECREATION Paragraph 8.175 states "*As the Borough grows, it is essential to protect, enhance and extend the network of open spaces, green corridors, and sports and recreation facilities. This is important in order to: allow people access to green space and nature; strengthen ecological networks that enable wildlife to migrate more easily around the town; link inner and outer parts of the Borough by providing walking and cycling routes;*"

*It will do this by [a number of means including]  
f. working with partners to improve green infrastructure provision and link radial green corridors with a publicly accessible green rim around Ipswich;"*

It is clear the December 2011 Plan continues the concept of the green corridors providing walking and cycling routes to access the green rim and that the green rim was not intended for this purpose. We note that there remain 9 green corridors in the 2011 Plan as there were in the 1997 plan.

The green rim on the 2011 Key Diagram (pg 30) is very much larger than that in the current Key Diagram and clearly illustrates that the concept of the green rim is to protect the countryside on the perimeter of Ipswich Borough. It is also clear the Green Rim has been decimated beyond its original intention.

- Ipswich Core Strategy and Policies Development Plan Document February 2017

Diagram 3 of the Plan (pg 24) and the associated Plan 6

[https://www.ipswich.gov.uk/sites/default/files/plan\\_6\\_green\\_corridors\\_-](https://www.ipswich.gov.uk/sites/default/files/plan_6_green_corridors_-)

[adopted feb 2017.pdf](#) shows that 9 green corridors remain and illustrates the green rim (which has shrunk from the previous Plan).

CS 16 states that “*The Council will safeguard, protect and enhance biodiversity and the environment by working in partnership with others to ensure that our parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefitting the whole community. The Council will enhance and extend the ecological network and green corridors, open spaces, sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk. It will do this by:*

*g. working with partners to improve green infrastructure provision and link radial ecological networks and green corridors with a publicly accessible green rim around Ipswich;”*

This continues the concept that it is the green corridors that provide the links to the green rim.

- Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, Suffolk Coastal District Council and Suffolk County Council  
Statement of Common Ground in relation to Strategic Cross Boundary Planning Matters in the Ipswich Strategic Planning Area Version 3 – December 2018

Section I Annex – Cross Boundary Infrastructure Requirements - Green Infrastructure pg 25 references the Infrastructure requirement for “*Creation of ‘green rim’ around Ipswich*” in accordance with the Update to the Haven Gateway Green Infrastructure Strategy for the Ipswich Policy Area (August 2015), Ipswich Borough Council Local Plan Review Preferred Options (November 2018) policy ISPA4 Cross Boundary Working to Deliver Sites and CS16 green Policies ISPA4 and SCLP12.24 require development to contribute to the creation of the ‘green rim’. This is clearly categorised as “Green Infrastructure” and not as “Transport Infrastructure”.

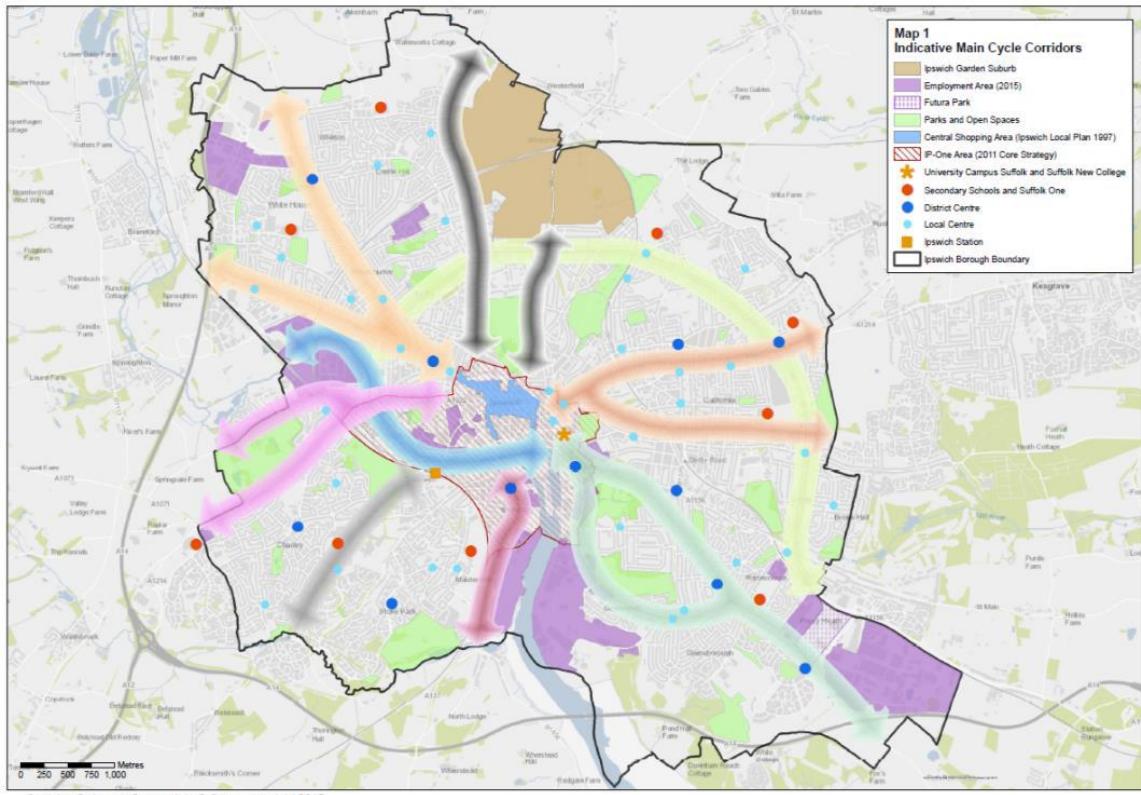
- Comparison of cycle routes and the proposed green trails in the Key Diagram

When cross-referencing the current Key Diagram and green trails with the Ipswich cycle map <http://www.greensuffolk.org/assets/Travel-Plans/Documents/Cycling/IpswichCycleMap.pdf> we have the following observations:

1. A green trail clearly suggests a “route”, but the Key Diagram map shows a green area.
2. Under no stretch of imagination would one call a road used by motor vehicles a green trail.
3. No cycle route through the Chantry Park part of the green trail.
4. No cycle route at all through the Humber Doucy Lane stretch of the green trail.
5. No cycle route through the Purdis Heath part of the green trail.
6. No cycle route through the Rushmere Heath part of the green trail.
7. No green cycle route other than Thurlestone Lane in the green trail above Whitton
8. No cycle route in the green trail between Ipswich and Westerfield.
9. No cycle routes through the Pipers Vale and Ravenswood other than a small dead-end stretch in the former and a looped cycle path around Ravenswood housing estate, which is hardly green.

- The Ipswich Cycling Strategy Supplementary Planning Document March 2016

This does not identify any of the Green Rim as cycling corridors as summarised in Map 1 Paragraph 6.12 reflects the Key Diagram. This clearly shows that the Green Rim was never intended as cycle routes and should not be reclassified as Green Trails.



Contains Ordnance Survey data © Crown copyright 2015.

- [Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018<sup>29</sup>](#) Jointly commissioned by Ipswich BC and neighbouring authorities

Pg 11 refers to the Green Rim in the context of the Ipswich Key Diagram stating “this green rim is intended to provide an ecological corridor and a recreational resource”. There is no reference to “trails” and if this was the intention one would have expected IBC to correct this reference as it is fundamental to the report.

<sup>29</sup> <https://www.ipswich.gov.uk/sites/default/files/settlement-sensitivity-assessment-july2018.pdf>

## **Appendix 2 Extracts from The Institute of Air Quality Management and Environmental Protection UK guidance**

**6.22** The report prepared detailing the results of the assessment should contain the following information (but not necessarily in this order):

*j. Description of construction phase impacts.* These impacts will relate primarily to dust emissions, which give rise to dust soiling and elevated PM10 concentrations, although construction plant and vehicles may need assessment. The assessment should take into consideration the likely activities, duration and mitigation measures to be implemented. The distance over which impacts are likely to occur and an estimate of the number of properties likely to be affected should be included. This assessment should follow the guidance set out by the IAQM<sup>31</sup>

*m. Summary of the assessment results.* This should include:

- Impacts during the construction phase of the development (usually on dust soiling and PM10 concentrations);
- Any exceedances of the air quality objectives arising as a result of the development, or any worsening of a current breach (including the geographical extent);
- Whether the development will compromise or render inoperative the measures within an Air Quality Action Plan, where the development affects an AQMA.

**6.23** Most assessments are carried out for the first year of the proposed development's use, as this will generally represent the worst-case scenario. This is because background concentrations of some pollutants are predicted to decline in future years, as emissions from new vehicles are reduced by the progressive introduction of higher emissions standards. Where development is phased, however, it may also be appropriate to assess conditions for the opening years of each new phase.

This submission is **confirmed**

[26194]

**(Object)** Site Sheets, Site Ref: ISPA 4.1 (Policy SP2 & ISPA4) Northern End of Humber Doucy Lane

Respondent: [\*\*Derk Noske \[2526\]\*\*](#)

Received: **14/02/2020 via Web**

This site should remain as farmland to provide the Green Trail route outlined in the planning policy DM10 of the Ipswich Local Plan. Any additional housing would encroach on this pristine countryside that today provides easy access to green spaces as set out in the local plan

**Changes to plan:** No housing to be developed on these sites

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Written Representation

This submission is **confirmed**

[\[26195\]](#)

### Object Policy ISPA4 Cross Boundary Working to Deliver Sites

Respondent: [Derk Noske \[2526\]](#)

Received: **14/02/2020 via Web**

This site (ISPA4.1) should remain as farmland to provide the Green Trail route outlined in the planning policy DM10 of the Ipswich Local Plan. Any additional housing would encroach on this pristine countryside that today provides easy access to green spaces as set out in the local plan

**Changes to plan:** No housing to be developed on these sites.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Written Representation

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**O**



**Felicia Blake**

---

**From:** Michael Hammond  
**Sent:** 26 February 2020 11:40  
**To:** Suzanne Nugent  
**Cc:** PlanningPolicy  
**Subject:** RE: Representation to Ipswich Local Plan Review Final Draft Consultation - Allocation IP011b - Ortona Properties Ltd

Dear Suzanne,

Thank you for clarifying this. I will ensure the most recent version is uploaded when the representations are confirmed before being submitted to the Inspector.

Regards,

Michael

**Michael Hammond**  
Senior Planning Officer (Policy)  
Planning and Development

01473 432905  
[michael.hammond@ipswich.gov.uk](mailto:michael.hammond@ipswich.gov.uk)  
Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1 2DE

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[www.ipswich.gov.uk/ctaccount](http://www.ipswich.gov.uk/ctaccount)

**From:** Suzanne Nugent  
**Sent:** 26 February 2020 11:37  
**To:** Michael Hammond <[Michael.Hammond@ipswich.gov.uk](mailto:Michael.Hammond@ipswich.gov.uk)>  
**Cc:** PlanningPolicy <[PlanningPolicy@ipswich.gov.uk](mailto:PlanningPolicy@ipswich.gov.uk)>  
**Subject:** RE: Representation to Ipswich Local Plan Review Final Draft Consultation - Allocation IP011b - Ortona Properties Ltd

Dear Michael

Many thanks for your email. Our client supports the proposed 100% housing allocation.

I have amended our response form as such (please find attached) ; this therefore supersedes the one previously submitted.

Regards

Suzanne

**Suzanne Nugent Bsc (Hons) Msc MRTPI**  
**Planner**  
(my usual working days are Tuesday, Wednesday and Thursday)

PlanSurv has updated its privacy policy in accordance with the Data Protection Act 2018 which can be downloaded from our website [www.plansurv.co.uk](http://www.plansurv.co.uk).

Company Registration Number: 0959600

Directors: Adam John Tuck and Michael Edward Hendry

Registered office: 76 Broad Street, Ely, Cambridgeshire, CB7 4BE.

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**From:** Michael Hammond <[Michael.Hammond@ipswich.gov.uk](mailto:Michael.Hammond@ipswich.gov.uk)>

**Sent:** 25 February 2020 12:21

**To:** Suzanne Nugent <[suzanne@plansurv.co.uk](mailto:suzanne@plansurv.co.uk)>

**Cc:** PlanningPolicy <[PlanningPolicy@ipswich.gov.uk](mailto:PlanningPolicy@ipswich.gov.uk)>

**Subject:** RE: Representation to Ipswich Local Plan Review Final Draft Consultation - Allocation IP011b - Ortona Properties Ltd

Dear Suzanne,

I was just wondering if you could please clarify your representation on IP011b so that when I summarise the rep I have not misrepresented your client's view.

Your representation states; "The landowner supports the existing allocation for the primary residential use and secondary employment use of the site."

Under the Final Draft Local Plan (Reg 19), we have removed the employment element of the allocation and are now allocating it solely for housing.

For the avoidance of doubt, please could you therefore confirm whether:

- Your opening sentence is an objection to the proposed change in the uses of the proposed allocation and that presumably you would only support if it returns to the originally adopted mixed-use allocation? Or
- You support the proposed 100% housing allocation?

Kind regards,

Michael

**Michael Hammond**  
Senior Planning Officer (Policy)  
Planning and Development

01473 432905

[michael.hammond@ipswich.gov.uk](mailto:michael.hammond@ipswich.gov.uk)  
Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1 2DE

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---

**From:** Suzanne Nugent <

**Sent:** 25 February 2020 11:20

**To:** PlanningPolicy <[PlanningPolicy@ipswich.gov.uk](mailto:PlanningPolicy@ipswich.gov.uk)>

**Subject:** Representation to Ipswich Local Plan Review Final Draft Consultation - Allocation IP011b - Ortona Properties Ltd

Dear Planning Policy Team

Please find attached a representation in relation to Smart Street/Foundation Street (Allocation IP011b) on behalf of Ortona Properties Ltd.

I would be grateful if you could acknowledge receipt of this representation.

Many thanks

Kind regards

Suzanne

**Suzanne Nugent Bsc (Hons) Msc MRPI**  
Planner  
(my usual working days are Tuesday, Wednesday and Thursday)



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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                               |                                                                                                                                                                                                                                            |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation document(s) to which this comments form relates: | <b>Ipswich Local Plan Review Final Draft – Site Allocations and Policies</b>                                                                                                                                                               |
| Please return this comments form to:                          | <u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or<br><br>Planning Policy Team<br>Planning and Development<br>Ipswich Borough Council<br>Grafton House<br>15-17 Russell Road<br>Ipswich<br>IP1 2DE |
| Return by:                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                            |
| This form has two parts:                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                   |

#### PART A PERSONAL DETAILS

|                                        | <b>1. Personal details</b> | <b>2. Agent's details (if applicable)</b>           |
|----------------------------------------|----------------------------|-----------------------------------------------------|
| Title                                  |                            | Mrs                                                 |
| First name                             |                            | Suzanne                                             |
| Last name                              |                            | Nugent                                              |
| Job title ( <i>where relevant</i> )    |                            | Planner                                             |
| Organisation ( <i>where relevant</i> ) | Ortona Properties Ltd      | PlanSurv Ltd                                        |
| Address<br>(Please include post code)  | c/o PlanSurv Ltd           | 76 Broad Street<br>Ely<br>Cambridgeshire<br>CB7 4BE |
| E-mail                                 | c/o PlanSurv Ltd           | -                                                   |
| Telephone No.                          | c/o PlanSurv Ltd           | -                                                   |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                                                                 |
|----------------------------------------------------------------------|-----------------------------------------------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Suzanne Nugent, PlanSurv Ltd on behalf of Ortona Properties Ltd |
|----------------------------------------------------------------------|-----------------------------------------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.        | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IP011b Smart Street/Foundation Street | The landowner (Ortona Properties Ltd) supports the allocation for the residential use of the site. The current use of the site remains as a bus depot under a lease agreement, but could come forward for development between the middle to end of the plan period. The site provides important linkage for the redevelopment of Merchants Quarter and would provide improved frontage along Star Lane, which in turn would provide visual enhancement to the Central and Wet Dock Conservation Areas. |
|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

| Document(s) and document part | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |
|-------------------------------|--------------------------------------------------------------------------------------------------------------|
|                               |                                                                                                              |
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|                               |                                                                                                              |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.

Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.

Adoption of the Ipswich Local Plan Review.

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Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Felicia Blake**

---

**From:** Suzanne Nugent  
**Sent:** 25 February 2020 11:26  
**To:** PlanningPolicy  
**Subject:** Representation to Ipswich Local Plan Review Final Draft Consultation - Merchants Quarter/Allocation IPO54b - Ortona Properties Ltd  
**Attachments:** Ipswich Local Plan Review Final Draft\_Merchants Quarter IPO54b.pdf; Site Plan to representation IPO54b.pdf

Dear Planning Policy Team

Please find attached a representation in relation to Merchants Quarter/Allocation IPO54b on behalf of Ortona Properties Ltd. This comprises the response form and accompanying site plan.

I would be grateful if you could acknowledge receipt of this representation.

Many thanks

Kind regards

Suzanne

**Suzanne Nugent Bsc (Hons) Msc MRTPI**  
**Planner**  
(my usual working days are Tuesday, Wednesday and Thursday)



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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



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Planning and Development  
Ipswich Borough Council  
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| <b>Please return this comments form to:</b>                          | <b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b><br><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                     |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><b>Part B – Your comment(s).</b>                                                                                                                                                                                |

| <b>PART A PERSONAL DETAILS</b>                |                              |                                                               |
|-----------------------------------------------|------------------------------|---------------------------------------------------------------|
|                                               | <b>1. Personal details</b>   | <b>2. Agent's details (if applicable)</b>                     |
| <b>Title</b>                                  |                              | <b>Mrs</b>                                                    |
| <b>First name</b>                             |                              | <b>Suzanne</b>                                                |
| <b>Last name</b>                              |                              | <b>Nugent</b>                                                 |
| <b>Job title (where relevant)</b>             |                              | <b>Planner</b>                                                |
| <b>Organisation (where relevant)</b>          | <b>Ortona Properties Ltd</b> | <b>PlanSurv Ltd</b>                                           |
| <b>Address<br/>(Please include post code)</b> | <b>c/o PlanSurv Ltd</b>      | <b>76 Broad Street<br/>Ely<br/>Cambridgeshire<br/>CB7 4BE</b> |
| <b>E-mail</b>                                 | <b>c/o PlanSurv Ltd</b>      |                                                               |
| <b>Telephone No.</b>                          | <b>c/o PlanSurv Ltd</b>      |                                                               |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                                                                 |
|----------------------------------------------------------------------|-----------------------------------------------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Suzanne Nugent, PlanSurv Ltd on behalf of Ortona Properties Ltd |
|----------------------------------------------------------------------|-----------------------------------------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.                       | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Opportunity Area-Merchants Quarter/Allocation IP054b | <p>The Cattlemarket bus station is included within the opportunity area for Merchants Quarter, however the allocation reference IP054b should be extended north to include the bus station. The Local Plan states that the redevelopment of Merchants Quarter would provide key linkages from the Waterfront area to the centre of town. Therefore, the possible future redevelopment of part or all of the site could enhance connectivity by providing a pedestrian friendly residential/retail/employment area to link Turret Lane to Dogs Head Lane and the Buttermarket Shopping Centre.</p> <p>The land (as outlined in red on the attached plan) is currently under lease as its current bus station use, however given the wider regeneration aims for this area, the allocation IP054b should be extended north to include the whole of the opportunity area to allow for comprehensive redevelopment of the site. This would ensure that the plan remains flexible over the entire plan period, particularly towards the end of the plan period to allow for future residential/retail/employment use to come forward and thus ensure that the plan is sound.</p> |
|                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

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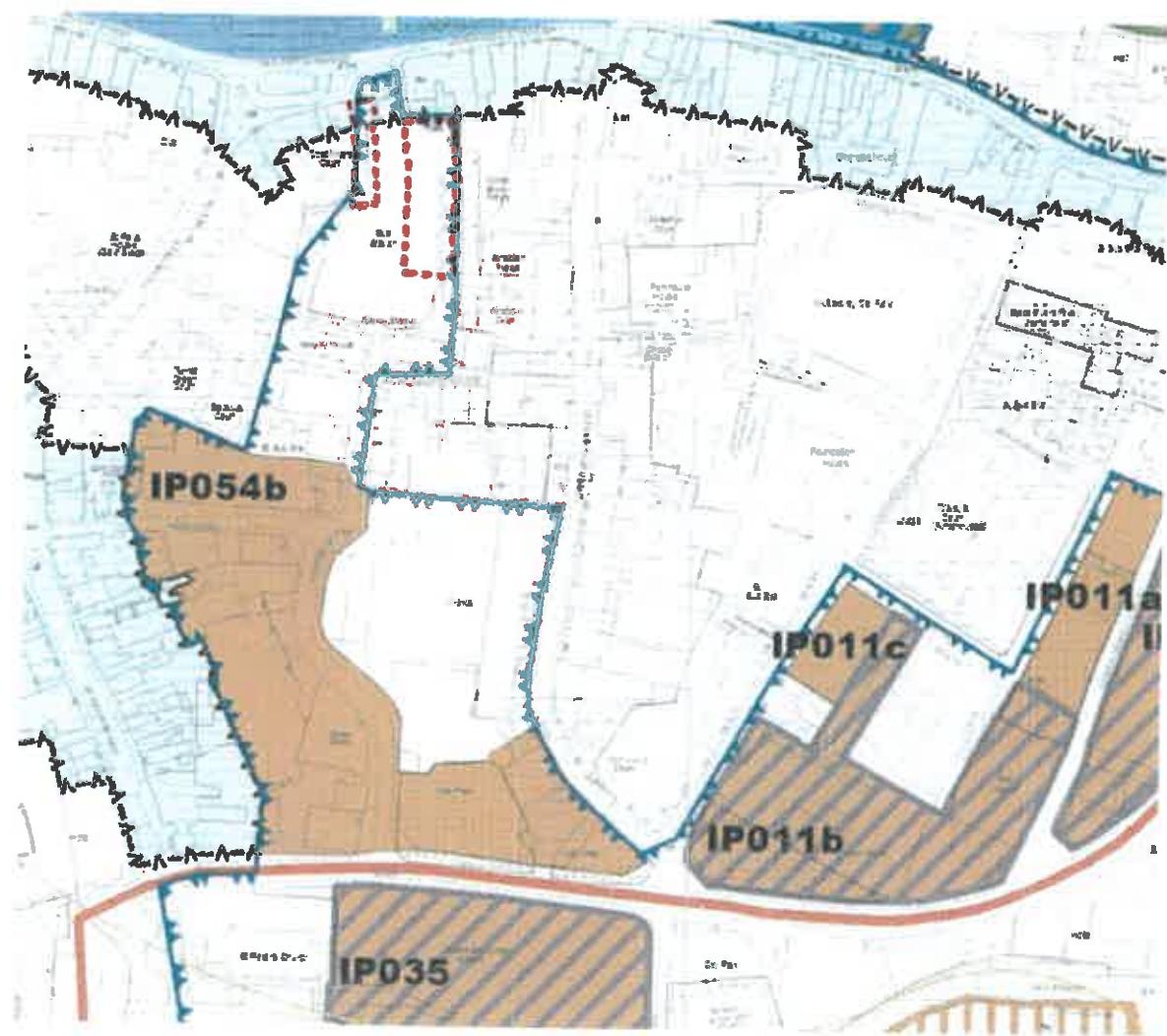
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As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Proposed allocation- Cattlemarket Bus Station**



— Ortona Properties Ltd land ownership

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**P**



**Felicia Blake**

---

**From:** dogol peezon  
**Sent:** 28 February 2020 09:16  
**To:** PlanningPolicy  
**Subject:** IP354 (72 old boatyard)

Dear Sir/Madam

Reference IP354 (72 old boatyard) Cullingham rd.

I write in connection with the above proposed planning application, I have examined the plans and I know the site well and wish to object strongly to the development of this land for housing. This would have an impact on the already busy road as well as having detrimental effect on the wildlife around the river bank. (Crested Newts). My property would also be overlooked by the development resulting in loss of privacy. Noise pollution from the said development would also have an impact. Cullingham rd has already issues with parking and this development would make this situation even worse. Access to the site for heavy machinery would be impossible as the road is not wide enough. Also the drainage and sewage from this new site will have significant overload on the already overcrowded road. I trust that the above objections will be taken fully into account in determining this application.

your sincerely

Margaret Pearson

**Felicia Blake**

---

**From:** Melville-Claxton, James  
**Sent:** 02 March 2020 11:45  
**To:** PlanningPolicy  
**Subject:** FW: Permission Homes Suffolk ipswich Borough Council Final Draft Local Plan representation  
**Attachments:** Persimmon Homes Suffolk representation.pdf

Please find attached a PDF version of the persimmon Homes representation on the IBC Final Draft Local Plan

Kind regards

James Melville-Claxton

Planner

Persimmon Homes Suffolk

Persimmon House

Orion Court

Great Blakenham

Ipswich

Suffolk

IP6 0LW

[www.persimmonhomes.com](http://www.persimmonhomes.com)

[www.charleschurch.com](http://www.charleschurch.com)

---

**From:** Melville-Claxton, James  
**Sent:** 02 March 2020 11:43  
**To:** 'PlanningPolicy@ipswich.gov.uk' <PlanningPolicy@ipswich.gov.uk>  
**Subject:** Permission Homes Suffolk ipswich Borough Council Final Draft Local Plan representation

**Persimmon Homes representation on the Ipswich Local Plan review final draft consultation.**

This representation is made by Persimmon Homes on the Final Draft of the Ipswich Borough Local Plan Review published for consultation between the 15<sup>th</sup> January and 2<sup>nd</sup> March 2020. Representations at this stage should only be made in relation to the legal compliance and soundness of the Final draft of the Local Plan, and using appropriate tests for soundness which a Local Plan must satisfy, it is considered that the Final Draft Plan is not Positively Prepared, Justified, or Effective for the reasons set out below.

### **Tests of Soundness**

The tests for soundness are set out in the 2019 revised National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:

- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

### **CS1 – Presumption In favour of Sustainable Development.**

The Revised NPPF confirms that the presumption in favour of sustainable development does not trump the statutory presumption in favour of the development plan set out in s38(6) of the Planning and Compulsory Purchase Act 2004. The wording of which is detailed at paragraph 2.2 of the final draft of the Core strategy and policies development plan. As such the inclusion of the model wording in Local Plans is no longer required. It is reasonable to consider that policy CS1 is not consistent with the National Policy and should be removed, in addition no robust justification for its continued inclusion in the document has been provided.

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Policy DM7 proposes minimum standard areas for private outdoor amenity space, but no evidence could be found that supports the figures detailed, including within local design guides. In addition the application of such standards varies between neighbouring authorities, which would reasonably call into question whether this policy has been adequately justified and is consistent with National Policy, whilst also being effective over the plan period. Where the policy details that lower figures may be acceptable where there is unavoidable conflict with the need to meet density requirements, additional flaws in its effectiveness arise due the questionability of how site densities are calculated given the current limited weight given to market forces and demands for different types of dwellings. In addition it is recognised that the extent of overlooking would be assessed on a case-by-case basis, which is an approach that is welcomed. However, whilst flexibility built into the adopted policy is welcomed, within the supporting text titles of recognised published technical guidance on this matter to provide continuity in the assessment of this issue would be welcomed.

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Yours sincerely,

l

**James Melville - Claxton  
Planner  
Persimmon Homes (Suffolk) Ltd**

[www.persimmonhomes.com](http://www.persimmonhomes.com)

[www.charleschurch.com](http://www.charleschurch.com)

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Persimmon Homes is proud to support local communities. Every year our Community Champions scheme donates £750,000 to local groups and our Building Futures scheme supports young people with donations of over £1 million. [Find out more...](#)



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Persimmon Homes Suffolk

Persimmon House

Orion Court

Great Blakenham

Ipswich

Suffolk

IP6 0LW

[www.persimmonhomes.com](http://www.persimmonhomes.com)

19<sup>th</sup> February 2020

Planning Policy,  
Planning and Development,  
Ipswich Borough Council,  
Grafton House,  
15-17 Russell Road,  
Ipswich,  
IP1 2DE.

**Persimmon Homes representation on the Ipswich Local Plan review final draft consultation.**

This representation is made by Persimmon Homes on the Final Draft of the Ipswich Borough Local Plan Review published for consultation between the 15<sup>th</sup> January and 2<sup>nd</sup> March 2020.

Representations at this stage should only be made in relation to the legal compliance and soundness of the Final draft of the Local Plan, and using appropriate tests for soundness which a Local Plan must satisfy, it is considered that the Final Draft Plan is not Positively Prepared, Justified, or Effective for the reasons set out below.

**Tests of Soundness**

The tests for soundness are set out in the 2019 revised National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:

- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

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**Yours sincerely,**

**James Melville - Claxton  
Planner  
Persimmon Homes (Suffolk) Ltd**

**Felicia Blake**

88

**From:** Ella Murfet  
**Sent:** 02 March 2020 15:09  
**To:** PlanningPolicy  
**Cc:** Sophie Pain  
**Subject:** Ipswich Regulation 19 Consultation Response - Pigeon  
**Attachments:** Pigeon IBC Reg 19 Consultation Form.pdf; Pigeon IBC Reg 19 Consultation Response.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/Madam

Please find attached to this email a form and representation written on behalf of Pigeon to the Ipswich Borough Council Regulation 19 consultation.

I trust that this submission will be taken into account. If you could confirm receipt it would be appreciated. If you feel that you need any additional information or would like to discuss further, then please do not hesitate to contact me.

Kind regards  
Ella

Ella Murfet  
Senior Planner

## Turley

8 Quy Court,  
Colliers Lane  
Stow-cum-Quy  
Cambridge CB25 9AU

[turley.co.uk](http://turley.co.uk)  
Twitter  
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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation document(s) to which this comments form relates: | <ul style="list-style-type: none"> <li>Core Strategy and Policies Development Plan Document Review Final Draft (January 2020)</li> <li>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft (January 2020)</li> <li>Statement of Compliance with the Duty to Co-Operate (January 2020)</li> <li>Statement of Common Ground (January 2020)</li> </ul> |
| Please return this comments form to:                          | <p><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</p> <p>Planning Policy Team<br/>     Planning and Development<br/>     Ipswich Borough Council<br/>     Grafton House<br/>     15-17 Russell Road<br/>     Ipswich<br/>     IP1 2DE</p>                                                                                                                                     |
| Return by:                                                    | 11.45pm Monday 2 <sup>nd</sup> March 2020                                                                                                                                                                                                                                                                                                                                                                          |
| This form has two parts:                                      | <p>Part A – Personal details</p> <p>Part B – Your comment(s).</p>                                                                                                                                                                                                                                                                                                                                                  |

#### PART A PERSONAL DETAILS

|                                       | 1. Personal details                                                       | 2. Agent's details (if applicable)                                    |
|---------------------------------------|---------------------------------------------------------------------------|-----------------------------------------------------------------------|
| Title                                 | Mr                                                                        | Miss                                                                  |
| First name                            | Andrew                                                                    | Ella                                                                  |
| Last name                             | Fillmore                                                                  | Murfet                                                                |
| Job title (where relevant)            | Senior Planning Manager                                                   | Senior Planner                                                        |
| Organisation (where relevant)         | Pigeon Investment Management Ltd                                          | Turley                                                                |
| Address<br>(Please include post code) | Linden Square<br>146 Kings Road<br>Bury St Edmunds<br>Suffolk<br>IP33 3DJ | 8 Quy Court<br>Colliers Lane<br>Stow-cum-Quy<br>Cambridge<br>CB25 9AU |
| E-mail                                |                                                                           |                                                                       |
| Telephone No.                         |                                                                           |                                                                       |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation (*and client if you are an agent*):

Ella Murfet, Turley

Pigeon Investment Management Ltd

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |
|--------------------------------|--------------------------------------------------------------------------------------------------------------|
|                                | <p>Please see accompanying statement.</p>                                                                    |
|                                |                                                                                                              |
|                                |                                                                                                              |
|                                |                                                                                                              |

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.

Yes

Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.

Yes

Adoption of the Ipswich Local Plan Review.

Yes

**PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Representations to the Ipswich Local Plan  
Regulation 19 Consultation  
Ipswich Borough Council**

February 2020



Turley

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Ella Murfet  
ella.murfet@turley.co.uk

Client  
Pigeon Investment Management Limited

Our reference  
PIGC3021

19 Feb 2020

# **1. Introduction and Background**

- 1.1** This Statement has been prepared on behalf of Pigeon Investment Management Limited ('Pigeon'). It is in response to the Regulation 19 Consultation on the Draft Ipswich Local Plan. The comments made follow on from Pigeon's representation to the previous Regulation 18 Consultation on the Preferred Options Consultation In March 2019.
- 1.2** This submission does not seek to promote any specific sites for development, but rather contains responses in light of Pigeon's wider land interests. The overriding point that Pigeon wish to raise as part of the consultation, is that Ipswich Borough Council should be looking to neighbouring authorities in order to assist them with meeting their housing need. The Draft Local Plan raises concerns on the deliverability of housing, and therefore the 'soundness' of the document in line with the tests set out in paragraph 35 of the National Planning Policy Framework (NPPF).
- 1.3** This Statement contains responses on behalf of Pigeon to both the Core Strategy and Policies Development Plan Document Review Final Draft (January 2020) and the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft (January 2020). Comments are also made on the Statement of Compliance with the Duty to Co-Operate (January 2020) and the Statement of Common Ground (January 2020). This Statement is subsequently split to reflect the documents.

## **2. Duty to Co-operate**

- 2.1 Ipswich Borough Council forms part of the Ipswich Housing Market Area (IHMA) and Ipswich Functional Economic Area (IFEA), which also encompasses the former District of Suffolk Coastal District Council (now part of East Suffolk Council), Babergh District Council and Mid-Suffolk District Council. In accordance with the Localism Act 2011 and Paragraph 24 of the NPPF these local authorities are under a Duty to Co-operate with each other on strategic matters that cross administrative boundaries.
- 2.2 Paragraphs 25 and 26 of the NPPF state that:
- ‘25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.
26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.’
- 2.3 From the earliest stages of the plan making process, the local authorities within the ISPA have been aware of the pressing issue relating to the unmet housing needs that will arise from Ipswich over the plan period. Indeed, the consideration of this issue is clearly expressed through the policies of the adopted Ipswich Local Plan (Policy CS6 ‘The Ipswich Policy Area’ and Policy CS7 ‘The Amount of Housing Required’).
- 2.4 This issue is also highlighted in the Inspector’s Report on the Examination of the Ipswich Local Plan, dated January 2017. At Paragraph 32 the Inspector concluded that:
- ‘Fundamentally, given the circumstances which the Ipswich Policy Area authorities currently find themselves in, there would be much to gain from the adoption of the submitted plans (subject to necessary modifications) as soon as possible. At the same time there would be likely to be little to lose in terms of getting firm proposals in place to address potential unmet housing needs. Consequently, adoption of the plans modified to require review to determine and deliver housing needs across the HMA for the long term, is thus soundly based.’
- 2.5 As part of Pigeon’s representations to the Regulation 18 Consultation, support was set out for the fact that a Duty to Co-operate Statement and working draft Statement of Common Ground (November 2018) had been published alongside the Ipswich Local Plan Review.
- 2.6 Within the Core Strategy and Policies Development Plan Document Review – Preferred Options (November 2018) the Council set out that they are actively engaged with Suffolk County Council and the neighbouring councils of East Suffolk, (Suffolk Coastal / Waveney Councils) and Babergh / Mid Suffolk on strategic growth matters, through the Ipswich Strategic Planning Area Board. The Ipswich Strategic Planning Area (ISPA) is an area that

has long been used for strategic planning purposes around Ipswich and consists of the Borough Council area plus a number of surrounding parishes.

2.7 It added that work is being undertaken through the Ipswich Strategic Planning Area Board which includes joint evidence gathering and agreement on joint approaches to the scale and distribution of future growth, cross boundary green infrastructure and strategic transport matters.

2.8 The Core Strategy and Policies Development Plan Document Review Final Draft (January 2020) retains this text, and as such Pigeon continue to support this approach.

2.9 The Statement of Common Ground (January 2020) again sets out that one of the strategic cross-boundary matters to be addressed is 'agreeing the approach to the delivery of the housing requirement'. In a variation to the draft version, the document states that:

'Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum housing number it is intending to deliver in its own area. Where, through the production of a Local Plan, it is evident that the need cannot be met within the local authority's boundary, a comprehensive re-assessment of land supply and deliverability will be undertaken. Following a comprehensive re-assessment of land supply and deliverability, and where unmet need remains, the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan. An appropriate approach will be dependent upon the scale of unmet need and the current status of other Local Plans in the ISPA'.

2.10 The document goes on to state that:

'as per paragraph 75 of the 2019 NPPF, Housing Action Plans will provide a mechanism for identifying actions to increase delivery where delivery falls below 95% of an authority's housing requirement (calculated over the previous three years). Each individual local authority may produce Housing Action Plans if required to do so by Government, and Councils may collaborate on the production of Housing Action Plans to support housing supply and delivery across the ISPA. The ISPA Board can consider any common or cross-boundary themes between two or more authorities.'

2.11 The Council have also published a Statement of Compliance with the Duty to Co-Operate (January 2020). As part of Pigeon's representations to the Regulation 18 Consultation, concerns were raised by Pigeon that the Council were not following their Duty to Co-operate, of working with neighbouring authorities to deliver a proportion of their housing requirements.

2.12 Within the Statement of Compliance with the Duty to Co-Operate (January 2020) the Council have stated that:

**'Ipswich Borough Council has demonstrated a significant level of co-operation with other authorities and public bodies in the preparation of the Final Draft Ipswich Local Plan. The Council has participated in and continues to participate in joint projects with other authorities on key evidence base documents and through regular meetings of the Ipswich Strategic Planning Area Board. The Council continues to work closely with key infrastructure providers to ensure the Local Plan will deliver the infrastructure required to support development in Ipswich Borough. It must be recognised that working with other bodies on strategic planning issues is an ongoing process and this statement will be updated periodically to reflect further progress.'**

- 2.13 The document then goes on to list the topics which are strategic cross boundary matters subject to the duty, and this includes housing. Table 1 sets out the strategic issue of housing, provides a summary of the Duty to Co-operate process. This table acknowledges that 'Ipswich Borough is tightly bounded and there is limited scope to meet housing needs solely within the Borough itself'. The Council therefore clearly recognise that the Council are unlikely to meet all of their housing needs in the Borough.
- 2.14 It is highlighted in the Statement of Compliance with the Duty to Co-Operate (January 2020) that a new policy (ISPA4) has been included in the Core Strategy and Policies Development Plan Document Review Final Draft (January 2020), and this is assessed in more detail in a subsequent section of this representation.
- 2.15 Overall Pigeon consider that the Statement of Compliance with the Duty to Co-Operate (January 2020) fails to demonstrate that the Council are complying with their Duty to Co-Operate, as the Council are not seeking to deliver enough of their housing requirements outside of the Ipswich Borough Council area.

### **3. Core Strategy and Policies Development Plan Document Review Final Draft (January 2020)**

#### **Policy ISPA4 – Cross Boundary Working to Deliver Sites**

- 3.1 Pigeon support the Council's inclusion of a policy that relates to the delivery of sites outside of the Borough. However, this policy remains almost the same as its version in the previous document, only including a little more detail. Furthermore, this policy relates solely to site ISPA4.1. It does not therefore provide any general policy support or guidance for delivering Ipswich Borough Council's housing need for 8,010 homes (Policy CS7), outside of the authority area, particularly given the stepped housing trajectory with less homes delivered at the start of the plan period.
- 3.2 The Site Sheet for ISPA4.1 sets out that the development would need to be 'delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure that there is sufficient infrastructure capacity to meet demand'. The Ipswich Garden is assessed with further commentary within this representation, and in line with the conclusions of this, it is considered that reliance on the Ipswich Garden Suburb puts site ISPA4.1 at risk of delay.

#### **Policy CS2 – The Location and Nature of Development**

- 3.3 Pigeon support that this policy recognises under point (c) the need for Ipswich Borough Council to work with neighbouring authorities to address housing need within the Ipswich Housing Market Area (IHMA). Notwithstanding this, Pigeon object to the fact that this ambition still does not appear to be implemented in the Council's proposals for housing development.
- 3.4 The subtext to the policy sets out that the central urban focus to the location of development also reflects the sequential approach to site selection required by the NPPF (which encourages the use of previously developed land). However, Pigeon still seriously dispute the Council's ability to deliver housing on many of the brownfield sites, which are discussed in further detail in the following section of this report.
- 3.5 Within the policy subtext the Council add that later in the plan period after 2031, the Council's housing land supply opportunities within the Borough boundary become more limited. Therefore, there will be a need to consider future development opportunities beyond the boundaries within the neighbouring local authorities, particularly given the stepped housing trajectory with less homes delivered at the start of the plan period. In the first instance Pigeon are of the view that housing opportunities within the Borough are currently limited, and that there is a present need to consider sites beyond the boundary. This is evidenced by the statement made by the Council in the Statement of Compliance with the Duty to Co-Operate (January 2020) previously referenced in paragraph 2.10 of this representation, where they acknowledge the tight boundary and limited scope for housing. It is therefore considered that the Council are contradictory in their assessment, with there clearly being limited scope now, and not just after 2031.

- 3.6 In any case, there also does not appear to be any further evidence as to how housing will be delivered later in the plan period, and as such Pigeon have fundamental concerns that the Council have not explored these opportunities any further.
- 3.7 It is recommended that Ipswich Borough Council should look to sustainable locations which have good infrastructure, high accessibility to settlements with employment opportunities and connectivity to Ipswich. For example, neighbouring satellite villages around Ipswich such as Claydon, Sroughton and Wherstead can assist in delivering the housing growth to meet the objectively assessed need for housing in the Borough. These areas are well connected to Ipswich.

**Policy CS7 – The Amount of Housing Required**

- 3.8 Policy CS7 proposes a housing requirement for 8,010 homes in Ipswich across the period 2018-36. A detailed assessment of housing and economic needs have been produced by Pegasus Group on behalf of Pigeon, and this is contained within Appendix 1 of this representation.
- 3.9 The assessment concludes that Policy CS7 does not represent positive planning; it is not justified being contrary to the available evidence; it will not be effective in meeting demographic, economic or affordable housing needs; and it is inconsistent with the NPPF as well as numerous sections of the PPG.
- 3.10 In order to address this, the assessment concludes that it will be necessary to identify the housing need necessary to meet demographic and economic needs without increasing the need to travel as well as considering whether additional provision should be made to support affordable housing delivery and then setting a housing requirement which provides for the necessary significant boost to supply. The available evidence indicates that this is likely to result in a need for in excess of 11,500 homes in Ipswich.
- 3.11 In their assessment, Pegasus Group then conclude that having identified the housing need, it will then be necessary to consider whether this can be met within the Borough or whether it is appropriate to progress the Core Strategy Review with a constrained housing requirement with the remaining need to be met in the neighbouring authority area.
- 3.12 Policy CS7 sets out a policy with the minimum housing number that Ipswich Borough Council proposes to deliver in its area. The Housing Land Supply only amounts to a total of 7,214 dwellings, including an allowance for windfall development. Therefore, the Council already acknowledge that they have an unmet housing need of 1,597 dwellings over the Plan period, taking into account the 10% contingency that is allowed for in the final paragraph of the policy. Steps should therefore be taken with the ISPAB to now identify locations outside the boundary of Ipswich Borough Council where this unmet need can be accommodated. It is also considered by Pegasus Group that the proposed stepped housing requirement if supported provides no justification for not meeting housing needs in a timely fashion across the IHMA. Accordingly, if the stepped housing requirement is considered appropriate it will be necessary for corresponding stepped housing requirements (with a greater number in the early years to offset the lower number in Ipswich) in neighbouring LPAs to ensure that the existing housing backlog is addressed as soon as possible and to ensure that housing delivery does not continue to

**lag behind need as has been the case in Ipswich as reflected in the Housing Delivery Test result.**

#### **Policy CS10 – Ipswich Garden Suburb**

- 3.13 This urban extension is proposed to the north of the Ipswich Town. The policy text makes reference to the fact that this is the only area of extensive greenfield land still available within the Borough for development, due to the tight urban boundary. This demonstrates how limited the development opportunities within Ipswich Borough are.**
- 3.14 There is an adopted SPD for this site, and within this it states that ‘the success of the development of the Garden Suburb will depend to a large extent on the continued partnership working of the landowners, IBC and other key stakeholders to secure delivery’. This site is therefore reliant on multiple landowners coming forward and Pigeon would therefore argue that this complication will significantly delay the delivery of the development during the plan period. This concern should be afforded significant weight by the Council given that the Garden Suburb accounts for around half of the supply of housing.**

#### **Summary**

- 3.15 Therefore Pigeon retain the view that, whilst there appears to be much mention of Ipswich Borough Council working with neighbouring authorities, this does not appear to materialise into any real contribution to delivering housing outside of the Ipswich Borough Council area during the plan period. Despite the comments made by Pigeon previously as part of the Regulation 18 Consultation, the Council do not appear to have given these any significant weight.**
- 3.16 In addition, it is of significant concern that the Council are clearly unable to meet their housing need requirements (and the level of affordable housing needs within Ipswich) within the plan period in their own authority area and that the Plan does not address this issue accordingly.**

## **4. Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft (January 2020)**

- 4.1 This commentary focuses specifically on the residential site allocations that are proposed by the Council under this document. It does not form a detailed assessment of each individual allocation, but rather provides broad comments, and draws upon examples where appropriate. Pigeon made the argument in response to the Regulation 18 Consultation that many of the sites proposed for allocation cannot be considered deliverable under the definition provided in Annex 2 of the NPPF, and this is still considered to be the case.
- 4.2 The Council have had an Independent Whole Plan Viability Study (Aspinall Verdi, January 2020) undertaken and which now forms part of the evidence base, and there are concerning conclusions within the study. Not least at paragraph 8.18 where it is identified that the viability testing results on larger sites, including two brownfield sites (IP226 Helena Road/Patteson Road) and IPO37 (Island Site) have been shown to be unviable and that the Council will need to take a flexible approach to policies on these sites. Such conclusions are therefore already casting doubt over whether these two sites, which cumulatively are allocated for 758 dwellings, can be delivered within the Plan period.
- 4.3 The vast majority of sites proposed for allocation are previously developed land. Most of these sites appear to have contamination constraints and the Council do highlight this. Survey and remediation work will therefore inevitably delay the completion of development on such sites, which Pigeon flag up as an issue with the strategy. This is also likely to reduce the provision of affordable housing.
- 4.4 Furthermore the majority of these sites rely on relocation of other uses before the sites can be delivered. Those that will require relocation include businesses, various types of depots, Council services etc. There does not appear to be any evidence in most cases that relocation sites have been found or secured. Some of these existing establishments are fairly large scale facilities and so it is unclear where the space for these will be, particularly when so much development is being directed to other previously developed sites, and the Council acknowledge that greenfield sites are limited.
- 4.5 Pigeon therefore object to the amount of housing that is proposed on existing employment sites where uses will need to be relocated. If businesses are placed under pressure to relocate or displaced altogether then this would contravene economic development aspirations set out within the Plan. If businesses are not however willing, or are indeed put under pressure to relocate, then these sites cannot reasonably be considered as deliverable.
- 4.6 An example of this is the Bus Depot, Sir Alf Ramsey Way (IP004) which is allocated for 48 dwellings and 5,000sqm office space. The Site Sheet for this allocation states that there is a 'need to relocate the bus station first', and there is no confirmation that this has been attained. A further Depot and Beaconsfield Road (IP105) has been allocated for 15

dwellings. The Site Sheet for this allocation also states that there is a 'need to relocate the existing business first', and again there is no evidence that this is a realistic prospect.

- 4.7 A particularly complicated employment site is on Felixstowe Road (IP010b) which contains various employment uses and multiple owners according to the Site Sheet. This has been allocated for 62 dwellings and states that 'redevelopment is dependent on existing uses being relocated'. Given the multiple ownerships it would appear that this site will be a difficult one to progress, as not all occupants may want to relocate, particularly when it is unclear where they would be relocating to.
- 4.8 Land to the West of West End Road (IP120b) currently contains car showrooms, and has been allocated for 103 dwellings. Notwithstanding the constraints that this site is likely to have in terms of amenity impact of a commercial location, the Site Sheet also states that the 'existing uses would need to relocate'. There is no evidence that the occupants would be willing to relocate, and this seems unlikely given the location of the site.
- 4.9 Some of the proposed allocation sites are currently open space, amenity land or recreation grounds. There would either therefore be a loss of this space, or indeed provision would need to be reprovided. Again, there is no evidence that alternative sites have been found and if these would relate well to the parts of the community that would lose them. Pigeon object to this approach as allocating these sites will result in unacceptable and irreplaceable loss of open space for members of the public.
- 4.10 Many of the sites are car parks and constraints have been raised that parking would need to be reprovided, again with no indication that this has been considered, other than in a couple of examples where there is mention of an element of parking needing to remain on the sites. Pigeon are concerned that in order to deliver these sites, much needed car parking in the city will be lost, displacing cars and putting further pressures on road parking.
- 4.11 For example, the Car Park at Burrell Road (IP031a) is allocated for 20 dwellings. Covering an area of 0.44ha this provides a significant amount of car parking. It is not acknowledged on the Site Sheet how this provision would be replaced. A further example is Land between Old Cattle Market & Star Lane (IP054b) for which a large part of the site is currently used for car parking. The Site Sheet states that 'possible public car parking' would be included as part of the development, which does not provide any requirement for such a provision. It is considered that the loss of this facility would be of harm, given its location in the centre of Ipswich. A similar conclusion can be drawn from the allocation of a car park on Waterworks Street (IP089), for 23 dwellings. Again located in the centre of Ipswich with no apparent re-provision of the facility. All of these sites will add up to a significant loss of parking in the centre of Ipswich.
- 4.12 Several of the sites appear to be within industrial or commercial areas of the city which may have amenity issues for residents. This will be a constraint on any planning application that comes forward on such sites, and may limit the amount of development that can be delivered.
- 4.13 An example of this is the existing commercial building on Star Lane (IP043) which has been allocated for 50 dwellings. The Site Sheet sets out that the site is within the 'Urban Core' of Ipswich. The site is bounded on all sides by roads, and is surrounded by

commercial development, including warehouses, a depot, a swimming pool and various public houses and bars along the Quay. As such there are very likely to be noise and air quality issues arising on the site when pursued for residential use.

- 4.14 Some of the sites appear to be in protected employment areas, which would seem to conflict with the intention behind the designation of these parts of the city.
- 4.15 Land between Holywells Road and Holywells Park (IPO64a) is an example of this. This site is currently in use as offices and light industrial, and is allocated for 66 dwellings. It is however within existing employment allocation E11 and there does not appear to be any justification as to why this site is no longer considered to warrant protection from loss of employment. It is also highlighted that the site is surrounded by office and industrial development to the north, south and west boundaries, with the nearest residential uses some distance away. It is therefore considered to be a completely inappropriate location for residential development. The Site Sheet appears to justify this by setting out that the industrial uses immediately to the west of the employment area are also proposed for residential land, and as such the use is not incompatible. It can only be assumed that the Council are referring to site IPO98, which is not adjacent to IPO64a, but is separated by industrial uses. The site is constrained in its own right due to the need for a gas governor to be relocated, but in any case, the inclusion of this site bears no justification for the allocation of IPO64a.
- 4.16 Finally, the majority of sites identified for allocation are described to have medium or long term delivery timescales, with a much smaller number of short term sites. This is not in accordance with paragraph 68 of the NPPF. Furthermore, even some of the short term sites are subject to constraints that are set out above, and as such Pigeon think that the conclusion that they could be short term is overoptimistic.

### Summary

- 4.17 Therefore, Pigeon consider that the majority of the sites that the Council has proposed for residential allocation are subject to significant constraints that could delay, or indeed, ultimately prevent their delivery. Whilst many of the sites highlighted may be of a small to medium scale, it is considered that when combined, their implications on housing delivery could be significant. In any case, these provide only a snapshot of the constraints that are likely to impact upon many of the sites that are proposed for allocation.
- 4.18 In particular, Pigeon do not consider the approach of relocation of existing uses, where there is no reassurance that these can be successfully located elsewhere, as an appropriate strategy for delivering housing in Ipswich. Pigeon therefore strongly object to this approach, and suggest that the Council follow their Duty to Co-operate, of working with neighbouring authorities to deliver a proportion of their housing requirements.
- 4.19 Pigeon would welcome the opportunity to meet with the Council to discuss how their portfolio of sites could assist the Council in meeting their housing need on sustainable sites, close to Ipswich, but within the neighbouring authorities.

**Appendix 1: Pegasus Group Ipswich Core  
Strategy and Policies Development  
Plan Document Review**

# **IPSWICH CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW**

**ON BEHALF OF: PIGEON INVESTMENT MANAGEMENT LIMITED**

## **Pegasus Group**

Pegasus House | Querns Business Centre | Whitworth Road | Cirencester | Gloucestershire | GL7 1RT

T 01285 641717 | F 01285 642348 | W [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

**DESIGN | ENVIRONMENT | PLANNING | ECONOMICS | HERITAGE**

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## 1. SUMMARY

### Introduction

1.1 Pegasus Group has been instructed to prepare representations on the housing and economic needs identified in the Ipswich Core Strategy and Policies Development Plan Document Review.

### Policy CS7

1.2 Policy CS7 proposes a housing requirement for 8,010 homes in Ipswich across the period 2018-36. This is based upon the minimum local housing need of the standard method, but no consideration has been given as to whether it is appropriate to exceed this minimum in Ipswich as required by the PPG.

1.3 The circumstances in Ipswich and across the Housing Market Area indicate that there is a need to exceed this minimum. In particular:

- there is a recent assessment of housing need which demonstrates that the standard method significantly understates the local housing need which is one of the explicit examples identified in the PPG (2a-010) which necessitates exceeding the minimum;
- the evidence demonstrates that there are significant flaws in the demographic projections which inform the standard method and so the use of the standard method is not justified by the evidence;
- the Council's consultants have identified that where the standard method is subject to such flaws this should not be relied upon in other LPAs;
- once these flaws are corrected, the evidence demonstrates that there is a need for **10,050 homes** just to meet demographic needs;
- the evidence also demonstrates that to support economic growth as required by paragraph 80 of the NPPF, even assuming that in-commuting increases significantly, there would be a need for **9,850 homes**;
- if as required by paragraph 103 of the NPPF the need to travel is not increased and the commuting rates of 2011 are maintained, there would be a need for circa **11,589 homes**;

- the proposed housing requirement does not meet affordable housing needs and no consideration has been given as to whether this should be increased in response as required by the PPG (67-001).
- 1.4 As a result, the proposed housing requirement does not represent positive planning and it will not be effective including because it does not meet demographic, economic or affordable housing needs and it relies upon a greater proportion of in-commuters than is currently experienced. It is not justified as it is directly contrary to the available evidence and contrary to the advice of the Council's consultants elsewhere. It is also not consistent with numerous parts of national policy and guidance.
- 1.5 Policy CS7 also proposes to step the housing requirement without any apparent consideration of the effects of doing so including that:
- there is a significant backlog of housing need as evidenced by the Housing Delivery Test result of 46% (1% above that which would currently automatically engage the tilted balance of paragraph 11d of the NPPF) which will not be addressed until late in the plan period under a stepped housing requirement;
  - the demographic evidence does not justify a stepped requirement as it indicates that the number of households will increase at a broadly consistent pace, such that the proposed stepped housing requirement will result in additional households being unable to access appropriate accommodation.
- 1.6 The only justification given for the stepped requirement is the reliance upon large strategic allocations which will not be able to deliver in the early years of the plan period. This may provide an appropriate justification but if so, it would be necessary to ensure that corresponding stepped housing requirements (with a greater requirement in the early years) was adopted across the remainder of the Housing Market Area to ensure that households were still able to access appropriate and necessary accommodation in close proximity to Ipswich. Without these corresponding stepped requirements housing needs will remain unmet which does not represent positive planning, it is not effective, and it is not justified and furthermore it would be contrary to national policy in paragraphs 7 and 23 of the NPPF.

- 1.7 Within Policy CS7 it is also identified that a contingency allowance of 10% above the housing requirement will be planned for in order to boost delivery. This is necessary to accord with paragraph 59 of the NPPF and so it should be included in the housing requirement in accordance with the findings of numerous Local Plan Inspectors nationally. Without this modification, Policy CS7 will not be required to boost delivery contrary to the NPPF.
- 1.8 Policy CS7 also alludes to the supply over the plan period but no trajectory is provided to enable this to be considered, contrary to paragraph 73 of the NPPF. Pegasus Group reserve the right to address this matter when the necessary evidence is made available.

Policy ISPA1

- 1.9 Policy ISPA1 identifies that Ipswich Borough will contribute to employment and housing delivery across the Housing Market Area. Whilst the objective is to be welcomed, Policy ISPA1 specifies the employment land and housing requirement to be achieved across the Housing Market Area which is beyond the scope of this Local Plan.
- 1.10 It will be necessary for economic and housing needs to be tested separately in each LPA through their Local Plan examinations. It would be premature to include these as yet untested figures, which will change in the light of new evidence including the annual changes to the standard method, in the Ipswich Core Strategy Review.

**2. INTRODUCTION**

- 2.1 Pegasus Group are instructed to submit the following representations to the Ipswich Core Strategy and Policies Development Plan Document Review.
- 2.2 These representations focus on the housing and economic needs and corresponding supply.

### 3. POLICY CS7

#### The minimum local housing need

- 3.1 Table 8.1 of the draft Core Strategy Review identifies that the standard method produces a minimum local housing need for 445 new homes per annum or a total of **8,010 homes** in Ipswich Borough over the period 2018-36.
- 3.2 The standard method provides only the minimum local housing need. It takes no account of economic needs or specialist housing needs including those in need of affordable housing<sup>1</sup>. It is therefore appropriate to ensure that the housing need appropriately reflects these factors to ensure that the needs of different groups are addressed as required by paragraph 61 of the NPPF and that conditions are created to support economic growth as required by paragraph 80 of the NPPF.
- 3.3 The PPG (2a-010) confirms that it is necessary to take account of other factors and identifies that the need will be greater than the figure identified by the standard method in circumstances including where previous assessments of need have identified that the need is significantly greater.
- 3.4 The PPG (2a-008) also identifies that the standard method will change periodically and that as this changes, as it will in March 2020 owing to the release of new affordability information, the revised figure will need to be taken into account unless the Core Strategy Review has already been submitted for examination. Depending upon the date of submission, it may therefore be necessary to revise the minimum local housing need accordingly.

#### The SHMA

- 3.5 The Council jointly commissioned PBA to prepare the Ipswich and Waveney Strategic Housing Market Assessment, May 2017 (SHMA) which has undertaken a detailed analysis of housing needs across the Housing Market Area. This identifies that the 2014 based household projections which inform the standard method in Ipswich are flawed, such that to provide for demographic growth alone there is a need for 519 homes per annum rather than 445 homes per annum identified by the standard method.

<sup>1</sup> Although it does take account of the affordability of market housing.

- 3.6 The reason that PBA consider that the official projections are flawed in Ipswich relates to the accuracy of the mid-year estimates which inform the projections. In the period 2001-11, the mid-year estimates in Ipswich significantly underestimated the actual population growth. The ONS sought to correct the components of change within the mid-year estimates to accord with the actual population growth identified by the Censuses but were unable to do so, and so accounted for the remaining difference through unattributable population change (UPC). PBA assume that the errors in the mid-year population estimates from 2001-11 will continue to infect the mid-year estimates after 2011 and that an adjustment needs to be made to these and the resulting projections to correct this error.
- 3.7 The 2014 based projections used within the standard method remain unchanged and are therefore subject to the same flaws as identified in the SHMA according to the evidence of the Council. It would therefore be contrary to the available evidence to rely upon these projections and use the standard method without adjustment.
- 3.8 The Councils then commissioned PBA to prepare the SHMA Update, January 2019. This suggests that as the SHMA was prepared in line with the former NPPF, it is no longer relevant in relation to the identification of housing need and that the standard method should be used instead. However, as the SHMA has found that the official projections used within the standard method are flawed, it would be inappropriate to rely upon these within the standard method.
- 3.9 The recommendation of PBA to Ipswich Borough Council to disregard the identified flaws in the projections is directly contrary to the advice of PBA to other LPAs where they have found the projections to be flawed. Pegasus Group were involved in a S78 appeal with Tendring Borough Council<sup>2</sup> last year and the Council were represented by PBA who produced and defended evidence to demonstrate that the official projections were flawed in that Council area, as PBA claim they are in Ipswich, and that as a result the standard method was unreliable and should be disregarded. The S78 Inspector accepted the recommendation of PBA and concluded that:

**"As set out above, the Council accepts that it cannot demonstrate a 5YHLS, according to the standard method by which local housing need must be calculated for the purposes**

<sup>2</sup> APP/P1560/W/18/3196412

of this appeal. This is because it must deliver 857 dwellings per annum (dpa)...

However, the Council disputes that this figure represents the true housing need of the District because the 2014 population and household formation projections are seriously flawed for Tendring as a result of acknowledged issues of Unattributable Population Change (UPC)...

The Council states that the true housing requirement is 541dpa, although it accepts that figure has been derived through a different methodology...

The Council acknowledges that this figure was developed through the former NPPF, which adopted a different methodology including how the backlog is accounted for and in terms of the uplift for affordability...

But the Council maintains that the requirement is 541dpa (not 857dpa) because the effect of UPC is continuing. This is because the standard method uses the official 2014-based official projections, which take a base period of 2009-2014 and roll forward the trends in that period into the future. I agree with the Council that because the base period included two Inter-Censal years, which were affected by UPC, the resultant projection itself is likely to be affected by those errors. If these errors in the MYEs continued after 2011 then the effect of the infection of the 2014-based projections by UPC is greater...

But I agree that the continuing errors in the population projections arising from UPC raise significant questions about the validity of the local housing need figure of 857dpa. I consider it likely that this figure is an overestimate of the true housing need in the District."

- 3.10 Therefore, the evidence demonstrates that the official projections used within the standard method is flawed such that the standard method should not be relied upon in Ipswich, in accordance with the advice of the Council's consultants to other LPAs within the East of England.

- 3.11 The SHMA demonstrates that there is a need for at least 11,420 homes in the period 2014-36 to meet demographic needs. In the period 2014-18, a total of 1,363 homes have been delivered in Ipswich and 13 non-student bedspaces in communal establishments according to the MHCLG Live Table. The PPG (63-016a) provides the appropriate conversion factor to calculate the number of homes that a bedspace in a communal establishment would release to the market. Using this conversion factor, 13 bedspaces in Ipswich would equate to 7 homes. Therefore, given the completion of the equivalent of 1,370 homes in

Ipswich, there is a minimum residual need for **10,050 homes** or 558 per annum across the plan period 2018-36.

**The economic needs**

- 3.12 The economic circumstances of Ipswich are analysed in Appendix 1 which demonstrates that the economy of Ipswich has performed well regardless of the comparative under-supply of housing since 2011.
- 3.13 The number of jobs generated has vastly exceeded the growth in the economically active population and this is likely to have contributed to:
- the significant growth in the distance travelled by workers as they travel from across the region and beyond to access the high value jobs in Ipswich;
  - potential congestion issues; and
  - the increase in house prices as workers from further afield seek to relocate to Ipswich.
- 3.14 These unsustainable trends should be addressed by providing a better balance between labour supply and jobs without constraining economic growth. This will require a significant boost to housing supply from that delivered in the past within the Ipswich Housing Market Area to both address the comparative shortfall in housing delivery which has occurred and to maintain an appropriate balance thereafter.
- 3.15 The SHMA however assumes that the Ipswich Housing Market Area will become significantly more dependent upon workers commuting in from elsewhere. In Appendix H of the SHMA it is identified that in net terms 4,790 workers out-commuted from Babergh to other LPAs in 2014 but that this is assumed to increase to 5,070 by 2036; that 7,450 workers in-commuted to Ipswich in 2014 and that this will increase to 10,530 by 2036; that 7,100 workers out-commuted from Mid Suffolk in 2014 and that this will reduce to 4,100 by 2036; and that 6,760 out-commuted from Suffolk Coastal in 2014 but that this will reduce to 3,620 by 2036. In total, the SHMA therefore assumes that there will be a need for an additional 3,080 commuters to Ipswich but that the number of net commuters from the remainder of the Housing Market Area will reduce by 5,860. This will therefore require an additional 8,940 net in-commuters to the Housing Market Area over the plan period to support the job growth of 37,070 necessary to support economic growth. This equates to 75.9% of the jobs being filled by

residents of the Housing Market Area as compared to the 85.4% which existed in 2011 according to Table 3.11 of the SHMA.

- 3.16 This represents a significant growth in the dependence of the Housing Market Area upon In-commuting to sustain economic growth. This Inherent assumption within the SHMA will further increase the distance travelled by workers, add congestion to the transport network and create additional competition for housing in the area with consequent adverse effects on the affordability of housing. These adverse effects should be addressed through an uplift to the housing requirement both within Ipswich and across the Housing Market Area. The assumption within the SHMA that the need to travel will be required to increase is directly contrary to paragraph 103 of the NPPF.
- 3.17 Even with this Inherent assumption that the economic growth of Ipswich will be sustained through increased reliance upon In-commuting, the SHMA identifies that to support economic growth alone, there is a need for 11,220 homes in the period 2014-36<sup>3</sup>. Against this, there is a residual need for **9,850 homes** or 547 homes per annum across the plan period 2018-36 to provide for economic growth alone.
- 3.18 If the levels of self-containment which were experienced in 2011 are maintained (85.4%), the 37,070 jobs would require 5,412 net In-commuters. The SHMA however assumes that the number of net In-commuters will increase by 8,940. This equates to an additional 3,528 than would be experienced if 2011 rates were maintained. Therefore, in order to prevent the assumed increase of net In-commuting and the consequent adverse Impacts, it would be necessary to provide accommodation in addition to that identified by the SHMA for the 3,528 net In-commuters.
- 3.19 The SHMA identifies that an additional 838 homes would support an additional 1,700 jobs. Based on this Indicative rate, it would be necessary for an additional 1,739 homes to accommodate the 3,528 assumed additional In-commuters. This would result in a residual need for circa **11,589 homes** or 644 per annum over the period 2018-36.

<sup>3</sup> =10,382+838 homes as Identified in Table 8.1 of the SHMA.

### Affordable housing needs

- 3.20 The PPG (67-001) Identifies that where the needs of specific groups exceeds or is proportionately high compared to the overall housing need, strategic policy making authorities will need to consider the extent to which these needs can be addressed including whether a higher level of overall housing need should be identified. The specific groups include those in need of affordable housing.
- 3.21 The SHMA Identified in paragraph 7.12 that the demographic need of 519 homes per annum would accommodate 500 households per annum in Ipswich and in Table 4.3d It is Identified that this would equate to 11,005 households over the period 2014-36.
- 3.22 Of these 11,005 households, Table 4.3d of the SHMA Identifies that 2,702<sup>4</sup> (or 25%) will be in affordable need and Table 4.8d Identifies that an additional 1,075 (or 10%) will be need of discounted home ownership or starter homes. This totals **3,777 households** in affordable need (or 34%).
- 3.23 The SHMA Update undertakes similar analysis in Table 4.3d and Identifies that 2,014<sup>5</sup> (or 26%) of 7,715 households will be in affordable need and Table 4.8d identifies that an additional 804 (or 10%) will be need of discounted home ownership or starter homes. This totals **2,818 households** in affordable need (or 37%).
- 3.24 Policy CS10 Identifies that 31% of the homes provided at the Garden Suburb will be provided as affordable housing. The Garden Suburb is planned to deliver a total of approximately 3,500 dwellings and would therefore provide 1,085 affordable homes.
- 3.25 Based on the Identified housing requirement for 8,010 homes Identified in Policy CS7, there is a residual requirement for 4,510 homes outside of the Garden Suburb. Policy CS12 Indicates that only 15% affordable housing will be sought on other sites of 15 dwellings or more in this area, which would provide a maximum of 677 affordable homes even if every home was delivered on a site of 15 dwellings or more and that it delivered a policy compliant level of affordable housing.

<sup>4</sup> =553+2,149

<sup>5</sup> =436+1,578

- 3.26 Therefore, the draft Core Strategy Review will provide a maximum of 1,762 affordable homes, which equates to only 22% of the housing requirement. In reality, the delivery of affordable housing will be significantly less as many homes will be built on small sites which are not required to make any contribution.
- 3.27 It is therefore evident that the policies of the Core Strategy Review do not provide sufficient scope to meet the needs of at least 2,818 households in affordable need according to the SHMA Update.
- 3.28 In such circumstances, the PPG requires that consideration is given to whether it is appropriate to increase the overall housing need to better respond to the identified needs for affordable housing. Whilst it may not be possible or pragmatic to meet the affordable needs in full, the actions which could be taken to increase delivery at least need to be considered, but this does not appear to have happened in Ipswich.

#### Housing requirement

- 3.29 The available evidence demonstrates that the minimum local housing need identified by the standard method is insufficient to accommodate the households that are expected to arise in the Borough, that it is insufficient to support the economy and that there is a need to increase the housing requirement to better respond to the affordable housing needs within the Borough.
- 3.30 Nevertheless, Policy CS7 proposes a housing requirement based on the standard method. The evidence demonstrates that this does not meet the minimum housing needs of Ipswich and the inevitable consequence of constraining the supply of housing to the standard method will result in significant adverse effects on the ability of households to access suitable accommodation (including affordable housing) and on the economy.
- 3.31 The housing need relied upon in Policy CS7 as drafted is unsound as:
- It is not positively prepared including because it does not meet the objectively assessed needs as required by paragraph 35a) of the NPPF;
  - It is contrary to the available evidence and is therefore not justified;

- It is not justified as it directly contradicts the advice of the Council's consultants to other LPAs;
- It will not be effective as it does not meet demographic needs, affordable housing needs or economic needs;
- It is inconsistent with national policy as it increases the need to travel contrary to paragraph 103 of the NPPF;
- It is inconsistent with national policy, including because it does not reflect the needs of those in affordable housing need contrary to paragraph 61 of the NPPF; and
- It is inconsistent with national policy, including because it does not support economic growth contrary to paragraph 80 of the NPPF.

3.32 However, it should be recognised that Ipswich Borough Council has limited capacity to deliver housing. It may therefore be appropriate to identify a capacity constrained housing requirement for Ipswich Borough providing the resultant unmet needs are able to be addressed across the HMA. In order to do this, rather than constraining the need as proposed in the Core Strategy Review, it will be necessary to identify the unconstrained need and then identify the capacity of Ipswich Borough to meet this need and set the housing requirement at an appropriate level.

#### Stepped housing requirement

- 3.33 Policy CS7 proposes to step the housing requirement to provide for only 300 homes per annum in the period 2018-24 and then 518 homes per annum in the period 2024-36.
- 3.34 The official household projections upon which the standard method rely, indicate that the household growth is broadly consistent throughout the plan period with an average of 382 households per annum in the period 2018-24 and 383 households per annum in 2024-36. This means that the need for housing is consistent and provides no justification for adopting a stepped requirement.
- 3.35 At present, there are 2,894 households on the housing register seeking affordable housing in Ipswich. This demonstrates that there is a backlog of

housing need which should be addressed as soon as possible rather than delaying this through the use of a stepped housing requirement.

- 3.36 Furthermore, it is evident that there is significant record of under-delivery in Ipswich given that the Housing Delivery Test results show that only 46% of the number of homes required have been delivered over the previous three years. This shortfall should be addressed as soon as possible which is frustrated through the use of a stepped housing requirement (unless corresponding steps are identified in neighbouring areas to compensate).
- 3.37 The use of a stepped housing requirement also means that in the short-term newly arising housing needs will not be being met with significant adverse effects to those households who would otherwise have accessed the homes.
- 3.38 The proposed stepped requirement in Policy CS7 means that by 1<sup>st</sup> April 2024, only 1,800 homes will have been delivered in response to the identified annualised need for 2,670 homes<sup>6</sup> which as identified above does not meet the actual needs in Ipswich. This will therefore give rise to at least 870 households in need of housing for which no provision will have been made.
- 3.39 All the way through to at least 1<sup>st</sup> April 2035, there will remain households in need of housing for which no provision will have been made even against the standard method which does not provide for demographic, economic or affordable need.
- 3.40 It is acknowledged that in Ipswich Borough it may be appropriate to meet the plan period housing needs through larger strategic allocations and that this may justify the use of a stepped requirement in this LPA. However, this would require corresponding stepped requirements across the remainder of the HMA, with a higher housing requirement in the early years, to ensure that housing needs are met in a timely fashion across the HMA.
- 3.41 It does not appear that this strategic cross-boundary issue has been addressed under the duty-to-cooperate. The significant under-delivery of housing which arises from the unilateral stepped requirement proposed in Ipswich Borough is not therefore being addressed across the HMA and thereby gives rise to significant adverse effects. In the absence of such agreement, the stepped

<sup>6</sup> =445x6

housing requirement is not positively prepared, justified, or effective in meeting housing needs and it is contrary to paragraphs 7 and 23 of the NPPF.

### Contingency

- 3.42 Policy CS7 also identifies that to boost the supply of housing in Ipswich it is appropriate to incorporate a contingency of 10%. As this contingency is necessary to provide for the boost to housing supply as required by paragraph 59 of the NPPF, this should be included within the housing requirement.
- 3.43 This accords with the approach of numerous Local Plan Inspectors, who have identified that in order to secure the objectives of national policy, the necessary contingency should be included in the housing requirement, including at the Vale of Aylesbury Local Plan examination and the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy examination.
- 3.44 Without this additional 10%, the housing requirement of Policy CS7 would be ineffective in boosting supply and would be contrary to paragraph 59 of the NPPF.

### Supply

- 3.45 The necessary contingency is to be provided through a supply in excess of the minimum local housing need as identified in Table 3 of the Core Strategy Review.
- 3.46 However, the Council has not produced a trajectory which allows representors to assess whether the supply identified by the Council is deliverable and/or developable. The absence of such a trajectory is directly contrary to paragraph 73 of the NPPF.
- 3.47 It is therefore not possible to conclude upon whether there is a sufficient supply to meet the identified housing requirement over the plan period and Pegasus Group reserve the right to respond to the necessary evidence when this becomes available.
- 3.48 Similarly, the Council has not provided any evidence to demonstrate that they will be able to demonstrate a five-year housing land supply.
- 3.49 The supply relied upon by the Council is therefore unjustified in the absence of any evidence, it will not be effective in meeting housing needs and it is not consistent with national policy.

#### 4. POLICY ISPA1

- 4.1 Policy ISPA1 proposes that Ipswich Borough Council will contribute to the delivery of the minimum local housing need identified by the standard method across the HMA.
- 4.2 As set out in response to Policy CS7, given the acknowledged flaws in the projections within the standard method, this will be insufficient to meet the actual housing needs across the HMA.
- 4.3 Furthermore, as the housing needs of every LPA within the HMA are not being examined jointly, it is not possible or appropriate to identify the housing need across the HMA within the Ipswich Core Strategy Review. The component needs will be required to be considered through separate Local Plan examinations. In each of the emerging Local Plans it will be necessary for the capacity of the LPA to meet the need to be identified and for any unmet needs to be addressed across the remainder of the HMA under the duty to co-operate.
- 4.4 As the Joint Local Plan in Mid Suffolk and Babergh has yet to be subject to a Regulation 19 consultation, this will not be submitted for examination prior to March 2020. It will therefore be necessary for the minimum local housing need to be recalculated in these LPAs following the publication of the new affordability information in March 2020 to accord with the PPG (2a-008). The standard method will then generate a different figure both within Mid Suffolk and Babergh and across the HMA. The Government has also proposed to review the formulae within the standard method in October 2020. This will again change the minimum local housing need to be responded to in emerging Local Plans. As a result, the figure in ISPA1 will be out-of-date and will not accord with the minimum local housing need across the HMA. It is therefore inappropriate to include this figure within the Core Strategy Review.
- 4.5 However, the intent within Policy ISPA1 to address the as yet unknown housing needs across the HMA is to be welcomed.

## 5. CONCLUSIONS

- 5.1 As set out throughout these representations, Policy CS7 does not represent positive planning, It is not justified being contrary to the available evidence, It will not be effective in meeting demographic, economic or affordable housing needs, and It is Inconsistent with the social, economic and environmental objectives of the NPPF and specifically paragraphs 7, 23, 35a, 59, 60, 73 and 80 of the NPPF as well as numerous sections of the PPG.
- 5.2 In order to address this, It will be necessary to identify the housing need necessary to meet demographic and economic needs without increasing the need to travel as well as considering whether additional provision should be made to support affordable housing delivery and then setting a housing requirement which provides for the necessary significant boost to supply. The available evidence indicates that this is likely to result in a need for in excess of **11,500 homes in Ipswich**.
- 5.3 Having identified the housing need in accordance with the NPPF, It will then be necessary to consider whether this can be met within the Borough or whether it is appropriate to progress the Core Strategy Review with a constrained housing requirement with the remaining need to be met in neighbouring LPAs.
- 5.4 Furthermore, the justification for the proposed stepped housing requirement if supported provides no justification for not meeting housing needs in a timely fashion across the Housing Market Area. Accordingly, if the stepped housing requirement is considered appropriate it will be necessary for corresponding stepped housing requirements (with a greater number in the early years to offset the lower number in Ipswich) in neighbouring LPAs to ensure that the existing housing backlog is addressed as soon as possible and to ensure that housing delivery does not continue to lag behind need as has been the case in Ipswich as reflected in the Housing Delivery Test result.

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## APPENDIX 1

### ECONOMIC ANALYSIS OF HOUSING NEED

**A1. INTRODUCTION - IPSWICH LOCAL PLAN CONSULTATION**

A1.1 This appendix assesses housing need in Ipswich based on the economic need and conditions in Ipswich itself and with reference to the town's economic geography. That geography covers a large area beyond the town's boundaries, reflecting its role as a key regional employment centre.

A1.2 The paper assesses the economic components of housing demand and supply that are ultimately reflected in prices. These include employment and wage growth on the demand side, and housing stock growth on the supply side. Specifically, this means focussing on:

- Travel to Work Areas and commuting
- Housing and Labour Market Supply Growth
- Labour Demand (job) Growth
- Wage Growth – including changes in labour market structure
- House Prices and Inflation.

**A2. IPSWICH COMMUTING AND TRAVEL TO WORK AREA**

A2.1 A Travel to Work Area (TTWA) as defined by the Office for National Statistics is the area within which at least 75% of resident workers are employed. It is also the area within which at least 75% of those working also live. That is to say, the large majority of interactions between people's places of work and places of residence takes place within the defined area. These interactions, and the volumes of them, are the key drivers and influencers of local housing markets.

A2.2 The Ipswich Travel to Work Area, defined by the Office for National Statistics on the basis of 2011 Census commuting data, includes Ipswich and much of Babergh, Suffolk Coastal and Mid Suffolk districts. The area is shown in Figure 1 below.

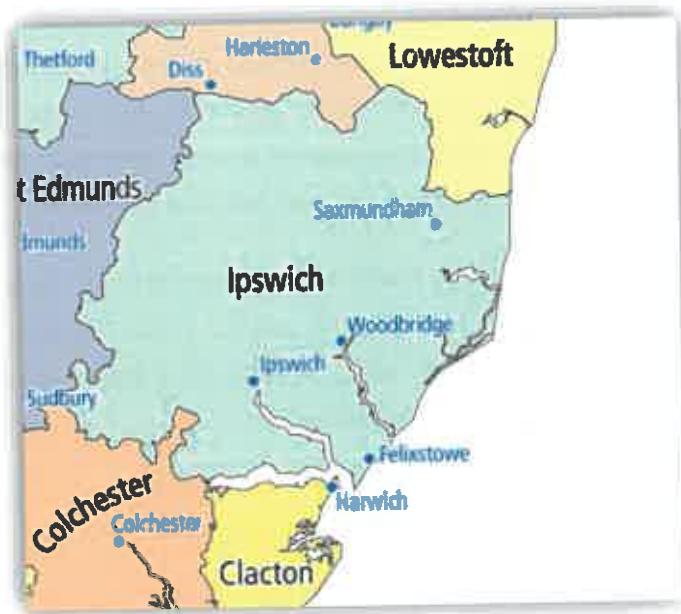


Figure 1: Ipswich Travel to Work Area. Source: ONS, 2011 Census

- A2.3 These four districts have been amalgamated for local planning purposes into the Functional Economic Market Area or FEMA, in accordance with the Strategic Housing Market Assessment, May 2017.
- A2.4 Analysis of census commuting data is vital for understanding the interdependences between housing and labour markets in the FEMA. Analysis shows that in 2011, Ipswich's neighbouring authorities (Suffolk Coastal, Babergh and Mid Suffolk) supplied over a third (34.3%) of its workforce<sup>7</sup>. This amounted to 21,145 workers and highlights the extent to which Ipswich was reliant on its neighbours for labour supply even in 2011.
- A2.5 Census data is increasingly out of date however, so it is important to note changes that have occurred since 2011. Labour markets of all districts have grown, most substantially in Ipswich by over 13%<sup>8</sup> with 10,000 jobs between 2012 and 2018.

<sup>7</sup> Ipswich Core Strategy Census Data Trends and Analysis; WSP for Ipswich Borough Council, February 2016

<sup>8</sup> ONS Total jobs, Change 2012-2017: Ipswich +10.9% Suffolk Coastal +3.3%

- A2.6 For commuting levels in Ipswich to remain similar today to those observed in 2011, an equivalent or similar growth of labour supply to that of the labour market would be needed, subject to transport mode share remaining constant.
- A2.7 In reality, as is set out later in this paper, Ipswich's labour supply has actually shrunk, meaning that the town's labour force expansion has had to be fed with imported labour. As a consequence, the level of in-commuting since 2011 will have increased substantially.
- A3. ASSESSMENT OF HISTORIC HOUSING SUPPLY**
- A3.1 There can be little doubt that a lack of housing supply growth is behind this acute labour supply shortage. Housing stock data<sup>9</sup> shows in the last 6 years that stock growth has been minimal across all the FEMAs districts, most notably in Ipswich itself where less than 275 homes a year have been built on average between 2011 and 2018. This represents a total expansion of housing stock over these 7 years of just 3.2%, the lowest of any local authority area in Suffolk and the fifth lowest of any in the East of England. In Babergh, which should be a key residential destination for Ipswich workers, the picture is little different, with stock growth of just 4.2% or 232 homes a year on average to 2018.
- A3.2 The relevance of this data in the neighbouring districts is important to note as these are areas that might otherwise provide a "release valve" to the pressure that has built in Ipswich as its economy and labour force has grown.
- A3.3 This lack of housing delivery is now also apparent in the latest results of the Government's Housing Delivery Test (HDT), released in February 2020. These show that Ipswich had the 9th lowest delivery rate in the country for the 3 years to 2019. Delivery of less than half (46%) the required level, means that the authority is now required to identify a 20% buffer when considering its five-year land supply and prepare an Action Plan to identify actions to increase housing delivery.
- A3.4 It is clear then that a startling imbalance has developed between job growth and labour supply growth in Ipswich. Not only this, but the neighbouring districts that would ordinarily take some of the development pressures arising from a rapidly growing employment centre, have provided little in the way of relief.

<sup>9</sup> Homes data from MHCLG Table LT125, Dwelling Stock Estimates.

A3.5 While the newly released HDT shows these districts have begun to respond in the last 3 years, the scale of under-delivery stretching back to the start of the current economic cycle<sup>10</sup> means that there is a considerable degree of catching up to be done in terms of housing supply.

#### A4. LABOUR MARKET IMBALANCE

A4.1 One of the results of a shortfall in housing delivery has been the lack of growth in the numbers of economically active residents in Ipswich. This cohort has completely stagnated and at times declined since 2012. ONS data show 73,000 economically active residents in 2011 and 71,900 in 2018. The picture in Suffolk Coastal, Babergh and Mid Suffolk is little different<sup>11</sup>.

A4.2 This demonstrates the extent to which the lack of local labour supply growth has meant the area's labour market expansion has had to be supported by labour imported from around the region, increasing the length of commuting journeys and of fostering unsustainable travel patterns.

A4.3 In tight labour markets where there are limited spare workers to fill new jobs, workers have to be imported from further afield. This adds pressure to the local housing market as imported workers seek to relocate and require housing in the area. As the post 2011 Census data shows (together with house price inflation of 41% in the Housing Market Area), Ipswich has generated substantial housing need as a result of its labour market growth far outstripping housing delivery growth.

A4.4 Between 2012 and 2018, Ipswich added 10,000 jobs<sup>12</sup>, representing labour market growth of over 13%. Job density meanwhile – the number of jobs relative to residents aged 16-64 – rose by 14.5% to 0.95 jobs per resident aged 16-64, indicating that Ipswich may soon become one of a comparatively few areas where the number of jobs exceeds the number of residents. This is normally the situation for large cities or smaller cities with exceptionally dense employment

<sup>10</sup> An economic cycle is the period covering a phase of both economic contraction and expansion. The current cycle began at the end of the last contraction in 2008/09 and is still active in 2020.

<sup>11</sup> ONS Annual Population Survey Data, All Economically Active People Jan-Dec 2012 to Jan-Dec 2017.

<sup>12</sup> ONS Total Jobs data, time-series, 2012-2018

clusters such as Oxford or Cambridge, with substantial labour supply provided by neighbouring areas.

- A4.5 As a comparison, South Cambridgeshire delivered 4,740 homes between 2011 and 2018, amounting to 677 homes per year and Cambridge 6,040 homes at 863 per year. This compares to the figures for Babergh and Ipswich of 232 and 273 homes per year respectively. Cambridge's labour market may have grown faster than Ipswich (22% vs 13%) but Ipswich is larger than Cambridge in population terms and its lack of housing supply response in comparison is clear.
- A4.6 It has been shown that Ipswich's labour supply and housing need is met in considerable part by its neighbouring authorities, evidenced by the TTWA data showing over a third of Ipswich workers in 2011 were residing in Babergh, Mid Suffolk and Suffolk Coastal.
- A4.7 It is possible to consider the effect on housing demand arising from this divergence between supply growth and demand (jobs and wage) growth. The graph at figure 2 shows house price growth in the blue shaded area, job growth in the red line, and dwelling stock change in the green bars.

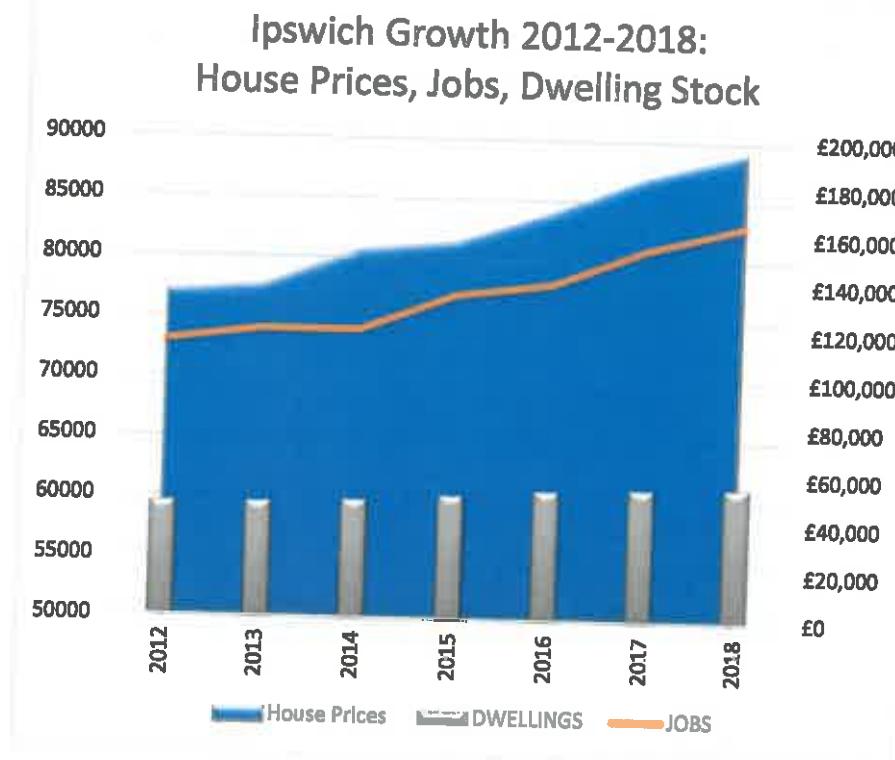


Figure 2: Ipswich Dwellings-Jobs-House Prices Change 2012-2018

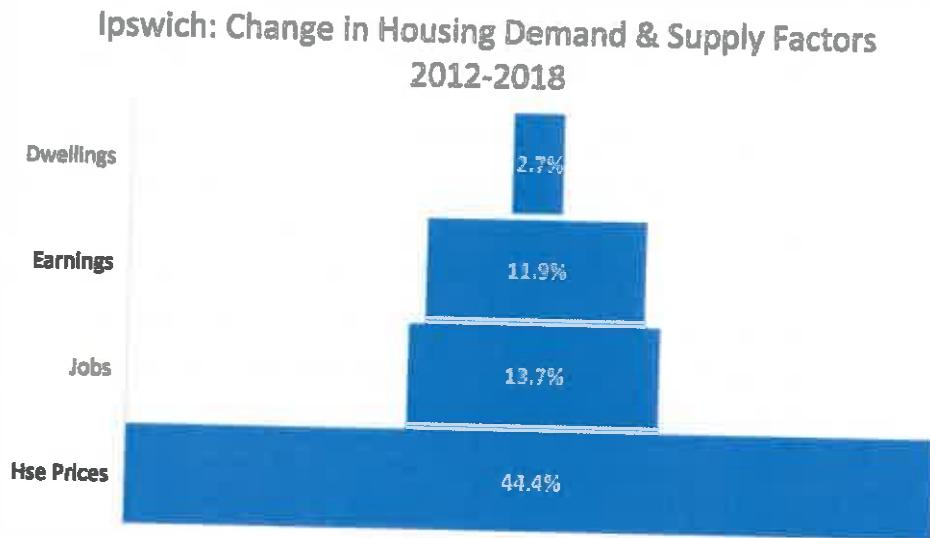
- A4.8 The graph shows how demand as represented by house prices has mirrored job growth as housing stock growth has stayed almost static by comparison.
- A4.9 Another key factor is wage growth, increasing by around 12% between 2012 and 2018. While aggregate wages have not increased to this extent nationally, it is clear that in Ipswich wage growth has been driven by a marked increase in higher value jobs in the area. The proportion of workers employed in top 3 occupational classifications reached over 50% in 2018, having been below 35% in 2012<sup>13</sup>. The effect of this is a significant increase in earning power in the local labour market due to growth in high earning positions.
- A4.10 Inevitably therefore, this growth and the structural changes in the labour market have driven house price inflation, as shown by the blue shading in the graph. This amounts to a 44% increase in prices between 2012 and 2018. Percentage growth for each demand and supply input and the result on prices is shown in Figure 3.

## A5. HOUSING SUPPLY CONCLUSIONS

- A5.1 As has been observed, Ipswich has seen growth of 10,000 jobs between 2012 and 2018<sup>14</sup> and 1,630 homes. The number of homes needed to maintain the balance of homes to jobs that existed in 2012, when house prices were over 44% lower and prior to the rapid labour market change described, can be calculated. This is done using the ratio of jobs to dwellings from 2012, which was 1.23.
- A5.2 Using this ratio, we can determine that in 2018, the number of homes needed in Ipswich to maintain the ratio to jobs in 2012 would be 67,742. The actual number of homes in 2018 stood at 61,210, a deficit of 6,672 homes. This calculation demonstrates the imbalance between housing supply and economic growth which is likely to have contributed to the increases in house prices locally.

<sup>13</sup> ONS Annual Population Survey data, ONS SOC 2010 Classifications

<sup>14</sup> ONS Total Jobs Data, Time-series



*Figure 3: Change in Housing Demand & Supply Factors: Effect on Prices*

- A5.3 In reality, ambitious business growth plans for Ipswich, Felixstowe and the wider region indicate further substantial job growth can be expected throughout the Ipswich HMA that will need to be supported with a far greater local labour supply and housing supply response than has been in evidence to date.
- A5.4 The Local Enterprise Partnership has targeted job growth of 88,000 by 2036. If we assume half of this occurred in Suffolk, 44,000 new jobs in Suffolk would represent a 12% growth in job numbers.
- A5.5 If housing growth remains as limited as has been shown in this paper, the Economic Development ambitions of the Local Enterprise Partnership will go unrealised. It is highly unlikely that the further labour supply required could be found given that all data already suggests that the limits of Labour Market Importing have been reached.
- A5.6 Accessibility and sustainability pressures are likely to have caused transport network problems which may have contributed to the need for the "Ipswich Northern Route Project" to create a new route north of Ipswich. Ongoing attempts to agree and select a route however mean this project remains some way off. Government data shows that vehicle miles travelled in Suffolk between the 2012-2018 growth period analysed in this report, increased by 16.5%<sup>15</sup>. This is equivalent to more than 600,000 additional miles travelled on the county's

<sup>15</sup> DFT Traffic Count Data for Suffolk, via <https://roadtraffic.dft.gov.uk/local-authorities/126>

roads in just five years. This further underlines the extent of the imported labour described in this report and the resulting sustainability issues that arise.

- A5.7 What is clear is that Ipswich has become a major regional growth hub for high-quality, higher earning employment, driving a growing housing need. The positive economic development story has taken place in spite of the lack of local labour supply, which has simply had to be drawn from across the region. The effect is seen in house prices, transport and sustainability pressures. To address this and to give the future growth ambitions of the LEP a chance of being achieved, a major supply response is required. A calculation to show the level of housing that would have been supplied if delivery had kept pace with economic growth since 2012, shows that Ipswich is nearly 7,000 homes "behind the curve" relative to its economic development. This is a clear demonstration of the extent of the supply response that is required in (and around) Ipswich.

**Turley Office**  
8 Quy Court  
Colliers Lane  
Stow-cum-Quy  
Cambridge  
CB25 9AU

**Turley**

## **Felicia Blake**

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**From:** Jo Porter  
**Sent:** 02 March 2020 12:29  
**To:** PlanningPolicy  
**Subject:** Final Local Plan - Draft - reposnse to consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Planning

I strongly object to the proposed site allocation for future housing development on the site shared with East Suffolk - ISPA 4.1 and IP303.

The area considered corresponds with East Suffolk SCLP 12.24 which considers a much wider area of the countryside and joins in with the proposed

SCLP12.24. Developing an area as large as this will create an urban effect in a rural area, destroy habitats, trees, hedges and crops. It will create air pollution, drainage issues (which are already to capacity). The traffic infrastructure is not capable, Tuddenham Road is a main route from villages such as Westerfield, Tuddenham, Clopton and Grundisburgh into the town of Ipswich. Humber Doucy Lane is also used as a main route and can be stacked back some distance in heavy traffic, it will not cope with such a large amount of potential traffic. The local high school is already to capacity and the local primary school cannot take on futher development already being a school of 630 primary school children. The plan suggests that this area would be an overflow for the Northern Fringe development - has there been consideration to the volume of traffic that goes along Humber Doucy Lane and Tuddenham Road. There is no safe route to cross that busy road(s). Also there is suggestion that a nursery would be built on the land that will ease the need in Witnesham. Witnesham is several miles away and this would require parents to travel in their cars to get too - meaning that there would be even more traffic.

The proposal fails to fully take adequate and comprehensive account of transport, air quality, economy and wastewater issues; specifically that the possibility that the viability of development of the 'Garden Suburb', in combination with all the other cross boundary proposals of East Coast /Waveney, may not be sustainably achieved due to the plans severe impacts on air quality, traffic and lack of sewage infrastructure.

This area attracts endangered wildlife and habitats for a variety of animals, destroying this area would be harmful and detrimental to policies set out in the existing local plan. It will destroy designated green space and also green rim space and goes against the following Suffolk Coastal District Council Core Strategy and Development Management Development Plan policies

**SP1 Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**SP1A Presumption in Favour of Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**SP16 Sport and Play (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**SP19 Settlement Policy (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**SP29 The Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**DM3 Housing in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**DM4 Housing in Clusters in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**DM23 Residential Amenity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**SP15 Landscape and Townscape**

**DM21 - Aesthetics**

**There have been many planning applications refused in this area, this site will go against SCDC own reasonings for refusing planning in the past.**

**It will have a huge detrimental impact to residents on Tuddenham Lane the extra noise in a peaceful rural countryside setting, traffic into the area, loss of natural light. I walk my children to/from school via the footpath through a nearby field, it is already extremely busy and troublesome to cross Humber Doucy Lane with further development of this area would make it near on impossible to cross the already busy speeding road.**

**IF, this plan is agreed then there MUST be consideration for drainage, safety with regards to traffic overload, cycle lanes and dual school catchment areas with a reduced amount of proposed dwellings - over 600 houses is too high and this will inevitably destroy the countryside which it will border.**

**I trust you will take my comments on board and address the above concerns.**

**J Porter**

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**R**



This submission is confirmed

[26331]

### Object Chapter 1 - Introduction

Respondent: **Ravenswood Environmental Group (Mr Robert Eburne) [2469]**

Received: 02/03/2020 via Web

The plan is poorly prepared and presented and is very difficult to read. It lacks justification and its policies are neither useful to developers or decisionmakers. It is the most poorly presented plan in the region. It needs to demonstrate cross boundary working as happens in Greater Norwich and Greater Cambridge and it needs criteria based policies so that it can be held to account by the public and used successfully by developers. It is vague and the environmental impacts are not justified.

**Changes to plan:** The plan needs to be rewritten following a proper cooperation with the public and neighbouring Councils.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** Because written representations alone are statistically highly unlikely to be effective in changing local plans

This submission is confirmed

[26332]

### Object Policy SP2 - Land Allocated for Housing

Respondent: Ravenswood Environmental Group (Mr Robert Eburne) [2469]

Received: 02/03/2020 via Web

Not justified

**Changes to plan:** Plan needs to be rewritten to justify sites with criteria based policies which deal with the mitigation of development impacts.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To represent the views of a group of residents and environmental interests

This submission is confirmed

[26333]

### Object Chapter 1 - Introduction

 Has attachments

Respondent: **Ravenswood Environmental Group (Mr Robert Eburne) [2469]**

Received: 02/03/2020 via Web

The plan has not been positively prepared and is poorly presented in an illogical way. There is no cooperation between local authorities such as has happened around Cambridge or Norwich. The plan contains disjointed lists of sites and does nothing to assist decision makers to establish what is or is not acceptable or how various constraints would be overcome.

**Changes to plan:** Rewrite the plan. Cooperate properly with the public and cross border authorities.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** to represent the views of the community

This submission is confirmed

[26334]

**Object Policy SP3 - Land with Planning Permission or Awaiting a Section 106, IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)**

**Respondent:** Ravenswood Environmental Group (Mr Robert Eburne) [2469]

**Received:** 02/03/2020 via Web

The Online consultation refers to this as being sites Sand T but these were built out prior to April 2019, The correct reference should be sites U, V, W. It is questioned whether these can be stated as having planning permission as they relate to an historic Outline Planning Permission which is no longer extant.

**Changes to plan:** The plan should contain a policy which explains what is proposed for sites U, V , W given that the sites no longer have planning consent and it would be unreasonable to rely on an old planning permission to guide what would be proposed. The site has been removed from the plan without justification.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To represent the views of a number of individuals

This submission is confirmed

[26335]

**Object Policy SP7 – Land Allocated for Leisure Uses or Community Facilities**

**Respondent:** Ravenswood Environmental Group (Mr Robert Eburne) [2469]

**Received:** 02/03/2020 via Web

The Sports Park proposal is vague and unjustified. The plan does not explain what a sports park is or how the ecological impacts of its development would be mitigated

**Changes to plan:** Delete the proposed sports park from the plan Site iP150b

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To represent the views of a group of individuals

This submission is confirmed

[26336]

**Object Policy SP5 – Land Allocated for Employment Use**

**Respondent:** Ravenswood Environmental Group (Mr Robert Eburne) [2469]

**Received:** 02/03/2020 via Web

The Ravenswood employment sites should be planned so as to mitigate traffic impacts and be masterplanned with residential development

**Changes to plan:** The whole area should be masterplanned so that environmental impacts are considered.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To represent local views

This submission is confirmed

[26337]

## Object Policy SP2 - Land Allocated for Housing

Has attachments

Respondent: Ravenswood Environmental Group (Mr Robert Eburne) [2469]

Received: 02/03/2020 via Web

The Policy is supported by site sheets in an appendix. The appendix should make it clear that the site sheets are or are not part of the plan. The plan is vague and unjustified. Site IP150 e is adjacent to other sites such as IP150c and IP150e and IP150d. These are geographically related but they are separate in the plan. There is no justification for this piecemeal approach. The plan highlights serious traffic, air-quality, ecology, amenity and heritage constraints but does nothing to resolve these and does not insist upon masterplanning and effective mitigation.

**Changes to plan:** Propose a new policy to present all of the plans for Ravenswood so that the various sites can be effectively masterplanned and environmental mitigation proposed. It is unacceptable to propose development only with a list of issues whilst not inviting or suggesting how these would be resolved.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

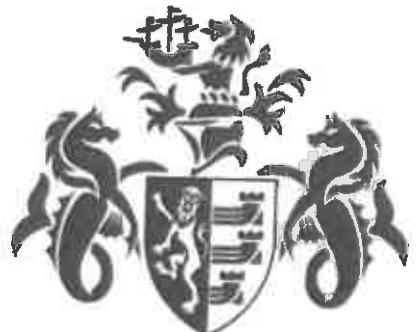
**Reason for appearance:** To represent the views of a number of individuals and to present more detailed evidence

# **Public Consultation Ipswich Local Plan Review Preferred Options**

**16<sup>th</sup> January – 13<sup>th</sup> March 2019**

**Town & Country Planning (Local Planning) (England) Regulations  
2012 (Regulation 18)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                |                                                                                                                                                             |
|----------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Planning documents to which this comments form relates:</b> | <b>Ipswich Local Plan Review Preferred Options</b>                                                                                                          |
| <b>Please return this comments form to:</b>                    | <u>planningpolicy@ipswich.gov.uk</u> or<br>Planning and Development<br>Ipswich Borough Council<br>Grafton House<br>15-17 Russell Road<br>Ipswich<br>IP1 2DE |
| <b>Return by:</b>                                              | <b>11.45pm Wednesday 13<sup>th</sup> March 2019</b>                                                                                                         |
| <b>This form has two parts:</b>                                | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                    |

#### PART A PERSONAL DETAILS

|                                            | <b>1. Personal details</b>     | <b>2. Agent's details (if applicable)</b> |
|--------------------------------------------|--------------------------------|-------------------------------------------|
| Title                                      | Mr                             |                                           |
| First name                                 | Robert                         |                                           |
| Last name                                  | Eburne                         |                                           |
| Job title (where relevant)                 |                                |                                           |
| Organisation (where relevant)              | Ravenswood Environmental Group |                                           |
| Address<br><i>Please include post code</i> |                                |                                           |
| E-mail<br>Telephone No.                    |                                |                                           |

**Signature:**

..... Date: .....12/03/2019.....

For individuals only (not applicable to organisations), we would like to add your contact details to the Local Plan Review consultation database so that we can contact you in the future regarding planning matters.  
Please put a tick in the box if you consent to us holding your details.

**PART B Comments about the Ipswich Local Plan Review Preferred Options**

Your name or organisation (and client if you are an agent):

Mr Robert Eburne (Ravenswood Environmental Group)

Please comment on any or all of the sections, chapters or sites in the Ipswich Local Plan Review Preferred Options documents and specify which sections, chapters or site(s) you are commenting upon.

| Section/Chapter or Site reference:                                         | Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Paragraph 6.8<br/>The Objectives</b>                                    | The Local Plan Documentation does not deliver upon the stated Objectives and does not comply with significant swathes of national planning policy contained in the NPPF (February 2019) and elsewhere. Notably the Local Plan Policies and their associated justification are in conflict with, chapters 3, 5, 8, 9, 12, 14, 15 and 16 of the NPPF. It is alarming that the plan already fails to meet basic requirements of plan making as initially set out in paragraph 16 of the NPPF.                                                                                                                                                                                                                                                                                                                                       |
| <b>Strategic Environmental Assessment and Sustainability Appraisal</b>     | The traffic-light scoring system used throughout the SA is inaccurate insofar as it relates to various sites within Ravenswood. The SA is also not consistent with the SHEELAA also from January 2019 which again uses a Red, Amber, Green scoring system and incorrectly scores sites which are known to have negative issues associate with them. The SA results of each of the sites pertaining to the Ravenswood locality are questioned. These sites are IP150a, IP150b, IP150c (omitted from SA), IP150d, IP150e and IP152. The SA does not assess these sites cumulatively and that is a crucial failing of policy making here. These sites cumulatively have a negative impact on the SPA and visitor pressure is already too great and associated management too poor to allow further development and population here. |
| <b>Statement of Common Ground<br/>November 2018<br/>(between Councils)</b> | The Statement of Common Ground in relation to Strategic Cross Boundary Planning Matters is weak. Given that Ipswich cannot meet its own development needs it is of some concern that a closer working arrangement has not been created. Ipswich is an important sub regional centre. The other two similar centres in the region are Norwich and Cambridge. Norwich City is planned as part of the Greater Norwich Local Plan with Broadland and South Norfolk. Cambridge is planned with South Cambridgeshire as Greater Cambridgeshire but Ipswich is not coordinating its growth on the same statutory basis. Consideration must be given to a joint Local Plan.                                                                                                                                                              |
| <b>Sites IP150a, IP150b, IP150c, IP150d, IP150e and IP152</b>              | The Ravenswood locality includes 6 proposed allocated sites, 5 of which sit directly adjacent to each other. The 6 <sup>th</sup> site is IP150a which is a residual part of the 2007 Outline Planning Permission. The total area of these 6 sites is 24 Hectares of development land being allocated in a piecemeal fashion in different parts of the Local Plan but in the same location in the ground. A minimum of 254 homes are proposed on these sites along with very large areas of Class B1, B2 and B8 development, a Sports Park, park and Ride etc. There are hints that one or other of these sites should be masterplanned but no policy mandate exists to do this. It seems that an accumulation of allocations are being put in one place without any credible                                                     |

| Section/Chapter or Site reference: | Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    | <p>consideration of how they relate one to another or of what the cumulative impact of this development would be on: traffic, residential amenity, various protected sites (including Nature Reserves and an SPA), air quality, noise, and the environment generally. Such a large centre of development needs a clear policy environment relating to access but there is nothing firm in the plan on this matter. The plan fails to satisfy the requirements of paragraph 16d of the NPPF which states that Local Plans should "<u>contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals</u>" The plan is not justified or positively prepared. It is not effective as there is no clarity as to what is expected of proposals which are put forward in such a piecemeal and haphazard way. The plan is trying to allocate a large site via "stealth", whereby an accumulation of sites are hidden away in various policy lists but, in reality, a very large urban extension is proposed without appropriate heritage, landscape, ecology and environmental mitigation or Environmental Assessment.</p> |
| IP150a<br>(SP3)                    | <p>This site is allocated by policy SP3 but it doesn't particularly fall within that category. It is debatable whether this site can be delivered on the basis of the 2007 Outline Planning Permission following the refusal of Reserved Matters Consent so long ago. Given that the Council's strategy for the site has been rejected by the Planning Inspectorate, it is essential that the Local Plan contains a criteria based policy saying in what circumstances a detailed planning permission would be granted. The Local Plan gives decision makers no direction about the site's future. The SHELAAs refers to this site as a brownfield site but it is clearly a greenfield site.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Policy CS12                        | <p>The promotion of affordable housing is welcomed but this needs to be proportionate to promote social cohesion. The NPPF states that at least 10% of the affordable housing percentage should be discounted market housing or another form of "route to home ownership". That means that where a Council is proposing 15% affordable housing then the 10% falls entirely within that 15%. Thus, policy CS12 is contrary to paragraph 64 and footnote 29 of national Planning Policy in the NPPF because by having 60% of 15% as "affordable rent" tenure then there is not enough affordable housing left to be allocated as "routes to home ownership".</p> <p>The Council as LPA is asking that "at least 15%" affordable housing should be provided on major development sites. There is no justification or explanation as to why the term "at least" is engaged here. This is a huge "developer cost" so why is there no mandatory level of affordable housing in the Local Plan as there is in all other Local Plans in the entire region?</p>                                                                                                                                     |
| Paragraph 8.113                    | <p>Where the Council wants to ... it is asking to deliver 100% affordable housing on its sites but it is not providing any clarity as to where these sites are. This approach is contrary to the government's objectives to provide mixed and balanced communities. Large scale affordable housing schemes are generally regarded as problematic in social and economic terms which is why development is normally promoted to have a</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| Section/Chapter or Site reference: | Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                    | mix of tenures and types of homes to meet the requirements of the whole community.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| IP150b<br>Policy SP7               | Site IP150b is allocated as a Sports Park but the Local Plan does not qualify or explain what this is. It is not a defined Use Class. The SA appears to suggest that this is just open green space that can sit comfortably with an adjacent Nature Reserve and nearby SPA but it may be that built development, traffic, parking, lighting, evening activities and noisy activities are involved. Plans should serve a clear purpose but none is set out in the Policy. If the plan is for predominantly open space as the SA suggests then a Sports Park should be in Policy SP6. Neighbouring residents are entitled to read the Local Plan and have certainty as to what is going to be permissible here. The site is valued as a green space and for its ecological and visual value in its current condition.                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| IP150c                             | The Land Adjacent to Nacton Road does not appear in the SA and the site sheet for site IP150e suggests that this site should be masterplanned with IP150c but there is no policy to insist upon it. There should be a criteria based policy stating how the site can be delivered as part of a masterplan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| IP150d                             | This should be described by the plan as "land south of Alnesbourn Crescent". There is no explanation or justification for this allocation which is an odd shape to be developed effectively particularly as a neighbouring development to a sports park. The plan is vague about this site. Again, if it is to be proposed then it should be part of a wider allocation with a credible justification. The site has serious nature conservation issues which would be incompatible with development. It is unclear as to how the Sports Park would be integrated with such a strange shape of development. It looks like a frontage development with a Sports Park to the rear is proposed. This would be not conducive to Designing Out Crime principles.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| IP150e<br>IP150d                   | The site here has reverted from an employment designation to housing without explanation. It is identified as being suited to 126 homes again expressed as an absolute minimum. The traffic impact of these homes is yet to be assessed and the plan is not certain about where access will be taken from. The SA says that this site is "excluding area fronting Nacton Road" and the Site Sheet Appendix says that the site should be planned comprehensively with IP152 and with "Improvements to the Nacton Road corridor" yet there is nothing to rule out piecemeal planning applications in the Local Plan. The SA states that the site is to be designed to include green infrastructure and that "existing green infrastructure of value should be preserved". The whole of site IP150e is good green infrastructure of excellent biodiversity value. The site along with IP150d and IP150b is visually and ecologically connected to the adjacent Nature Reserve. If the site is to be integrated with green infrastructure, it is quite clear that it cannot accommodate 126 homes. This represents a gross density of 35 dwellings per hectare which is higher than the net density of any nearby residential developments. If 126 is regarded as a minimum |

|                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| Section/Chapter or Site reference: | Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                                    | <p>capacity then, once infrastructure and green space is added, the net density would be up to 50 dwellings per hectare which would not be conducive to the suburban character of the remainder of the Ravenswood locality. Once again, there is vagueness in the plan about how this site is to come forward. If the site is to be allocated it must be considered comprehensively with other sites and must solve traffic and access issues by creating a new access on to Nacton Road without adding to air quality and congestion problems. The circa 1200 existing homes at Ravenswood are accessed via a single point of access and peak congestion / air quality here is already unacceptable and unsafe. <u>Without a comprehensive and cumulative assessment of the proposals on the basis of a MasterPlan which is part of Local Plan Policy, the Borough Council will be allowing piecemeal developments of conjoined sites which just exacerbate bad planning impacts on biodiversity, green space, traffic, noise and air quality.</u> A comprehensive proposal must be subject to EIA and cannot, in our view, resolve impacts including visitor pressure on the nearby SPA and Wildlife Site. These sites are referred to in the SHELAA as brownfield land. Clearly, they are green field sites.</p> |

**PART B CONTINUED**

| Section/Chapter or Site reference:    | Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IP152                                 | <p>This land is a very large area covering over 7 hectares. The plan hints that the site may allow the creation of a new access onto Nacton Road and that it might lead to improvements to the Nacton Road corridor. The detailed Site Sheet in the Appendix sets out a raft of constraints yet the site continues to be allocated for development. Alarmingly, the only guidance given to the development is that the industry should be as far from the A14 as possible meaning closer proximity to residential properties. The site has archaeological constraints along with ecology, surface water, noise and air quality issues which dictate that it should not be allocated. It is stated that issues should be resolved at the appropriate stage of the planning process. However, we are already at the appropriate stage and no work has been carried out to prove that this is a developable and accessible site without harmful impacts on the AONB, SPA and other important interests.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| IP141a                                | <p>The traffic impacts of this development must be assessed cumulatively along with the 24 hectares of development proposed at Ravenswood.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| IP149<br>Policy SP8<br>Paragraph 4.38 | <p>The Extension to the Orwell Country Park is broadly welcomed but the plan is vague about how this is to be achieved. This extension does not resolve the very poor management of the existing Country Park. Motorcycles are routinely ridden on the foreshore and dogs running free are clearly incompatible with SPA objectives. The development of the 24 Hectares of land at Ravenswood adds to visitor pressures but without any proposals to minimise habitat impacts. Paragraph 4.38 of the plan is a ridiculous contradiction because the development at Ravenswood must not have an impact on the SPA yet the proposal seeks to "provide a better network of footpaths and view points over the estuary for visitors" while also discouraging "access to the foreshore". Existing residents of Ravenswood do not want to be penalised twice over by having access to the Orwell restricted while tolerating the huge impact of disproportionate and poorly planned additional growth which should be directed to adjacent districts. The Country Park continues to be accessible by unauthorised vehicles and suffers fly tipping and vandalism. The associated and adjoining wildlife sites also suffer vandalism with new planting being uprooted in spite of the very best efforts of the Local Wildlife Group. The cause of this is proximity with residential development and the solution lies with better management and greater distance to residential development pressure rather than dumping more development on the nearest land to the SPA.</p> |

|                                           |                                                                                                                                                                                                                                                                                                                                                                                                        |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Section/Chapter or Site reference:</b> | Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)                                                                                                                                                                                                                                          |
|                                           |                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Policy DM3</b>                         | The air quality policy would prevent development at Ravenswood because existing peak hour traffic is so great that this would be an Air Quality Management Area had the Borough Council conducted appropriate monitoring at the Nacton Road roundabout. The development at Ravenswood on all of the 6 development sites adds intolerably to air quality concerns without a solution in the Local Plan. |

|                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Policy DM8</b> | The policy causes a conflict with the allocations policies because the allocations will have an adverse impact on European Protected sites. The huge housing and industrial development at Ravenswood could be located on an alternative site that would cause less harm to the SPA so Policy DM8 mandates that the Ravenswood development should be refused. The plan therefore unreasonably allocates land for development whilst including policies which would see that development rejected. |
|-------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Please ensure that Part B of your form is attached to Part A and return both to the Council's Planning Policy Team at [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk) or the postal address provided above by 11.45pm on Wednesday 13<sup>th</sup> March 2019

#### Privacy notice

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your contact details. Your comments and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address or telephone number. The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

We will hold this information for 5 years and will contact you again before this period expires to see if you wish to continue to take part in other planning consultations.

For further information about how we use your data please visit [www.ipswich.gov.uk/privacy](http://www.ipswich.gov.uk/privacy)



This submission is confirmed

[26338]

### Object Policy SP2 - Land Allocated for Housing

Respondent: Ravenswood Environmental Group (Mr Robert Eburne) [2469]

Received: 02/03/2020 via Web

Site IP150d is proposed for 34 homes but its contrived and unjustified shape demonstrates that it cannot accommodate 34 homes as frontage development. The site is of considerable ecological value and is used as Public Open Space. If it is to be developed then it should be masterplanned with other sites as part of one mixed use criteria based policy

**Changes to plan:** Delete site 150d

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To represent the views of a number of individuals

This submission is confirmed

[26339]

### Object Policy SP5 – Land Allocated for Employment Use

Respondent: Ravenswood Environmental Group (Mr Robert Eburne) [2469]

Received: 02/03/2020 via Web

The plan proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Masterplanning and EIA must be insisted upon.

**Changes to plan:** Rewrite the plan to provide a criteria based policy which only proposes development upon evidence that the impacts can be mitigated on a comprehensive basis

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To represent the views of a number of individuals

[26630]

Object Site Sheets, Site Ref: IP150c (Policy SP5) Land south of Ravenswood

Respondent: **Ravenswood Environmental Group (Mr Robert Eburne) [2469]**

Received: **02/03/2020 via Web**

The plan proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Masterplanning and EIA must be insisted upon

**Changes to plan:** Not specified

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:**

[26632]

Object Site Sheets, Site Ref: IP152 (Policy SP5 & SP9) Airport Farm Kennels, north of the A14

Respondent: [Ravenswood Environmental Group \(Mr Robert Eburne\) \[2469\]](#)

Received: **02/03/2020 via Web**

The plan proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Masterplanning and EIA must be insisted upon

**Changes to plan:** Not specified

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:**

[26636]

**Object** Site Sheets, Site Ref: IP150b (Policy SP7) Land south of Ravenswood

Respondent: [Ravenswood Environmental Group \(Mr Robert Eburne\) \[2469\]](#)

Received: 02/03/2020 via Web

The Sports Park proposal is vague and unjustified. The plan does not explain what a sports park is or how the ecological impacts of its development would be mitigated.

**Changes to plan:** Delete sports park.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:**

[26637]

**Object Chapter 4 - The Duty to Co-Operate**

[has attachments](#) Has attachments

Respondent: **Ravenswood Environmental Group (Mr Robert Eburne) [2469]**

Received: **02/03/2020 via Web**

There is no cooperation between local authorities such as has happened around Cambridge or Norwich.

**Changes to plan:** Not specified

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:**



**From:** BRYAN PATTERSON  
**Sent:** 04 February 2020 17:32  
**To:** PlanningPolicy  
**Cc:** Felicia Blake; Carlos Hone; Michael Hammond; Richard Venning  
**Subject:** Public Consultation for the Ipswich Local Plan Review Final Draft //15th Jan 2002 - 2nd March 2020  
**Attachments:** Local Plan Final Draft Comments.Jan-Mar 2020 Form CH (1).doc

Felicia HI !

**NOTE: ATTACHED RESPONSE**

Thank you for sending the required form which we have now completed and attach on behalf of the Ravenswood Residents Association.

Many thanks also to Carlos and Michael for answering some questions at the presentation at the Cliff Lane Primary School.

Best regards  
Bryan

Bryan Patterson  
Chairman  
Ravenswood Residents Association

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> |                                                                                                                                                                                                                                                                |
| <b>Please return this comments form to:</b>                          | <p><u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or</p> <p><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b></p> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                                |
| <b>This form has two parts:</b>                                      | <p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>                                                                                                                                                                                |

#### **PART A PERSONAL DETAILS**

|                                               | <b>1. Personal details</b>       | <b>2. Agent's details (if applicable)</b> |
|-----------------------------------------------|----------------------------------|-------------------------------------------|
| <b>Title</b>                                  | Mr                               |                                           |
| <b>First name</b>                             | Bryan                            |                                           |
| <b>Last name</b>                              | Patterson                        |                                           |
| <b>Job title (where relevant)</b>             | Chairman                         |                                           |
| <b>Organisation (where relevant)</b>          | Ravenswood Residents Association |                                           |
| <b>Address<br/>(Please include post code)</b> | :                                |                                           |
| <b>E-mail</b>                                 |                                  |                                           |
| <b>Telephone No.</b>                          |                                  |                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

| Your name or organisation ( <i>and client if you are an agent</i> ):                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Ravenswood Residents Association                                                                             |                                |                                                                                                              |        |                                                                                                 |        |                                                                                                 |               |                                                                                         |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|--------------------------------|--------------------------------------------------------------------------------------------------------------|--------|-------------------------------------------------------------------------------------------------|--------|-------------------------------------------------------------------------------------------------|---------------|-----------------------------------------------------------------------------------------|
| <p>Please specify which document(s) and document part you are commenting upon.</p> <p>Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.</p> <table border="1"><thead><tr><th>Document(s) and document part.</th><th>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</th></tr></thead><tbody><tr><td>IP150e</td><td>(126 houses along Alnesbourne Crescent between the restaurants and The Prince George Care Home)</td></tr><tr><td>IP150d</td><td>(34 Houses along Alnesbourne Crescent between The Blue Bird Lodge Care Home and (Dunwich Close)</td></tr><tr><td>IP 150a (UVW)</td><td>(94 Houses on UVW site from earlier plan<br/><br/>TOTAL - 254 New Houses planned in total</td></tr></tbody></table> <p><b>RECOMMENDATIONS</b></p> <ol style="list-style-type: none"><li>1) This equates to 254 houses and we would like to be kept fully informed on the plans which should fully reflect IBCs undertaking for 65.8% Private Housing and 34.2% Social Housing mix.</li><li>2) We would recommend an additional new access/egress point to Ravenswood to cope with the expected surge in traffic volumes, as we already experience heavy congestion problems at the current /2 roundabout access point – at the following times:<ul style="list-style-type: none"><li>- morning and evening rush hours</li><li>- school drop-off and pick-up times</li><li>- lunch times – restaurant traffic particularly the McDonalds queue which blocks the roundabouts and prevents traffic going to and emerging from the busy shopping mall, but also <b>IMPORTANTLY</b> any <b>EMERGENCY VEHICLES/Ambulances etc.</b>, entering or exiting the adjacent Hening Avenue and heading to or coming from the Ravenswood Medical Practice.</li></ul></li></ol> |                                                                                                              | Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) | IP150e | (126 houses along Alnesbourne Crescent between the restaurants and The Prince George Care Home) | IP150d | (34 Houses along Alnesbourne Crescent between The Blue Bird Lodge Care Home and (Dunwich Close) | IP 150a (UVW) | (94 Houses on UVW site from earlier plan<br><br>TOTAL - 254 New Houses planned in total |
| Document(s) and document part.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |                                |                                                                                                              |        |                                                                                                 |        |                                                                                                 |               |                                                                                         |
| IP150e                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | (126 houses along Alnesbourne Crescent between the restaurants and The Prince George Care Home)              |                                |                                                                                                              |        |                                                                                                 |        |                                                                                                 |               |                                                                                         |
| IP150d                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | (34 Houses along Alnesbourne Crescent between The Blue Bird Lodge Care Home and (Dunwich Close)              |                                |                                                                                                              |        |                                                                                                 |        |                                                                                                 |               |                                                                                         |
| IP 150a (UVW)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | (94 Houses on UVW site from earlier plan<br><br>TOTAL - 254 New Houses planned in total                      |                                |                                                                                                              |        |                                                                                                 |        |                                                                                                 |               |                                                                                         |

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|                                | <p><b>FURTHER COMMENTS to the first Consultation – 16 Jan – 13 Mar 2019</b></p> <p>Further to the recent Local Plan Presentation, we need to clarify some further issues with you:</p> <p><b>1) when the phrase - "no significant adverse effect on the local highway network" is used does the "highway network" Just refer to the Nacton Rd and the Thrasher roundabout etc or does it cover ALL local roads Including those on Ravenswood?</b></p> <p><b>2) Mr Carlos Hone's view seemed to be that any second access road could serve the new development ONLY. We believe that it should be designed to relieve the pressure for the whole of Ravenswood Including all of the additional 254 houses - 126 + 34 on Alnesbourne Crescent plus the 94 on the UVW plot at the back of the school. If the road only served area IP150e + IP150d and possibly any development on IP150c then it would not help address the central access problem.</b></p> <p><b>3) The upgrading of the private road to the golf course as you come off the A14 and heading to the Thrasher roundabout, is we believe the only possibility for the second point of access/egress into Ravenswood. The link then into our Ravenswood estate perhaps needs to be before the Blue Bird Lodge care home through IP150e, or after the Bluebird Lodge, and the new developments in IP150d and IP150b - which might need a trifle reconfiguration.</b></p> <p><b>4) We have gridlock now at several points during a normal working day with our one access point, but to cope with the new cars from 254 new houses, plus all of the preparatory work of builders lorries, bulldozers, and other construction machinery - something needs to planned in advance.</b></p> <p><b>5) There is also the question of additional pupils coming from the expanded estate - who would attend the Primary School - has this been factored in?</b></p> |

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| IP150c                         | <p><b>IP150c - Is the Access to this B1 site for offices etc. to be via the new IP150e 126 housing development ? This would need to be master planned.</b></p>                                                                                                                                                                                                                                                                                                                                                                                                        |
| IP152                          | <p><b>IP152 – This is designated for</b></p> <ul style="list-style-type: none"> <li>- <b>B1 (offices, R &amp; D, light industrial)</b></li> <li>- <b>B2 (general Industrial)</b></li> <li>- <b>B8 (storage/distribution)</b></li> <li>- <b>And as a SECONDARY USE</b></li> <li>- <b>Feasibility of a small section for Park &amp; Ride</b></li> </ul> <p><b>It is recognised that this development currently poses ACCESS constraints – which would also need to be master planned comprehensively with the aforementioned IP150e and IP150c mentioned above.</b></p> |
| IP150b                         | <p><b>IP150b SPORTS PARK - ACCESS to this Sports Park site will also need to be specified, as presumably access from Allesbourne Crescent would need to be made, it would appear, through the proposed new housing development on IP150d.</b></p>                                                                                                                                                                                                                                                                                                                     |
| IP152, IP150e, IP150c          | <p><b>IP152, IP150e, IP150c These 3 phases need to be coordinated and Master Planned with a second ACCESS/EGRESS point for Ravenswood, as with the existing single point of access into and out of Ravenswood already not coping at the specified times of day, then forward planning becomes an absolute must, otherwise grid-lock will come into play very rapidly.</b></p>                                                                                                                                                                                         |
|                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

| <b>Document(s) and document part.</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
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## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
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|                                      |                                                                                                                     |

**Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.**

### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

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**Adoption of the Ipswich Local Plan Review.**

### **PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.



Tetlow King  
PLANNING

Unit 2 Eclipse Office Park High Street Staple Hill Bristol BS16 5EL

T: 0117 958 1916

E:

W: [www.tetlow-king.co.uk](http://www.tetlow-king.co.uk)

Planning Policy  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
IPSWICH  
IP1 2DE

Date: 2 March 2020

Our Ref: JR M15/0715-321

By email only:  
[PlanningPolicy@ipswich.gov.uk](mailto:PlanningPolicy@ipswich.gov.uk)

Dear Sir/Madam

**RE: IPSWICH LOCAL PLAN REVIEW: REGULATION 19 FINAL DRAFT**

Thank you for the opportunity to comment on the Regulation 19 Final Draft of the Ipswich Local Plan. We represent Rentplus UK Ltd, an innovative company providing affordable rent-to-buy housing for hard-working people aspiring to home ownership. Rentplus provides an accessible route to achieve their dream through the rent - save - own model. Households rent the property for a defined period at an affordable rent and then receive a gifted 10% deposit upon purchase. Rentplus has recently been recognised by the National Housing Awards as the Most Innovative Home Ownership Solution for 2019.

Rentplus has previously commented on the Local Plan at the Regulation 18 Preferred Options stage. Our previous representations set out the Rentplus model of affordable rent to buy in full. However, by way of summary, Rentplus is an affordable Rent to Buy product which can be delivered without requiring any public subsidy. Households rent the property from Rentplus' partner Registered Providers (RP) for a defined period of five, ten, fifteen or twenty years. During this time, households will benefit from security of tenure; management and maintenance from the partner RP; the ability to establish a good credit history (to assist with mortgage applications); and the opportunity to raise their own savings. At the end of the period of rent, households will have the option to purchase; Rentplus is unique in that they receive a gifted deposit equivalent to 10% of the market value of the property at that time.

**Comments on the Regulation 19 consultation**

Firstly, as a general observation, we are pleased to see that the Council has produced a 'Tracked Change' version of the Local Plan; this is very useful to participants in the consultation.

We are pleased to see that, as was previously set out at the Preferred Options stage, policies CS8 and CS12 and their supporting text refer to the up-to-date definitions of affordable housing, as set out in Annex 2 of the Framework. This ensures the Plan is consistent with national policy and is therefore sound in this regard.

We also welcome the amendments to policy CS8 'Housing Type and Tenure' which promote a more flexible approach to mix where evidenced by the SHMA and other evidence of local needs. These amendments will assist in delivering the widest mix of housing and therefore meeting the widest range of needs. However, for clarity and for consistency with the new fourth paragraph of policy CS8, the policy CS8 should be reworded slightly as follows: "*In considering the most appropriate mix of homes by size, and type and tenure for major residential proposals...*"

It remains the case that the SHMA 2019 does not refer to the full range of tenures set out in Annex 2 and we therefore continue to recommend that a focused update to the SHMA is prepared in order to inform policy and planning decisions. Any update to the SHMA should assess needs for products such as affordable rent to buy. In order to ensure the Plan is effective, the supporting text to policy CS12 should contain a new paragraph after paragraph 8.153 which commits to keep the SHMA up to date; this would also help in the application of policy CS8. A potential form of words is set out below:

*"In order to inform negotiation and decision taking and best meet the affordable housing needs of the Borough, the Council shall keep the Strategic Housing Market Assessment regularly updated. Any updates to the SHMA will contain up-to-date assessments of need for the full range of affordable housing tenures as defined in the National Planning Policy Framework. The Council will also consider other evidence of local needs where supported by the Council."*

#### **Summary**

We trust the above comments are of assistance to the Council. Should the Council wish to discuss how affordable housing delivery and rent-to-buy can best meet local needs in Ipswich Borough, please get in touch. We would like to be notified of further consultations; please notify Tetlow King Planning as agents of Rentplus by email only to [consultation@tetlow-king.co.uk](mailto:consultation@tetlow-king.co.uk).

Yours faithfully

**JAMIE ROBERTS MPlan MRTP**  
**PRINCIPAL PLANNER**  
For and On Behalf Of  
TETLOW KING PLANNING

[consultation@tetlow-king.co.uk](mailto:consultation@tetlow-king.co.uk)

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:

[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:

[www.ipswich.gov.uk](http://www.ipswich.gov.uk)



|                                                                      |                                                                                                                                                                                                         |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>Local Plan Review</b>                                                                                                                                                                                |
| <b>Please return this comments form to:</b>                          | <b><u>planningpolicy@ipswich.gov.uk</u> or</b><br><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                         |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><b>Part B – Your comment(s).</b>                                                                                                                                    |

#### **PART A PERSONAL DETAILS**

|                                               | <b>1. Personal details</b> | <b>2. Agent's details (if applicable)</b>                                                   |
|-----------------------------------------------|----------------------------|---------------------------------------------------------------------------------------------|
| <b>Title</b>                                  | -                          | <b>Mr</b>                                                                                   |
| <b>First name</b>                             | -                          | <b>Jamie</b>                                                                                |
| <b>Last name</b>                              | -                          | <b>Roberts</b>                                                                              |
| <b>Job title (<i>where relevant</i>)</b>      | -                          | <b>Principal Planner</b>                                                                    |
| <b>Organisation (<i>where relevant</i>)</b>   | Rentplus UK Ltd            | <b>Tetlow King Planning</b>                                                                 |
| <b>Address<br/>(Please include post code)</b> | c/o Agent                  | <b>Unit 2, Eclipse Office Park<br/>High Street<br/>Staple Hill<br/>BRISTOL<br/>BS16 5EL</b> |
| <b>E-mail</b>                                 | -                          |                                                                                             |
| <b>Telephone No.</b>                          | -                          |                                                                                             |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

| Your name or organisation ( <i>and client if you are an agent</i> ):                                                                                                                                                                            | Tetlow King Planning on behalf of Rentplus UK Ltd                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
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| Policies CS8 and CS12                                                                                                                                                                                                                           | We are pleased to see that, as was previously set out at the Preferred Options stage, policies CS8 and CS12 and their supporting text refer to the up-to-date definitions of affordable housing, as set out in Annex 2 of the Framework. This ensures the Plan is consistent with national policy and is therefore sound in this regard.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Policy CS8                                                                                                                                                                                                                                      | We also welcome the amendments to policy CS8 'Housing Type and Tenure' which promote a more flexible approach to mix where evidenced by the SHMA and other evidence of local needs. These amendments will assist in delivering the widest mix of housing and therefore meeting the widest range of needs. However, for clarity and for consistency with the new fourth paragraph of policy CS8, the policy CS8 should be reworded slightly as follows: " <i>In considering the most appropriate mix of homes by size, and type and tenure for major residential proposals...</i> "                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Paragraph 8.153                                                                                                                                                                                                                                 | <p>It remains the case that the SHMA 2019 does not refer to the full range of tenures set out in Annex 2 and we therefore continue to recommend that a focused update to the SHMA is prepared in order to inform policy and planning decisions. Any update to the SHMA should assess needs for products such as affordable rent to buy. In order to ensure the Plan is effective, the supporting text to policy CS12 should contain a new paragraph after paragraph 8.153 which commits to keep the SHMA up to date; this would also help in the application of policy CS8. A potential form of words is set out below:</p> <p style="padding-left: 40px;"><i>"In order to inform negotiation and decision taking and best meet the affordable housing needs of the Borough, the Council shall keep the Strategic Housing Market Assessment regularly updated. Any updates to the SHMA will contain up-to-date assessments of need for the full range of affordable housing tenures as defined in the National Planning Policy Framework. The Council will also consider other evidence of local needs where supported by the Council."</i></p> |

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## **Felicia Blake**

---

**From:** Jacky Robson  
**Sent:** 10 February 2020 16:35  
**To:** PlanningPolicy  
**Subject:** Ravenswood developments

Dear Sir or Madam

I would like to express my concern about the proposal to build over 120 more houses next to Alnesbourn Crescent in Ravenswood, on a site which was previously not designated as being for residential development.

My main concern is that this, in conjunction with the proposal to build houses next to the primary school in Downham Boulevard, will put intolerable pressure on the vehicular access in and out of Ravenswood. This is particularly aggravated by the amount of queuing traffic generated by Macdonalds drive through restaurant, situated near the only entrance/exit.

I am currently resident in Ravenswood and, apart from the traffic problems, the area seems to have been well-designed with good cycle paths, bus routes etc. I do hope that you will re-consider this decision, and look carefully at the idea of incorporating another entrance/exit to Ravenswood.

Yours faithfully

J E Robson

Sent from Mail for Windows 10

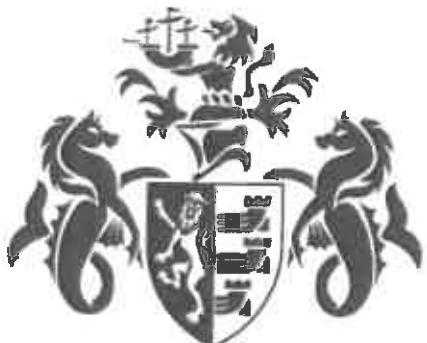
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## **Consultation Comments Form**



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BOROUGH COUNCIL**

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Planning Policy Team  
Planning and Development  
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Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>Core Strategy and Policies Development Plan Document Review Final Draft</b>                                                                                                                                                                          |
| <b>Please return this comments form to:</b>                          | <u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or<br><br><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b> |
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#### PART A PERSONAL DETAILS

|                                        | <b>1. Personal details</b>                                                        | <b>2. Agent's details (if applicable)</b> |
|----------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------|
| Title                                  | Mr                                                                                |                                           |
| First name                             | Jamie                                                                             |                                           |
| Last name                              | Murphy                                                                            |                                           |
| Job title ( <i>where relevant</i> )    | Conservation Officer                                                              |                                           |
| Organisation ( <i>where relevant</i> ) | RSPB                                                                              |                                           |
| Address<br>(Please include post code)  | RSPB Minsmere<br>Sheepwash Lane<br>Westleton<br>Saxmundham<br>Suffolk<br>IP17 3BY |                                           |
| E-mail                                 |                                                                                   |                                           |
| Telephone No.                          |                                                                                   |                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                    |
|----------------------------------------------------------------------|--------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Jamie Murphy, RSPB |
|----------------------------------------------------------------------|--------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.                                                 | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Core Strategy and Policies Development Plan Document Review Final Draft</b> | <p>During the prior consultation on Ipswich Local Plan Review Preferred Options, the RSPB responded with comments on various policies and is very pleased to see that the majority of these have been taken into consideration. It also commends the explicit reference to take action to conserve and enhance swift populations in the Natural Environment Policy (DM8), Design and Character Policy (DM12) and Supplementary Planning Documents.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>DM15 – Tall Buildings</b>                                                   | <p>There is however one notable omission from the Core Policies and Strategies Development Plan in relation to DM15 – Tall Buildings. A representation (24740) was made by the RSPB at the Issues and Options stage to include a further line in the policy, 'k) to incorporate integrated swift-bricks.' It is evident that this suggestion has not been taken forward and is seen as a missed opportunity.</p> <p>Such is the plight of swifts nationally (note that their breeding population has declined by 57% between 1995 and 2016 and they are consequently an Amber-listed species of conservation concern<sup>1</sup>), it is felt that failing to incorporate this basic measure could constitute a failure in the Borough Council's 'Duty to conserve biodiversity' under Section 40 of the Natural Environment and Rural Communities Act 2006, whereby a public authority 'must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity... which includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.'</p> <p>Given that the cost of incorporating swift bricks in buildings is insignificant (c£20 per brick) and that the attitude of housing occupants towards them is very positive<sup>2</sup>, it does not seem that inclusion would affect the Borough Council's ability to exercise its functions and indeed would be consistent with the County Council's Suffolk Nature Strategy which states "swifts need suitable spaces in buildings to nest."</p> <p>Furthermore, this kind of inclusion is not unprecedented. The Hackney proposed submission local plan (Policy LP47D) asks that "all development proposals with an eaves height of 7 metres and above are required to provide</p> |

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                | <p>nesting boxes for swifts..."<sup>3</sup>.</p> <p>With this context in mind, the RSPB hope that Ipswich Borough Council will consider including this provision in its Local Plan to ensure the precedent is set for conserving biodiversity in its development management policies and demonstrate its continued commitment to swift conservation.</p> <p><sup>1</sup> <a href="https://www.bto.org/sites/default/files/shared_documents/publications/birds-conservation-concern/birds-of-conservation-concern-4-leaflet.pdf">https://www.bto.org/sites/default/files/shared_documents/publications/birds-conservation-concern/birds-of-conservation-concern-4-leaflet.pdf</a></p> <p><sup>2</sup> <a href="https://actionforswifts.blogspot.com/2018/06/the-attitudes-of-housing-occupants-to.html">https://actionforswifts.blogspot.com/2018/06/the-attitudes-of-housing-occupants-to.html</a></p> <p><sup>3</sup> <a href="https://hackney.gov.uk/lp33">https://hackney.gov.uk/lp33</a></p> |
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**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s)<br/>and document<br/>part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|                                              |                                                                                                                     |
|                                              |                                                                                                                     |
|                                              |                                                                                                                     |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

**PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

This submission is **confirmed**

[\[26232\]](#)

Object Site Sheets, Site Ref: ISPA 4.1 (Policy SP2 & ISPA4) Northern End of Humber Doucy Lane

Respondent: [Rushmere St Andrew Parish Council \(Sylvia Stannard, Parish Clerk\) \[2422\]](#)

Received: **24/02/2020 via Web**

Rushmere St Andrew Parish Council objects to the inclusion of land at the northern end of Humber Doucy Lane adjacent to Tuddenham Road. This allocation will significantly increase traffic on the Woodbridge to Claydon corridor via Playford Road, Rushmere Street and Humber Doucy Lane. This development should not take place until significant improvements to roads and travel has been made.

**Changes to plan:** Delete the policy

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Written Representation

This submission is **confirmed**

[26233]

### Object Policy ISPA4 Cross Boundary Working to Deliver Sites

Respondent: **Rushmere St Andrew Parish Council (Sylvia Stannard, Parish Clerk) [2422]**

Received: **24/02/2020 via Web**

Rushmere St Andrew Parish Council objects to the inclusion of Policy ISPA 4.1. This allocation will significantly increase traffic on the Woodbridge to Claydon corridor via Playford Road, Rushmere Street and Humber Doucy Lane. This development should not take place until significant improvements to roads and travel has been made. The Cross Working Policy refers to upgrading of road junctions but this does not address the concerns of the parish. More should be done to improve local roads and travel and it should be specified that improvements should be implemented prior to development.

**Changes to plan:** Delete Policy ISPA 4.1 and this policy.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Written Representation

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**S**





# Save Our Country Spaces SOCS - Comments on the Ipswich Borough Council CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW- FINAL DRAFT January 2020 - Consultation Ending 2<sup>nd</sup> March 2020

The following issues need to be fully assessed & adequately addressed in order for the core strategy review to be 'sound'. SOCS suggest the plan is unsound and does not comply with the national planning policy framework (NPPF). **SOCS wish to give oral evidence at inquiry.**

The "Climate Change" agenda is insufficiently addressed. Proposals are **contrary to;**  
**NPPF 10. Meeting the challenge of climate change, flooding and coastal change.**

It appears that environmental, social and economic effects of the plan(s) are inadequately and inaccurately assessed against Habitats Regulations Assessments and the Sustainability Appraisals (SAs)

"Serious adverse effects" have not been properly identified, as required under compliance with the NPPF (**Achieving Sustainable Development NPPF 6-17**) for either the CS or development and control purposes. This situation is likely to render any planning application almost impossible to determine properly and therefore, we say, render the major IGS planning applications problematic. It also potentially renders stakeholder responses to planning applications a problem.

**NPPF-11 Conserving and enhancing the natural environment** is not adequately taken into account.

## TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS

The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion.

## THE FOLLOWING SPECIFIC ISSUES NEED TO BE FULLY ASSESSED & ADEQUATELY ADDRESSED IN ORDER FOR THE CORE STRATEGY REVIEW TO BE 'SOUND'.

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health.

The potential to secure a "sustainable future" for the existing local population, future populations and future generations is an imperative not demonstrated by the plan(s).

- |                                                                                                      |
|------------------------------------------------------------------------------------------------------|
| 1. <b>DRAINAGE</b> , Surface Water Drainage ; APPEARS NON-COMPLIANT and may not work.                |
| 2. <b>FLOODING LIKELIHOOD</b> may increase at Westerfield.                                           |
| 3. <b>SEWAGE PROPOSALS INADEQUATE</b> & likely to add to existing problems                           |
| 4. <b>TRAFFIC PROPOSALS AND ADVERSE IMPACTS ON EXISTING RESIDENTS-</b> no solutions                  |
| 5. <b>AIR POLLUTION</b> and impact on our children's health inadequate Air Pollution Action Planning |
| 6. <b>ADVERSE PRESSURES ON HOSPITALS, SCHOOLS &amp; ACCESS TO GPs and SOCIAL CARE</b>                |
| 7. <b>ADVERSE EFFECTS OF ROAD WIDENING</b> and <b>REMOVAL OF TREES &amp; VERGES</b>                  |
| 8. <b>LOSS OF HIGH GRADE LOCAL FOOD GROWING LAND</b>                                                 |
| 9. <b>REMOVAL OF TREES, HEDGEROWS, HABITATS</b>                                                      |
| 10. <b>COUNTRY PARK – DELIVERY</b> May be delayed or stalled.                                        |
| 11. <b>Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS</b>   |

SOCS have liaised with North Fringe Protection Group (NFPG) who have kindly allowed us to incorporate most of their draft text with a few minor amendments which reflect SOCS differing views, mainly on the need for a major Northern Road Route for Ipswich.

SOCS have actively supported the Stop! Campaign and will be involved in the new Start! campaign to secure safely, more environmentally friendly sustainable transport solutions and Keep Ipswich Moving.

NPPG state, 'Please find our representation on the above, which should be considered in conjunction with our representations on the associated revised Site Allocations & Policies. We want to see a sound evidence-based Core Strategy (CS) in place which will help make Ipswich a more attractive place to live and work. We have made our comments on the CS (which we also reference as the Plan) sequentially although these will relate to the same issue in different sections of the CS. Rather than keep repeating our comments, IBC should assume that our comments on each issue apply throughout the CS to that issue, wherever the issue is mentioned in the CS.'

Since SOCS have been involved with the Local Plan for Ipswich, they have baulked at the unrealistic and unjustified housing and job targets set. They have challenged population projections which have driven this agenda. It is good to see at last that the legacy of growth, expansion, over ambition and wishful thinking of the early 2000's finally are being challenged. However, there is a way to go to achieve a sound plan.

The Duty to Cooperate is hard for Ipswich to achieve when partner organisations are reluctant to take ownership and responsibility for the adverse impacts they are imposing on the County Town. Ipswich Borough has many responsibilities but little power and control and limited capacity for resolution.

### **Summary of key issues**

SOCS concerns with the IBC CS are in relation to 10 of the 12 strategic objectives and we question the legality, Sustainability and Soundness of this review plan.

Highly material is the decision and judgment released this week from The Supreme Court on Climate Change and development- (Heathrow)<sup>1</sup>. This needs referencing and being taken into account within Local Plans as it is a fundamental game changer with respect to Local Plans, Strategic Planning and Local Development Control and Planning Committee decision making.

**This new case law could make Local Plans, where Paris Agreement on climate change, (concluded in December 2015 and ratified by the United Kingdom in November 2016) isn't adequately taken into account or doesn't demonstrate conformity to within Strategic Environmental Assessment and the Habitat's Directorate requirements, challengeable and potentially unlawful.**

Extracts from the Judgment:

#### **R (FRIENDS OF THE EARTH) v SECRETARY OF STATE FOR TRANSPORT AND OTHERS 27th February 2020 Lord Justice Lindblom, Lord Justice Singh and Lord Justice Haddon-Cave SUMMARY OF JUDGMENTS**

8. To a substantial extent, for the reasons we have set out, we agree with the analysis and conclusions of the Divisional Court. Like the Divisional Court, we have concluded that the challenges to the ANPS must fail on the issues relating to the operation of the Habitats Directive, and also on all but one of the issues concerning the operation of the Strategic Environmental Assessment Directive (paragraph 283).

9. However, we have concluded that the challenges should succeed in one important respect. This relates to the legislative provisions concerning the Government's policy and commitments on climate change, in particular the provision in section 5(8) of the Planning Act, which requires that the reasons for the policy set out in the ANPS "must ... include an explanation of how the policy set out in the statement takes account of Government policy relating to the mitigation of, and adaptation to, climate change". We have concluded, in particular, that the designation of the ANPS was unlawful by reason of a failure to take into account the Government's commitment to the provisions of the Paris Agreement on climate change, concluded in December 2015 and ratified by the United Kingdom in November 2016 (paragraphs 222 to 238 and 242 to 261).

1 <https://www.judiciary.uk/wp-content/uploads/2020/02/Heathrow-summary-of-judgments-26-February-2020-online-version.pdf>

10. We have concluded that the ANPS was not produced as the law requires, and indeed as Parliament has expressly provided. The statutory regime for the formulation of a national policy statement, which Parliament put in place in the Planning Act, was not fully complied with. The Paris Agreement ought to have been taken into account by the Secretary of State in the preparation of the ANPS and an explanation given as to how it was taken into account, but it was not (paragraph 283).

11. That, in our view, is legally fatal to the ANPS in its present form.

SOCS understand the purpose of this review is to update the Core Strategy until 2036 taking into account all new legislation and National Planning Policy Framework Updates and to align the Local Plan with East Suffolk and Mid Suffolk Babergh.

However, it should be noted that East Suffolk is tasked with making modifications to their plan which was under inspection last year.<sup>2</sup>

SOCS were very critical of the 'Statement of Common Ground' issued last year and submitted a response to the emerging Mid Suffolk Local Plan Consultation in addition to one for Suffolk Coastal District Council. SOCS attended and gave oral evidence to the East Suffolk Plan Inquiry in public.<sup>3</sup> Save Out Country Spaces feel the Duty to Cooperate has not been has not been effectively achieved within this Draft; nor has it by the partner local authorities.

SOCS believe there is a lack of realistic accounting for the adopted policy on Climate Emergency and the Climate Change agenda, for 10 of the 12 strategic objectives, outlined within the CS, mainly in relation to the following; traffic related issues, including delivering the required infrastructure and modal shift and the associated impact on air quality; climate emergency and climate change precipitated flood risk, loss of grade 2 farm land, loss of vital green rim and urban/rural separation with its attendant adverse impacts on the network of wildlife links with green corridors, especially to the County Wildlife site area of the Fynn Valley.

The Tuddenham Road/Westerfield green corridors with attendant links to a network of green intersecting routes and the green rim are home to a significant number of recorded protected species. (Suffolk Biological Recording office.) We have evidence of great crested newts, badgers, hedgehogs bats and all manner of species -hares which are under threat as well as birds, flora and fauna; Southern Marsh and bee orchids are found on the Fynn Valley and adjacent area.

Due to much of the land being in private farming ownership, there has been little interest or appetite for any formal survey and recording to be done of this important area, as it does not best serve the landowners aspirations for the land use and development for housing e.t.c.

Suffolk Wildlife Trust have done some work within Red House Ipswich (desk top survey), the Fynn Valley County Wildlife Site in East Suffolk; a Hedgerow Survey of the whole IGS area done to Suffolk Hedgerow Survey methodology was completed by Dr Douglas Seaton<sup>4</sup> with direction from Guy Acres. Active badger sets have recently been reported to the County Recorder as well.

Regarding the CS proposal to incorporate sites along Humber Doucy Lane as an 'extension' of the IGS sites, the following statements by SOCS and quotes by elected member and portfolio holder Carol Jones, needs to be remembered and applied to THE DISTRIBUTION OF DEVELOPMENT - Ipswich Garden Suburb, the Northern End of Humber Doucy Lane.

2 [https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk\\_Coastal\\_Local\\_Plan\\_Post\\_hearings\\_letter.pdf](https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk_Coastal_Local_Plan_Post_hearings_letter.pdf) <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

3 a) Hearing Day 1: Tuesday 20 August (Week 1) Morning – 09:30 b) Sustainability appraisal c) Habitats Regulations Assessment f) Climate Change

4 Dr Douglas Seaton

*"Adverse impacts and significant disruption will undoubtedly occur in both the short and long term on existing residents' Quality of Life and Well being"; a point conceded by the Portfolio holder within Executive paper E/13/601;*

*" 2.2 The development of the Northern Fringe involves major challenges due to its large-scale, multiple ownership, the need to incorporate a wide range of supporting infrastructure and the mitigation of impacts on local communities."*

**SOCS believe therefore policy ISPA4 Cross Boundary Working to Deliver Sites is unjustified and unsound.**

SOCS outlined concerns about sustainability and flood risk in the last Local Plan consultation with respect of proposals for the distribution of development,

*'Red House has the highest potential for flooding; a ground level water table which hydrological assessment might suggest renders the site unviable if the mitigation required for flooding and biological site features, TPOs, hedges and ditches as unviable and proposals as they stand, cannot be either practically or economically achievable.'*

Mapping of the known flood risk (2013) in THE DISTRIBUTION OF DEVELOPMENT - Ipswich Garden Suburb, the Northern End of Humber Doucy Lane.



<https://democracy.ipswich.gov.uk/documents/s20700/Item%2002.pdf>  
An outline planning application Land off Tuddenham Road

*5.108 As the construction phase progresses the surface water runoff rates and volumes are considered to increase as more impermeable surfaces are created and vegetation removed. A surface water drainage system including sub-surface sewers, porous paving, swales, basins, ponds and wetland will serve the development and be operational for its lifetime.*

*5.109 The impact on surface water flood risk would be low, increasing to high as construction begins. Without mitigation water quality impact is considered to be medium increasing to high as construction progresses. Mitigation would be achieved through the phasing of the SuDS and the use of a CEMP to minimise the pollutants created.*



Land off Tuddenham Road by Humpback Bridge overlooking IGS displaying serious Ground Water flooding<sup>5</sup> February 2020 as outlined in Revised Suffolk Flood Risk Management Strategy Appendix 1.

The proposed extension of the IGS to the Humber Doucy Lane area would be subject to the same constraints. The ecological network, green corridor and green trail approach to strategic green infrastructure (policy CS16) we regard as unsound.

Further concerns include the lack of funding to deliver the required improvements to air quality, flood risk vulnerability and biodiversity and habitat loss.

With regard to the IGS, (and policy area ISPA4 possibly) future households will have to bear the costs of management and maintenance; maintenance charges/levy will apply to all new houses in the northern fringe. new residents to pay, in perpetuity, for drainage systems upkeep and other infrastructure ongoing costs.

This draft of the CS lacks clarity in respect of flooding risk.

In March 2016, SCC Portfolio holder Matthew Hicks confessed,

*"I recognise that, in the past, the different organisations involved have not always worked together effectively enough in managing flooding. It is vital that we all work better not just with each other but crucially with the public."*

Ipswich no longer have their own dedicated drainage engineering department which places them at a disadvantage to fight their corner.

In regard to sustainability, there should be a reference to the work of the **Food and Farming Commission<sup>6</sup>** and to the issue of sustainable land use.

5 [https://democracy.westsuffolk.gov.uk/documents/s14075/CAB.SE.16.021 Revised Suffolk Flood Risk Management Strategy Appendix 1.pdf](https://democracy.westsuffolk.gov.uk/documents/s14075/CAB.SE.16.021%20Revised%20Suffolk%20Flood%20Risk%20Management%20Strategy%20Appendix%201.pdf)

6 [links to the report issued in July https://www.thersa.org/action-and-research/rsa-projects/public-services-and-communities-folder/food-farming-and-countryside-commission](https://www.thersa.org/action-and-research/rsa-projects/public-services-and-communities-folder/food-farming-and-countryside-commission) before the (then) Secretary of State for the Environment, Michael Gove MP.

*"Nowhere do conflicts in food, farming and the countryside show up more than in discussions about how we use our land and who decides. Debates have become polarised and it is the ground on which the battles for the future of farming and the countryside are being fought.*

*Only 8 percent of rural homes are affordable, compared to 20 percent in urban areas; weekly transport costs average £132 in rural areas compared to £71 in urban areas.*

*We recommend:*

- *Establishing a national land use framework in England that inspires cooperation based on the public value of land, mediating and encouraging multipurpose uses*
- *Investing in the skills and rural infrastructure to underpin the rural economy*
- *Creating more good work in the regenerative economy*
- *Developing sustainable solutions to meet rural housing need*
- *Establishing a National Nature Service that employs the energy of young people to kickstart the regenerative economy "*

## **IBC 12 strategic objectives**

### **1. STRATEGIC WORKING – SOCS suggest inadequately demonstrated.**

#### **2. GROWTH .....'with 31% at the Ipswich Garden Suburb and 15% in the remainder of the Borough being affordable homes'**

SOCS understand that IBC has negotiated and allowed for 4% and 5% affordable homes for the outline planning consent on the IGS?

b) 'approximately 9,500 additional jobs shall be provided in Ipswich to support growth in the Ipswich Strategic Planning Area between 2018 and 2036.'

26 February 2020 Insurance giant to close Ipswich office axing 300 jobs/Anglian Water is cutting 200 jobs across all areas of the business. SOCS have repeatedly challenged the unrealistic job targets and numbers lacking credibility.

#### **3. THE DISTRIBUTION OF DEVELOPMENT - The development of the Borough should be focused primarily within the central Ipswich 'IP-One' area, Ipswich Garden Suburb, the Northern End of Humber Doucy Lane and within and adjacent to identified district centres (these areas are identified on the key diagram).**

SOCS, like NFPG, believe there is a demonstrated lack of justification for the area around Humber Doucy Lane to form part of the plan.

### **5. AIR QUALITY (Noise pollution)**

SOCS comment - 2013-Traffic Survey Work by developers

*'Consideration of the noise, vibration and traffic noise impacts from the hump back road/rail bridge elevation, separately and in combination, from both rail and road on the proposals and mitigation measures likely from the these impacts, should include an assessment for intensification over the plan period especially as Felixstowe Port is due for expansion with increased use of the Rail line planned. Environmental Impact Studies, which may be currently being commissioned, will need very careful independent scrutiny.'*

7 <https://www.planningresource.co.uk/article/1461192/go-ahead-2000-homes-ipswich-garden-suburb-despite-affordable-housing-shortfall> Considering the revised application, officers noted "significant costs" in providing infrastructure to enable delivery of the site and "recognised that the viability position has got worse" since the agreement was negotiated. They concluded: "The provision of 15 per cent affordable housing and all of the s106 obligation would make the scheme unviable." The newly agreed s106 package amounts to around £14.75m, they said. For the Crest Nicholson scheme, the council agreed to an affordable housing level of five per cent and agreed to four per cent for the Mersea Homes scheme.

*Red House Site, has a minimal green buffer next to the railway. Added to this is the Railway is partly elevated and already causes significant noise nuisance problems currently by the generating of significant noise from freight through the night. Upgrades and increased use of the line due to Felixstowe Port expansion needs assessing in relation to the Draft SPD proposals for Red House, particularly in relation to the very highest densities which have been proposed."*

We now have the 5 point Rail Plan agreed 2018, with Network Rail and NO assessment of pollution from diesel trains currently in use.

**Current rail noise levels have given rise to residents complaints and can be heard for a distance of about 1/4-1/2 a mile at night causing significant sleep disturbance especially in summer.**

**6. TRANSPORT AND CONNECTIVITY**

**9. NATURAL ENVIRONMENT**

**10. COMMUNITY FACILITIES AND INFRASTRUCTURE** – The current situation in the Health Service is worrying -with access to services GPs and the possibility of flu pandemic. Ipswich no longer have a dedicated Drainage Engineering department and team, so have no internal independent expertise to call on for Flood matters and drainage.



Comments within the following text

For ease of reference we provide a summary of our key concerns which show that the CS is not sound without modifications to these areas.

**Transport and improving accessibility**

1. Previous modelling has shown that many junctions and link roads in Ipswich are already at/near capacity, but this is not addressed in the CS. There is no evidence that proposed growth in the CS is sound in relation to transport proposals in the years up to 2026.
2. Transport modelling shows severe capacity issues in 2026 at many key junctions in and around Ipswich that will result in gridlock but there are no transport infrastructure projects included in the Infrastructure Tables to resolve these capacity constraints. This is especially the case in and around the town centre, Ipswich Garden Suburb and the A1214.
3. The Transport modelling fails to identify when these Ipswich junctions will reach capacity (evidence shows that some already have) and consequently the CS fails to adequately plan for this.
4. IBC is failing to Improve Access in Ipswich in breach of CS5. More needs to be done otherwise the Modal Switch assumptions used in the traffic modelling are too high and unsound resulting in non-compliance with CS20 Transport. The CS is not justified with respect to Improving Access and Transport.
5. The Committee on Climate Change assumes that there will be a 10% transport modal shift by 2050. Where is the evidence that IBC can deliver around 15% modal shift by 2026 ? - a ridiculously short timeframe for such a high target. Unless IBC can provide evidence that it can achieve higher levels of modal shift than the CCC thinks feasible, the CCC assumption should be used in the modelling work for the CS to be sound.
6. Evidence shows that the existing walking and cycling infrastructure in Ipswich is clearly sub-standard and will not enable delivery of the levels of modal shift required without substantial improvements.
7. There is no funding allocated during the four-year period in IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS<sup>8</sup> to encourage modal shift, for example to change behaviours and improve cycling and pedestrian infrastructure.

<sup>8</sup> <https://democracy.ipswich.gov.uk/documents/s27023/C-19-19%20MTFP%20Appendix%201%20-%20Financial%20Strategies%20and%20Medium%20Term%20Financial%20Plan%202020-21%20Onwards.pdf>

8. The CS is not justified as it does not take account of proportionate evidence, especially in relation to modal shift assumptions. The New Evidence database is incomplete as it excludes several key Transport documents, especially those in relation to modal shift and the S106 schedules for the approved Ipswich Garden suburb developments which have not been made available to the Public in time to examine as part of this Consultation.
9. We are concerned that the two road bridges (and country park) may not be delivered in time (February 2022) to receive the £9.8m Housing Infrastructure Funding. If this is the case, then the CS is unsound unless IBC can confirm alternative funding will be available.
10. We are concerned that the CS is not completely positively prepared as it fails to fully assess transport infrastructure requirements, including walking and cycling infrastructure, especially in relation to timing of delivery (and as sewage infrastructure requirements).

## Air Quality and the environment

11. The CS is not consistent with national air quality policy as it fails to ensure compliance with legally binding limits. There needs to be a requirement to comply with these for the CS to be sound.
12. The CS needs to strengthen the commitment to Improve Air Quality as there has been no real improvement in Air Quality in Ipswich over the past decade with the number of AQMAs in Ipswich increasing.
13. There is no funding allocated during the 4-year period in IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS for improving air quality.
14. There is no Air Quality Assessment provided as part of this consultation. This needs to be completed urgently and needs to include assessments for the early years of planned developments, all construction-related traffic (including sewage infrastructure projects) and rail/sea traffic. It needs to examine the impacts of different levels of modal shift rather than assume the unsubstantiated, extremely high levels of modal shift assumed in the transport assessment will be delivered by 2026 and thereafter.
15. There is little point in undertaking an Air Quality Assessment in 2036 as the ban on non-electric vehicles will have been implemented. It is the early years of the CS where air quality is most likely to be worst. We believe that an earlier assessment than 2026 is therefore required e.g. 2023 and perhaps 2029/30 (prior to the ban on non-electric vehicles) rather than 2036 when there will be a significant number of electric vehicles.
16. At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency. The CS needs to be updated to incorporate this to be sound.
17. We strongly object to the re-designation of the Ipswich "green rim" to "green trails". This is in breach of DM13 and unsound.
18. The current situation regarding flood risk assessment within the CS is ambiguous and somewhat confused. This needs to be clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be sound and understood by residents.(The following is a better map to illustrate risks.)
19. A key problem with the Sustainability Appraisal, Habitats Assessment and Health Impact Assessment are that they simply assume that the CS will be fully implemented and that full funding for all the measures identified in the CS will be secured. There is no evidence that IBC (in conjunction with SCC) can deliver the substantial improvements in walking, cycling and bus infrastructure, improved road infrastructure and the unprecedented levels of modal shift required for the CS to be sound. IBC and SCC's track record in these areas is dire - what evidence is there that this will change?
20. The Sustainability Assessment is incomplete and underplays many key issues. It needs to fully assess air quality impacts including from rail and sea, the impacts of the additional road infrastructure required to prevent junctions reaching capacity , the proposed re-designation of the Green Rim, alternatives to building on Humber Doucy Lane (and that Suffolk Coastal no longer needs this land to meet its housing target), flood risk and the impacts of the new sewage infrastructure that will be required to deliver the CS. It especially needs to assess the robustness of the CS if the unprecedented levels of modal shift are not achieved.

21. The same issues relating to the Sustainability Appraisal apply to the Health Impact Assessment.

22. The Habitats Assessment also needs to take account of the same issues.

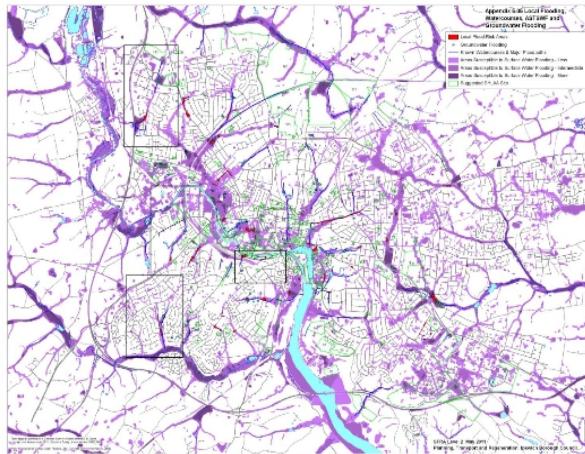
## 9 MAPS

Surface water & ground water flooding maps are followed by tidal & fluvial maps.  
Use "zoom in" to view more detail or download SFRA documents where links are provided.

AO or A1 paper copies can be supplied on request (there will be a charge).

### 9.1 SW Flood Map

This shows the EA's map "Areas Susceptible to SW Flooding" (ASTWF) together with IBC's historic local flood map (in red) which also shows approximate locations of reported ground water flooding, watercourses and major flood paths.



ASTWF may be subject to refinement by FRA's. The SWMP has already refined the ASTWF map in the 4 locations indicated by the rectangular boxes – maps for parts of these areas follow.

Assumptions made in producing the ASTWF map are described in the EA's document.

<http://www.environment-agency.gov.uk/research/planning/129324.aspx>

## Other

23. There are still no firm proposals for new sewage infrastructure that is required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables.

24. The proposal to allow development in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road is not justified and therefore unsound. Land in the centre of Ipswich earmarked for expanded retail and car parking (which we believe is surplus to requirements), should be used for new homes instead. There is no SA of this viable alternative.

25. The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector<sup>9</sup> from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756). Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) it had included in its final draft plan<sup>10</sup> (paragraph 12.209). The SA fails to assess this and is unsound.

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[https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk\\_Coastal\\_Local\\_Plan\\_Post\\_hearings\\_letter.pdf](https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk_Coastal_Local_Plan_Post_hearings_letter.pdf)

10 <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

**26.** Specific Objectives are required to ensure delivery of key aspects of the CS such as improving transport infrastructure, improving air quality, delivering modal shift and improving accessibility are required. These need to be monitored and reported on to ensure the CS is effective.

### **Consultation Statement Ipswich Borough Council Local Plan Review Preferred Options** **January - March 2019**

We are concerned that our comments on CS5 and CS20 in relation to the transport modelling and modal shift (and associated air quality issues) have not been adequately considered. IBC appears to be adopting the approach that SCC's Transport Mitigation Strategy for the Ipswich Strategic Policy Area (IPSA)<sup>11</sup> will totally resolve all the traffic issues and fully deliver the required levels of modal shift for the CS to be sound, without substantiating this with any evidence that it will. Until such evidence is provided the CS cannot be considered effective or justified. It is particularly disappointing that the Transport Mitigation Strategy and other relevant modal shift documents have not been included in the Evidence Base. We agree that extremely high modal shift levels will be needed but believe that the new infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary for the CS to be sound. The level of funding needed to deliver this is massively under-estimated. There is also a significant shortfall in guaranteed funding for the insufficient measures identified in the Plan. IBC has yet to respond to these concerns.

#### **Para 5.25**

Improving air quality in the increasing number of Ipswich AQMAs (now five) needs to be added as a key challenge as IBC is legally required to reduce pollution levels to legally binding limits and has failed to do so; there have been no material improvements to air quality and IBC is non-compliant with its CS in this respect. The planned growth levels for Ipswich will further challenge this requirement.

Given the high levels of modal shift required, IBC should be "delivering high levels of modal shift" rather than just "guiding as many trips as possible to sustainable modes". The current draft under-estimates the difficulty and importance of the task.

Meeting the Climate Emergency also needs to be added as a key challenge as Ipswich Borough Council has committed to tackling this issue. Not to include it would be unsound.

**Para 5.26 Table 2** – for ease of reference we have included all our comments on flood risk below, but these should be considered for all other references of flood risk in the CS

This states that "*In addition, as part of the final draft Local Plan, a refresh is being prepared of the Ipswich Strategic Flood Risk Assessment (SFRA).*" Paragraph 6.1.6 then states that "*The Council's Level 2 Strategic Flood Risk Assessment (SFRA) was revised in 2019. It provides guidance on residual flood risk both for the situation before and after completion of the flood barrier. The SFRA also suggests a framework for safe development. The safety framework is detailed in the Council's Development and Flood Risk SPD (September 2013) which is in the process of being updated*". It is not clear which Safety Framework applies to the CS.

However, the IBC FRA webpage<sup>12</sup> only references the 2011 SFRA version and does not show the 2019 version referenced above. We also note that the Local Plan New Evidence database includes a draft 2020 SFRA as well. It is not clear when or if this has been adopted. The IBC website also states that

<sup>11</sup> <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/ISPA-Transport-Mitigation-v13F.pdf>

<sup>12</sup> <https://www.ipswich.gov.uk/content/strategic-flood-risk-assessment-sfra>

the Flood Risk SPD “was first updated in May 2014 and has subsequently been updated in January 2016 to reflect changes to national and local policy and guidance<sup>13</sup>.”

Paragraph 8.45 states “On flood risk, it concludes that an updated Strategic Flood Risk Assessment is needed to model the boundaries of Flood Zones 3a and b; drainage strategies should be prepared for all sites; and the sequential and exception tests need to be applied to all sites in flood zones 2 and 3.” It is not clear if the draft 2020 SFRA meets this requirement. The paragraph then goes onto state that “Further guidance is contained in the Development and Flood Risk Supplementary Planning Document 2016”. It is not clear whether the 2016 SPD adequately reflects the draft 2020 SFRA.

Paragraph 8.46 states that “the Ipswich Surface Water Management Plan<sup>14</sup> was produced in [June] 2012 and is currently under review”. This is clearly obsolete and fails to take account of climate change. Under the NPPF hierarchy for managing flood risk, this is the key document/means of controlling flood risk. This review needs to be completed urgently and incorporated into the CS for it to be sound.

Paragraph 8.225 states that “Part C of this document includes policies relating to flooding to reflect the NPPF and the detailed findings of the Ipswich Strategic Flood Risk Assessment”. But it does not reference which SFRA version it relates to. IBC needs to confirm that this is compliant with the draft SFRA 2020

Policy DM4 states that “it [development] will be adequately protected from flooding in accordance with adopted standards of the Suffolk Flood Risk Management Strategy<sup>15</sup>;” However, the document was produced in 2016 so doesn’t include the full risk of flooding from climate change so there is no assurance that development will be adequately protected.

Suffolk County Council’s Preliminary Flood Risk Assessment (PFRA) was published in 2011<sup>16</sup> and had a 3 page addendum<sup>17</sup> in 2017. A Preliminary Flood Risk Assessment (PFRA) is an assessment of floods that have taken place in the past and floods that could take place in the future. It considers flooding from surface water runoff, groundwater and ordinary watercourses. This is also therefore out of date and will not fully take account of climate change. We believe an update is required to ensure the CS is sound.

In the 2017 Addendum, SCC used a national data set to predict flood risk but these do not include climate change allowance output, so SCC have projected the potential number of properties at risk for the 0.5% AEP for the PFRA. The results show that Ipswich is the area at greatest flood risk and has been identified as a Flood risk area (FRA) for the purposes of the Flood Risk Regulations (2009) second planning cycle. The Addendum states that “To improve SCC understanding of climate change in priority areas, local modelling updates will assess the impact of climate change.” It is not clear whether this modelling has been done or how it has been included in the CS. Clearly this needs to be incorporated into the CS for the CS to be sound.

The current situation regarding flood risk assessment within the CS is ambiguous and confusing and makes the CS flood risk situation impossible to understand for the general public. This needs to be

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13 <https://www.ipswich.gov.uk/content/development-and-flood-risk-spd>

14 <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Surface-Water-Management-Plans/Ipswich-Flood-Risk-Management-Strategy-v12.pdf>

15 <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/2018-Strategy-Documents/2016-04-Suffolk-Flood-Risk-Management-Strategy-v12.pdf>

16 <https://www.suffolk.gov.uk/assets/Roads-and-transport/Flooding-and-drainage/SUFFOLK-PFRA-REPORT-FINAL.pdf>

17 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/698246/PFRA\\_Suffolk\\_County\\_Council\\_2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698246/PFRA_Suffolk_County_Council_2017.pdf)

clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be understood by residents and for it to be sound. Given the current terrible flooding and that Ipswich is a FRA, this is a key issue that needs correcting.

### **Para 6.7**

The Vision needs to include an improvement in air quality levels and compliance with legally binding targets that are currently exceeded. IBC should have a Strategic Policy to comply with legally binding air quality targets and eradicate AQMAs within Ipswich for the benefit and protection of residents. The Climate Emergency also needs to be recognised in the Vision (please see our comments under CS1).

### **Objective 6.8.4**

This Objective needs to be strengthened to recognise the Climate Emergency for the CS to be sound (please see our comments under CS1).

### **Objective 6.8.5**

It is not clear what the 2004 levels are or how progress against these will be measured; 2004 emissions levels should be included in the CS for completeness so that the target is clear. For example, do 2004 measuring locations correspond with the current measuring locations and if not, how will IBC determine whether levels have returned to 2004? Furthermore, it is not clear when IBC aim to return to 2004 levels. This needs to be done as a matter of urgency and should not be left to 2036 as would be possible under the current Plan, by which time many more Ipswich residents will have died prematurely. IBC needs to comply with legally binding targets otherwise its CS is unsound.

### **Objective 6.8.6**

IBC has decided to remove its previous Objective to achieve modal shift of 15% by 2031 in the current Local Plan and needs to be asked why given this is still required for the CS to be sound. SCC Transport modelling (which we discuss later) confirms that major modal shift is required to deliver the CS (e.g. c15.5% by 2026 for existing journeys). Given the importance of achieving high levels of modal shift to deliver the Plan, it is imperative that a modal shift target for 2026 is included for the CS to be sound. IBC needs to explain why it no longer thinks having a modal shift target is important.

Ipswich CS Authority Monitoring Report 13, 2017/18 June 2019 fails to adequately report back on the current Objective 6 f. TARGET: To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031. Simply stating "*The Travel Ipswich measures have now been implemented. This target will be reviewed through the Ipswich Local Plan review.*" We believe the reason that the target has not been reported on is that little or no progress has been made and the that is has been removed because IBC knows it cannot be achieved. IBC needs to report the modal shift levels achieved through Travel Ipswich (formerly known as Ipswich – Transport Fit for the 21<sup>st</sup> Century) as this will indicate what levels of modal shift can be achieved in Ipswich.

We also note that Appendix5, pg 55 states "*The 2018 Travel to Work survey ran from the 7th May to 29th June 2018, outside the 2017/18 monitoring period. The 2018 results show that driving (single occupant and car share) remains the most frequently used mode of travel at 64.7% in 2018, an increase from 62.6% in 2017. The percentage of those travelling as a single occupant has risen compared to last year and currently stands at 62.6%, 3.5% higher than in 2017.*" This illustrates how difficult the required levels of modal switching will be to achieve, without which the CS is clearly unsound.

We believe IBC has failed to make any progress on the modal shift target of 15% by 2031. It clearly needs to provide evidence that it can deliver the required modal shift levels identified by SCC (e.g. c15.5% by 2026 for existing journeys) for the CS to be sound. If not, the CS needs to be revised accordingly to be sound.

IBS states that “*Additional east-west highway capacity could be provided within the plan period*” and needs to illustrate what it means by this and whether such capacity is required for the CS to be sound.

Paragraph 8.19, which states “*In addition to the integrated transport solutions, including bus network improvements within the town and increased capacity of the local rail offering, a northern route around Ipswich is expected to be needed to enable growth in the longer term.*” Ipswich Borough Council states support for such a route. We would like to draw attention to the article in the Ipswich Star (27 February 2019<sup>18</sup>) where the leader of Ipswich Borough Council, David Ellesmere, is quoted as saying “*A northern bypass is a priority infrastructure project for Ipswich*”. A position that was repeated in the East Anglian Daily Times Article<sup>19</sup> published on 22/02/2020 “It remains our position that the best solution would be the construction of the inner route of the northern bypass [to ease traffic problems in Ipswich]. Both the previous Labour and current Conservative Ipswich MPs have also argued for a northern route as a priority for Ipswich. This paragraph and the CS need to be updated to take account of the decision that the northern route will NOT be progressed further by SCC. Ipswich Borough Council needs to explain why its elected leader clearly believes that Ipswich cannot cope with existing volumes of traffic and that it is sound for the CS to increase traffic further. The Local Plan also needs to recognise that Suffolk County Council is also concerned about the ability for Ipswich to manage the existing volumes of traffic and announced on 18 February 2020 that it is setting up a taskforce to look at new ways of tackling the town's traffic problems. In response to the creation of the Suffolk County Council taskforce to improve Ipswich traffic David Ellesmere is quoted in the East Anglian Daily Times as demanding “a new link road connecting Europa Way with Bramford Road to alleviate traffic pressures, and work to explore a new road link connecting London Road, Hadleigh Road and Sproughton Road”.

Unless there is a huge change in public attitudes and behaviour plus substantial investment in other means of sustainable travel, improving the existing road infrastructure, including new technology, homeworking incentives, off-peak travel pricing incentives, regulatory instruments etc, **the plan will fail. A culture change will be needed. This is what the Start Ipswich Moving Campaign sets out to achieve.**

The future shift to electric cars will not suffice. There is equal serious health impacts from particulate matter from vehicle brakes and tyres <sup>20</sup> (Inside Health BBC Radio 4 Air Pollution; Infectious Disease). **The number of cars as well as the vehicle emissions is the problem.**

Considerable investment in public transport is required to deliver the Plan. Currently IBC has insufficient firm proposals or funding to deliver the required 2026 modal shifting target and subsequent modal shift levels throughout the CS period. The CS is therefore unsound as it lacks a credible transport solution that would support the proposed levels of growth.

### **Para 6.17**

We challenge the need for future development after 2031 in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road, which is no longer required by Suffolk Coastal to meet its housing target as this has been reduced substantially by the Planning Inspector:

1. **The Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018**  
Section 4.3 Land Northeast of Ipswich IP2 (Suffolk Coastal) recognises the sensitivity of the

18 <https://www.ipswichstar.co.uk/news/ipswich-northern-bypass-latest-1-5908955>

19 <https://www.eadt.co.uk/news/ellesemere-on-travel-taskforce-1-6527021>

20 <https://www.bbc.co.uk/programmes/m000fgf7>

open land between the edge of suburban Ipswich and the villages of Westerfield and Rushmere and that the area forms an important corridor of land. It states that “opportunities lie in the strengthening of landscape structure, softening of the urban edge and reinforcement and creation of corridors which penetrate the urban area”. It concludes that the area is “sensitive to development” and “care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town”. These comments will clearly also apply to the open land within the Ipswich boundary. Even more so as the land is nearest the edge of suburban Ipswich and there is substantially less open land within the Ipswich boundary than Suffolk Coastal. We also note that this report was produced before the Ipswich draft CS proposal. Therefore, it does not consider the impacts of building on the open countryside within the Ipswich boundary, which will increase the sensitivity of the Land Northeast of Ipswich IP2 as described in this report. In our view, this land is too important and sensitive to be built on, especially as it will result in the need for an additional primary school, which has additional traffic implications.

2. We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new homes. Town centre homes are likely to have a far lower impact on traffic congestion and air quality than on the outskirts of Ipswich. We believe that there are opportunities to convert some of the existing excess town centre retail property into new homes. This approach should be used instead of building on at the northern end of Humber Doucy Lane and Tuddenham Road, which will add to traffic congestion into the town centre and along Valley/Rd/Colchester Rd etc. We note that Ipswich Central is also advocating an increase to the number of homes in the town centre<sup>21</sup>. This will help improve the town centre and the night-time economy, reduce traffic into the centre town (compared to other new build sites), facilitate modal shift and improve air quality. Why has this option not been considered by IBC?
3. We believe that the Parking Strategy over-estimates the parking demand, and hence the required land, for town centre parking and that this brownfield land would be better used for housing rather than the previously designated countryside at Humber Doucy Lane.
4. Traffic modelling shows that traffic from the development will further increase traffic at junctions that are already over-capacity without any road infrastructure projects proposed to rectify this forecast over-capacity.
5. The allocation of this land for housing is in breach of Policy CS16 regarding the protection and enhancement of green corridors and the CS “Green Rim” (regardless of the land having been designated as countryside). In our view, this is why Ipswich Borough Council wants to re-designate the green rim as bike and cycle trails without any justification and a distinct lack of cycle trails in the “green trails”. We discuss this in detail in our comments to Chapter 7, which should also be considered here.
6. The allocation of this land for housing is in breach of the current CS. POLICY DM8: The Natural Environment POLICY DM10: Green Corridors. It is also counter to the principles of POLICY DM11: Countryside and should remain classified as part of the Green Rim. It is also effectively non-compliant with Paragraph 8.80 as it is inconceivable there will be net gains in biodiversity and green infrastructure by building on the green rim.
7. The allocation of this land for housing is in breach of the current CS in relation to the corresponding Policies and Diagram 3 The Ipswich Core Diagram where it is designated as Green Rim. IBC has not provided enough evidence to justify this change of classification from countryside.
8. The North East Character Study recognises the benefits of this site as “a rural buffer” as open fields/countryside to urban Ipswich. Given the lack of such land in Ipswich, it is too important to be lost.
9. The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector<sup>22</sup> from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756) i.e. a reduction of 720 homes over

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21 <https://www.ipswichstar.co.uk/news/ipswich-needs-4-000-new-homes-1-6516012>

the Plan period. Clearly Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) that it had included in its final draft plan<sup>23</sup> (paragraph 12.209) and the allocation of this land is therefore not sound.

Regardless, there should be no development of this land until the completion of the IGS. This needs to be made clear in the CS. For the CS to be effective, the Sustainability Appraisal needs to fully assess the implications on building on this site and whether delivering more homes in the town centre instead of retail expansion might be a more sustainable option.

## **CHAPTER 7: The Key Diagram** (and all other references to the green rim/trail)

We strongly disagree with the proposed change to replace “green rim” with “green trail” in (v) The ecological network, green corridor and green rim approach to strategic green infrastructure (policy CS16). The proposed change to the green rim has not been assessed by the Habitats Regulations Assessment (HRA) and needs to be included in the HRA accordingly.

The existing green rim is an asset and should be protected by adding it to Policy CS4, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it and hence destroy it.

The Ipswich Local Plan – Regulation 19 draft presented at the Council Meeting on 8<sup>th</sup> January 2020 states, in the last paragraph of Section 2.47 The Development Management, that “*There has been some confusion arising from the Preferred Options consultation responses on the purpose of the ‘green rim’, which are principally orbital routes for walking and cycling around the periphery of the Borough although it is acknowledged that they are important routes for biodiversity and the wider ecological network. It is suggested that these be renamed as ‘green trails’ which shows that these areas are also connected with walking and cycling.*”

It is our view that the Council in its paper is mis-leading Councillors as the concept of corridors and the green rim was for the corridors to provide access on foot or by cycle to the countryside surrounding Ipswich. That countryside then became known as the green rim and the intention was for the green rim to be protected from development. We note that in subsequent CSs the green rim has been considerably reduced in size, which demonstrates the Council’s lack of commitment to protecting open space and improving biodiversity in its own Plans. The change in definition is effectively non-compliant with policy DM8.

In our view, the Council is doing this so that it can bring forward land around Humber Doucy Lane, which has previously been designated as countryside, and then as part of the green rim, for development in the revised draft of the CS by removing the protection that it currently has. If the Council wants to do this then it should be clear and transparent that it proposes to build on land previously designated as countryside/green rim rather than by deviously trying to re-designate the land as a pedestrian/cycle green trail (which was never the intention of previous CSs). We believe that there are other brownfield sites in Ipswich that could be used instead.

In Appendix 1, we illustrate the history of the green rim/corridors in various drafts of the CS below and include a comparison of actual cycle routes to the revised green trails demonstrating that it is the Council that is “confused” about the original purpose of the green rim. We also note that there is no

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[https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk\\_Coastal\\_Local\\_Plan\\_Po st\\_hearings\\_letter.pdf](https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk_Coastal_Local_Plan_Po st_hearings_letter.pdf)

23<sup>25</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

mention of the Green Rim (or Green Trail) being used for cycling in the Ipswich Cycling Strategy<sup>24</sup> adopted in March 2016 as part of the CS.

## **Chapter 8 Scale and location of growth**

We have argued for many years that previous homes and employment targets set by Ipswich Borough Council were too high, unrealistic and based upon flawed evidence. It is now clear that previous Plans were unsound and by their very nature were therefore sub-optimal for Ipswich as we argued strongly at the time. It is disappointing that Ipswich Borough Council has taken so long to accept this. We believe the proposed lower targets are more realistic. We agree with IBC that it has established a 5-year land supply of 5.06 years including a 20% buffer or contingency in the 5-year supply.

## **Policy ISPA2 Strategic Infrastructure Priorities**

This needs to include the following highway schemes that SCC assumes will proceed in Ipswich in its ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2 along with the dates they are required by. Without these being implemented the modelling work, and hence the CS is unsound.

1. Bixley Road / Heath Road / Foxhall Road Additional lane NB for Bixley Road / Additional lane SB for Heath Road
2. Nacton Road / Maryon Road Turn WB Nacton to two lanes, and EB Nacton to one lane
3. Upper Orwell Street Changed to one-way southbound from St Helen's Street
4. St Helen's Street / Bond Street Bus lane removal (we question how this will improve bus services?)
5. Ipswich Radial Corridor Route improvements - Felixstowe Road. Capacity increase to Felixstowe Road & Bixley Road arms of roundabout with A1156 Bucklesham Road. Capacity increase at Bixley Road / Ashdown Way junction
6. Ipswich Garden Suburb – Henley Gate Two signalised junctions included as part of site access onto Henley Road
7. Ipswich Garden Suburb – Fonnereau Priority controlled junction included on Westerfield Road in relation to access
8. Ipswich Garden Suburb – Red Hill Farm Two priority-controlled junctions included on Westerfield Road, north and south of Fonnereau access junction
9. A1214 Valley Road / Westerfield Road Increased capacity modelled on A1214 approaches to roundabout due to flares
10. A1214 Valley Road / Tuddenham Road Increased capacity modelled on A1214 approaches to roundabout due to flares
11. Europa Way link road Link road between Sproughton Road and Bramford Road, extension of Europa Way with priority-controlled roundabouts
12. A1214 / Bell Lane Ban of right turn from A1214 onto Dr Watson Lane. Signalised junction of A1214 / Bell Lane changed to priority-controlled roundabout [we note this is not in Ipswich and appears to have been incorrectly grouped under Ipswich]

This list excludes improvements to the Henley Road/Dale Hall Lane junctions with Valley Road which are required to be delivered by Crest Nicholson after occupation of the 299th home on its Henley Grange IGS site (as stated in the planning application Decision Notice). It needs to be confirmed whether this infrastructure project has been included and modelled accordingly. It needs to be added to the list of projects.

We support the inclusion of sewage infrastructure in ISPA2. We have argued for this for many years and its inclusion is long overdue. We believe specific reference to it being required for the delivery of the Ipswich Garden Suburb, which still has no agreed site-wide sewage infrastructure solution after over 10 years of planning for one.

24 [https://www.ipswich.gov.uk/sites/default/files/cycling\\_strategy\\_spd.pdf](https://www.ipswich.gov.uk/sites/default/files/cycling_strategy_spd.pdf)

## **Policy IPSA4 and Paragraphs 8.24-8.26**

Please see comments on Paragraph 6.17. Paragraph 8.24 states that development will “follow the delivery of the Ipswich Garden Suburb”. We disagree on the need for this land to be developed, but if it is then it needs to be made clear throughout the CS document that this can only happen following the delivery of the IGS development, rather than “appropriately phased”. Without this stipulation it could detrimentally impact on demand for homes at the IGS leading to a stalled and incomplete development of the IGS for many years. It is premature to phase it with the IGS development rather than at the end of the IGS development.

## **Policy CS1**

Sustainable Development needs to reflect the legal requirement to comply with Air Quality targets, as well as considering them elsewhere in the CS for the CS to be sound.

At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. This commitment will clearly impact on the CS and needs to be referenced here and in relation to other relevant policies e.g. DM1 and DM2 for the CS to be sound. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

## **Policy CS4, Policy CS17 and DM8**

The existing green rim is an asset and should be protected, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it (see above). It should be included in CS4 accordingly for the CS to be sound.

We have some concern that IBC may not be providing enough recreational mitigation for its RAMSAR sites. It is not clear what RAMS S106 payments (agreed on 30/01/20) have been agreed with CBRE and Crest IGS sites as the S106 have not been made publicly available by IBC with its Decision Notice in February 2020 on granting outline application approval.

### The Suffolk Coast European Sites Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (SPD) 2019

This was approved by the Executive on 7th January 2020, which implies the S106 agreements should include RAMS mitigation payments as they were agreed after the SPD was approved by the Executive.

We note that Paragraph 2.4 states "*It should be noted that some residential schemes, particularly those located close to a European Site boundary or large scale developments, are likely to need to provide additional mitigation measures (in addition to the tariff) such as Suitable Alternative Natural Green Space (SANGS) or green infrastructure measures. This would need to be assessed through a project level Habitats Regulations Assessment (HRA) (including Appropriate Assessment).*" Therefore, it would appear that the delivery of the Country Park is therefore an additional requirement to the RAMS tariffs.

However, IBC did not request any S106 contributions from either CREST or CBRE for any of their homes on the IGS for recreational mitigation when the outline application was approved subject a

number of conditions at the Planning & Development Committee Wednesday 4th April 2018  
CREST - Para 5.16 of <https://democracy.ipswich.gov.uk/documents/s20697/Item%2001.pdf> other than £7.5k HRA for monitoring  
CBRE - Section 10 of <https://democracy.ipswich.gov.uk/documents/s20700/Item%2002.pdf> other than £7.5k HRA for monitoring

The SPD also states

*3.2 What types of application does this apply to?*

*The Suffolk Coast RAMS tariff applies to all full applications, outline applications, hybrid applications, permitted development, and reserved matters applications where no contribution was made at the outline application or hybrid application stage.*

*Sites that already have planning permission will not be required to pay any additional mitigation sum, unless they are resubmitted for consideration.*

*3.3 The Suffolk Coast RAMS contribution is payable in addition to any Community Infrastructure Levy (CIL) liability and/or any other S106 or S278 contributions for other types of contribution and there may be other site-specific mitigation requirements in respect of European Sites and ecology.*

If there are no RAMS tariffs included in the S106 agreements this could be in breach of this SPD, Policy CS4, CS17 and Policy DM31 The Natural Environment of the current Ipswich CS. It also means the new CS would be unsound in relation to CS4 CS17 and DM 8 The Natural Environment as there is no means of funding the required. We believe further examination of the issue is required to provide confidence that the CS is sound in relation to this issue.

### **Policy CS5 Improving Accessibility**

States that the Council will work with the Highway Authority including through the Local Transport Plan to manage travel demand in Ipswich and maximise sustainable transport solutions and in doing so will prioritise the development of an integrated cycle network. During the duration of the current CS and despite the agreement of the Cycling SPD, we have seen no improvements to the cycle network. Indeed, the only major changes that we are aware of are:

- The removal of the dedicated cycle lane on Felixstowe Road out of Ipswich towards Sainsburys.
- The construction of steps on the Cornhill effectively blocks off the previous direct cycle route between Lloyds Avenue and Princes Street. This was the only cross-town cycle route that did not involve the use of dangerous counter-flow cycle lanes (Northgate Street and Museum Street) in the town centre. Neither of these counter-flow cycle lanes meet cycle lane guidelines<sup>25</sup>.

Both these changes, especially the town centre one, result in a more segregated cycle network and will deter cyclists rather than encourage them. We also note that the cycle route along the Christchurch Park Bridleway remains in a dangerous state of repair since the current CS was approved. This shows a distinct lack of commitment to even maintaining the existing cycle network.

We also note that much of the Ipswich cycling infrastructure is sub-standard and fails to comply with recommended minimum standards for cycle lane width for both dedicated cycle lanes and shared

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<sup>25</sup>The desirable minimum width of any contraflow lane is 2m. Where space is constrained it may be reduced to an absolute minimum of 1.5m. The width of the with-flow traffic lane may be as little as 2.5m where there are low volumes of heavy goods vehicles and the servicing needs of shops and other premises are met by off-street loading or other means. The preferred minimum width is 3m as this is less likely to cause with-flow traffic to encroach upon the cycle lane. Cycling England A.06 Contra-Flow Cycling.

pedestrian/cycle routes. The latter acts as a barrier to both walking and cycling. The required levels of modal shift will not be delivered with such sub-standard infrastructure.

Paragraph 33 of the Transport Topic paper states that “*There has also been a variety of cycling and walking initiatives built around the balanced transport plan for Ipswich*” but fails to provide any evidence of this. The Council needs to detail the initiatives delivered by the Council in the last few years since the adoption of the current Core Strategy and the Cycling Strategy Supplementary Planning Document in March 2016 and the current CS in February 2017 and advise on the level of modal shift has been achieved by them. We have not been able to find any evidence of the levels of modal shift achieved by these initiatives (nor what the specific initiatives actually are). In relation to the provision of cycling infrastructure in the current CS, there seems to have been no progress in delivering the requirements of:

- CS5 Improving Accessibility Enables access across town safely and conveniently by foot and by bicycle - work with the Highway Authority through the Local Transport Plan prioritise the development of an integrated cycle network.
- CS16 Green infrastructure, Sport and Recreation Strengthens ecological networks that link inner and outer parts of the Borough by providing walking and cycling routes.
- CS20 Key Transport Proposals Seeks improved cycling and walking routes between key nodes.
- SP15 Improving Pedestrian and Cycle Routes Support improvements to pedestrian and cycle routes within the IP-One area and linking the town centre to residential areas and beyond.

The level of achievement by IBC will help determine how effective the CS is likely to be in delivering its accessibility and modal shift objectives and whether it is sound in these respects.

The SUFFOLK COUNTY COUNCIL Draft Local Cycling & Walking Infrastructure Plan (dated 15/03/2019 presented at Suffolk Cabinet 20/January 2020)

This identifies the requirements and options for planning of future opportunities to make improvements to the cycling and walking network. We are disappointed that this document has not been included by IBC in the Evidence Base as it clearly shows the poor existing walking and cycling infrastructure in Ipswich. The draft LCWIP assesses a number of corridors in Ipswich but does not include any actions or funding to improve these. The corridors are assessed using WRAT and CLOS assessment tools.

As part of the Welsh Active Travel Design Guidance a Walking Route Audit Tool (WRAT) was developed to assist Local Authorities with the auditing of walking routes. The auditing methodology targets the five core design outcomes for pedestrian infrastructure, which are similar to those for cycling. These are: • attractiveness • comfort • directness • safety • coherence. Each design outcome has several sub-categories that are each scored 0-2 with a score of 70% (28/40) being normally regarded as the minimum provision overall.

CLOS (cycle level of service) scores Cycling Level of Service is an audit tool developed by Transport for London. It is designed to assess the quality of cycling provision in existing (and proposed) schemes, with a final score out of 100. Good (Dutch-quality) schemes should be scoring between 70 and 80 out of 100.

In order to achieve the high targets of modal shift then, the key corridors should exceed the minimum standards of good design. However, it is clear from the assessments below that the existing walking and cycling infrastructure in Ipswich is massively sub-standard and without major improvements there is absolutely no chance of achieving the modal shift targets required and hence the CS is unsound in respect of Policy CS5 and subsequently CS20 Transport and DM3 Air Quality.

| Corridor                   | WRAT  | CLOS                                                                                                                             |
|----------------------------|-------|----------------------------------------------------------------------------------------------------------------------------------|
| Minimum level required     | 28    | 70                                                                                                                               |
| London Rd / Hadleigh Rd    | 27.2  | 58                                                                                                                               |
| Wherstead Rd               | 24.4  | 32.6                                                                                                                             |
| Henley Rd / Westerfield Rd | 24.7  | 37.2                                                                                                                             |
| Birkfield Drive            | 18.25 | 41.5                                                                                                                             |
| Hawthorn Drive             | 19.5  | 30.7                                                                                                                             |
| Inner orbital              | 31    | 45 estimated from parts that can be scored<br>unable to provide average score as some parts have no cycling or walking provision |
| Gipping River Path         | 20.6  | 44.3                                                                                                                             |
| Woodbridge Rd / Spring Rd  | 28.6  | 42.3                                                                                                                             |
| Nacton Rd / Landseer Rd    | 27.8  | 41.4                                                                                                                             |

It should also be noted that the assessments are based on the most suitable route, rather than routes walkers and cyclists might actually use so these scores will be higher than what is will be experienced on average. Clearly cycling and walking in Ipswich is currently an unattractive, unsafe, incoherent, uncomfortable experience that is also non-directional.

The Transport Modelling, which we will discuss later, includes extremely challenging modal shift assumptions. Unless IBC can provide evidence of sufficient funding and plans in place to improve the ineffective cycling network the required levels of modal shift cannot possibly be achieved, and the CS cannot be found to be sound.

We also note that Ipswich Buses, operated by IBC, continues to use the outdated approach of having bus routes that just go into town rather than establishing radial routes such as along the A1214/Heath Rd from ASDA/Whitehouse, past the hospital, to Futura Park/Ransomes/Havens. Bus route 2 currently stops at the hospital and could easily be extended to the ASDA/Whitehouse area. Such an approach would provide a more direct quicker route for many people and have the advantage of avoiding the town centre AQMAs. We would like to see the CS Preferred Options include a requirement on IBC to assess and test the viability of such bus routes to Improve Accessibility and help contribute to modal shift. Substantial investment in the Ipswich bus network is required, including the expansion of the Ipswich Park and Ride network.

#### IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS<sup>26</sup>

This Financial Plan covers up to 2023/24 and was approved at Council on 19/02/2020. Paragraph 32 identifies IBC's top ten projects for this period, which includes "*providing high quality multi-story and surface car parking*". However, there is no money allocated over the four-year period to improving air quality, delivering modal shift or improving cycle and pedestrian infrastructure (i.e. to improve accessibility) despite the CS being dependent on achieving 15% modal shift and IBC being in breach of legally binding air quality limits. There is not even any mention of 'modal shift', 'air quality', 'cycling', 'walking', 'traffic' or 'sustainable travel' in the 98 page document, which would appear to illustrate the lack of commitment of IBC to invest in improving these areas. IBC is clearly prioritising encouraging people to drive into the town centre rather than use more sustainable means. The CS is clearly not effective as IBC has not allocated any funding towards delivering modal shift or improving air quality.

#### Paragraph 8.97 and Policy C20 e) reference to the [Car] Parking Strategy and Plan

<sup>26</sup> <https://democracy.ipswich.gov.uk/documents/s27023/C-19-19%20MTFP%20Appendix%201%20-%20Financial%20Strategies%20and%20Medium%20Term%20Financial%20Plan%202020-21%20Onwards.pdf>

It is not clear if the Ipswich Parking Strategy as drafted by WYG Transport Planning dated March 2019 has actually been approved by the IBC Executive. The IBC website Decision List shows a decision by the Executive was due on 29<sup>th</sup> October 2019, but the Strategy was not on the agenda. It now seems to have disappeared from the Decision List without a decision being made. IBC needs to detail the current situation with the Parking Strategy.

Paragraph 2.4.6 states that the Strategy is based on 12,500 additional jobs target 2011-2031 on 35 hectares whilst the proposed target is for approximately 9,500 jobs on 23.5 hectares by 2036 – a substantial reduction. Paragraph 2.4.4 states that it is based on 8,840 new dwellings by 2036 – the new target is 8,010. The new targets therefore render the Strategy obsolete. With the reduction in these targets, especially new jobs, it is logical to assume there will be a reduced requirement in land for car parking. We believe this brownfield land would be better used for housing before any development of the Humber Doucy Lane site. The CS is unsound in allocating the Humber Doucy Lane site for housing ahead of excess brownfield car parking sites. As shown in its FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS, IBC is prioritising improving town centre car parking and encouraging car journeys into town ahead of funding the encouragement of more sustainable forms of transport. This is in breach of the proposed CS

At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. The Car Parking Strategy drafted in March 2019 needs to take account of this, especially given the Council operates many car parks in Ipswich, for the CS to be sound. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

### **Policy CS10 Ipswich Garden Suburb**

We have major concerns on the ability of the road network to cope with the additional traffic from the IGS without some form of northern relief road.

We are pleased that IBC secured £9.8m from the Housing Infrastructure Fund for the country park and the two road bridges over the railway. We believe this money is required to be committed by March 2022 (following an extension to the original date of March 2021). If this is the case, we are concerned that this critical infrastructure may not be delivered in time to secure the funding as work is yet to start on-site. We are particularly concerned that the relevant Decision Notices granting Outline Planning Permission for the Crest Nicholson IGS development only requires the Vehicular Bridge to be delivered upon the delivery of 699 homes. Clearly it is impossible to build this number of homes before March 2022 although it may be possible to demonstrate "commitment" as required by the HIF. We are already concerned that the existing Henley Road bridge over the railway is not wide enough to allow cyclists, pedestrian and cars to pass safely yet there are no improvements planned for this bridge. Without the early delivery of the road/pedestrian bridge and associated links into town that avoid the Henley Rd rail bridge, there is no safe walking/cycling route from the Crest Henley Gate development into town and the CS would consequently be unsound.

The Section 106 agreements for the two approved IGS sites may well include measures to safeguard HIF funding, or provide for other means of securing the required funding. These are technical and complex documents that are difficult for the public to understand. We believe that IBC needs to provide evidence that this infrastructure will be delivered in time to secure the funding and that contingency measures are in place to secure alternative funding for this infrastructure for the CS to be considered sound. As we discuss later in our submission the delivery of the IGS road infrastructure problems needs to be compatible with the dates assumed in the SSC traffic modelling. Evidence needs to be provided this is the case, before the CS can be found to be sound.

We are pleased to see that S106 payments agreed for the two approved IGS sites include funding for improved off-site infrastructure such as improving the Bridleway, cycle routes and providing crossings on Valley Road and Park Road. However, the trigger points for these payments are split into three instalments, with the last one prior to occupation of 500 homes for the CBRE/Mersea site and 600 homes for the Crest Nicholson site. Unless funding is provided from elsewhere to deliver the offsite infrastructure earlier than these trigger point dates, the required levels of modal shift will not be achieved by 2026 as the required sustainable travel infrastructure around the IGS will be incomplete.

We note that the S106 payments schedule for Henley Gate requires Crest Nicholson to deliver the Smarter Choices Programme for homes between Norwich Road and Henley Road (bounded by Valley Road). However, this is not required to commence until occupation of the 500<sup>th</sup> home. Consequently, there will be no modal shift programme implemented for this area in time to deliver the 15% modal shift requirement that is assumed in the transport modelling by 2026. The CS is therefore unsound in this respect.

WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions January 2020

3.9 IPSWICH RESULTS SUMMARY show that even with the high levels of modal shift and new infrastructure many junctions will become unacceptably congested around the Ipswich Garden Suburb.

3.9.1. Several of the A1214 corridor junctions operate with an overall V/C greater than 85%.

- A1214 / Dale Hill Lane – approaching capacity in AM/PM peaks in 2036. [Although not stated we also note that this junction is approaching capacity in 2026.]
- A1214 / Henley Road –approaching capacity in 2036 AM/PM.
- A1214 / Westerfield Road – approaching capacity in 2036 AM/PM peaks.
- A1214 / Tuddenham Road – approaching capacity in AM peak in 2036.
- A1214 / Rushmere Road – approaching capacity 2036 AM/PM peaks.

However, previous modelling for both Application IP/16/00608/OUT Land North Of Railway And East Of, Henley Road, Crest Nicholson (see Paragraph 5.121) and Application IP/14/00638/OUTFL Land To South Of Railway Line, Westerfield Road, CBRE/Mersea Homes (see Paragraphs 5.69 and Paragraph 8.484) has shown that these junctions are already operating at or near capacity at peak times and will continue to do so. By applying a 15% modal shift reduction, the modelling is hiding the fact that Ipswich roads are already heavily congested with many roads already operating at capacity at peak times.

In addition, Figures 15 and 16 also illustrate the many links that reach capacity, most notably on most of the A1214 from the hospital to Bramford Rd and on surrounding roads around the Ipswich Garden Suburb. Further modelling of these junctions and links at capacity at Peak times and either side of the peaks, is required to assess the impacts throughout the day. If they remain congested for long periods, then clearly the CS cannot be found to be sound for Transport and Air Quality. The modelling work needs to identify when these junctions and links reach capacity and how congestion will be mitigated as evidence for the CS to be sound; there is a big difference with this happening in say 2027 or 2035 between the modelled periods or even before 2026 in some cases.

We are also concerned that the modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads such as Elsmere Road and Dale Hall Lane as well as Park Road, which are not designed for heavy traffic and have not been included in Air Quality Assessments. It is obvious that in 2026 air quality will be worsened on these roads, which is in breach of the CS and therefore unsound. We note that this level of excessive congestion is forecast even if high modal; shift rates are achieved etc. We are also concerned that Air Quality limits will worsen between now

and 2026 yet there is no assessment of this.

We note that the CBRE/Mersea planning application for the IGS assumed that the “flagship project” Ipswich – Transport Fit for the 21<sup>st</sup> Century (renamed Travel Ipswich) would reduce dependency on car by 15%, whilst the Crest application assumed 20% reduction for work, business and other activities. It is clear the current network is completely UNFIT for the 21<sup>st</sup> Century and without substantial additional investment than that proposed it will remain this way.

Despite the Cross-Boundary Water Cycle Study report<sup>27</sup> there remains a lack of understanding and detail on what new additional sewage infrastructure will be required or evidence that the sewage infrastructure required for the IGS can be delivered despite first requesting this almost 10 years ago. Anglian Water’s proposed strategy to upsize 330 metres length of sewer along Valley Road and provide 550 cubic metres of storage off-line storage under Valley Road solution was briefly mentioned in the outline planning application for the Mersea Homes outline planning application for Land To South Of Railway Line, Westerfield Road IP/14/00638/OUTFL. There is still no agreed solution despite the two IGS outline applications being approved in February 2020. We note that IBC has stipulated that “Prior to the submission of the first Reserved Matters application a Site Wide Foul and Surface Water Drainage Strategy which covers the entire development site.”

If sewage infrastructure cannot be provided at the right time and at the right price for the IGS (as a whole) then the IGS cannot be delivered in accordance with the Plan. The implications of the construction of new sewage infrastructure on Ipswich need to be considered as part of the CS. For instance, providing a 550cubic metres sewage storage tank under Valley Road. will require its closure for many months and have a major detrimental impact on traffic and air quality in Ipswich. Sewage infrastructure requirements urgently need to be considered in Policy CS10 and included in the Infrastructure Table 8b. In our view, all off-line sewage storage should be provided on the IGS site to minimise traffic impacts and prevent the worsening of Air Quality in areas already exceeding legal limits in Ipswich.

The effectiveness of the CS to deliver both employment and homes growth including the IGS could be seriously undermined by the ongoing failure to properly assess the cumulative requirement of Ipswich for wastewater infrastructure over the CS period and plan for its provision. This remains a major failing of the CS making it unsound. We note that improvements to sewage infrastructure has been included in ISPA2 and it also needs to be included in relation to the IGS.

The potential impact of Sizewell C on the IGS and the CS has not been assessed in any form of sensitivity analysis. We have previously raised concerns of the impacts of increased rail freight for Sizewell C on the Ipswich – Westerfield stretch of the rail-line regarding air pollution, noise, operation of Westerfield level crossing and the proposed pedestrian bridge, which have been ignored. In its response to the latest consultation on Sizewell C<sup>28</sup>, we are pleased to see that IBC now shares these concerns, but still fails to assess the potential impacts in relation to the IGS and the CS. The potential impacts of Sizewell C as raised by IBC in its consultation response needs to be assessed in relation to the soundness of the CS preferred options through sensitivity analysis prior to a decision being made on whether it proceeds.

We believe the Council’s estimate requirement for increased retail space in Ipswich town centre remains flawed and question the need to allocate part of the Westgate site and the Mint Quarter for retail. We have always argued that Ipswich Borough Council has been over-estimating retail demand (as with previous undeliverable homes and employment targets). We believe that less retail space

27 [https://www.ipswich.gov.uk/sites/default/files/cross-boundary-water-cycle-study\\_jan\\_2019.pdf](https://www.ipswich.gov.uk/sites/default/files/cross-boundary-water-cycle-study_jan_2019.pdf)

28 <https://democracy.ipswich.gov.uk/documents/s23982/Item%2011%20Appendix%202%20Sizewell%20C%20Stage%203%20consultation%20IBC%20proposed%20response.pdf>

will be required in future and that some of it should be reallocated for housing in preference to of green space at the northern end of Humber Doucy Lane and Tuddenham Road. As mentioned above we believe there will be less land required for car parking in and around the town centre and that this land should also be reallocated for housing ahead of the Humber Doucy Lane green space for the CS to be sound.

### **Policy CS16 Green Infrastructure, Sport and Recreation**

The proposed allocation of land for housing at the northern end of Humber Doucy Lane and Tuddenham Road is in breach of Policy CS16, e.g. in relation to the protection and enhancement of green corridors. The CS is therefore unsound.

### **POLICY CS17: Delivering Infrastructure**

We remain concerned that the proposed development of the Ipswich Garden Suburb without improved road infrastructure will severely impact on traffic congestion and air quality and adversely affect the quality of life of residents.

At a strategic level, the Water Cycle Study concludes that, based on the predicted housing growth in IBC and SCDC, it is anticipated that no works/ upgrades to the existing water recycling centre (WRC) at Cliff Quay, other than those already planned by Anglian Water, are required. In terms of the Ipswich area, Anglian Water have the following three projects committed in their Water Recycling Long-Term Plan (2018)<sup>29</sup>

- Increased Water Recycling Centre Process Capacity - £12.3m cost – Scheduled for completion by 2032;
- Combined Sewage Overflow improvements - £11.96m cost – Scheduled for completion by 2027; and
- Increased Drainage Capacity through surface water management and upsizing (Defined Contingent Scheme) - £15.496m cost – Scheduled for completion by 2027.

This is clearly major infrastructure that is required for the delivery of the CS and should be included in the Infrastructure Table for the CS to be sound.

However, there is still no sewage infrastructure solution for the IGS or for the wider ISPA area despite it being a strategic priority (Policy ISPA2 Strategic Infrastructure Priorities i)). IBC needs to work far more closely with Anglian Water (and ISPA) to undertake a proper assessment of the cumulative homes and jobs expansion needs for strategic wastewater infrastructure in and around Ipswich to identify and cost key infrastructure deliverables. These need to be properly included in both CS Infrastructure Tables 8A and 8B as well. Without proper assessment and clear details of required sewage infrastructure to deliver the CS it is clearly unsound.

Please see our comments under Policy CS4 in relation to RAMSAR sites.

### **POLICY CS20: Key Transport Proposals**

It is worth noting that The Upper Orwell Crossings (the Wet Dock Crossings) will not proceed as there is insufficient funding (although new proposals for pedestrian crossings may be developed). SCC has also confirmed the Ipswich northern relief road will also not proceed. Without these major infrastructure projects, we believe increased congestion is likely to be severe and unacceptable without substantial investment in improving the existing road network, bus routes, rail services, dedicated cycle routes and major funding to support modal shift including funding to change the attitudes and behaviours of existing residents in relation to their transport modes. We believe that

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29 [https://www.anglianwater.co.uk/\\_assets/media/water-recycling-long-term-plan.pdf](https://www.anglianwater.co.uk/_assets/media/water-recycling-long-term-plan.pdf)

evidence needs to be provided to the Planning Inspector that substantial funding is available to deliver these improvements for the CS to be found to be sound.

We note that the traffic modelling does not assess the impacts of the potential construction of Sizewell C. Clearly this will have a major impact on traffic in Suffolk and Ipswich as recognised by IBC in its latest consultation response on Sizewell C proposals. As well as construction traffic itself, IBC agrees there will be an increase in the number of outward commuters from Ipswich/local areas and weekly commuters from further afield. The Transport assessment will need to be revised if Sizewell C proceeds.

We are pleased to see the WSP/ Suffolk County Council ISPA LOCAL PLAN MODELLING Methodology Report and the WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions – (January 2020) which updates previous January 2019 modelling work. However, we have major concerns with some of the key assumptions and outputs.

#### ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2

As mentioned above this shows the future highway schemes which have been included in the forecast model networks within Ipswich which are all assumed to be in place by 2026 (**we have added relevant references to IGS for clarity**).

1. Bixley Road / Heath Road / Foxhall Road Additional lane NB for Bixley Road / Additional lane SB for Heath Road
2. Nacton Road / Maryon Road Turn WB Nacton to two lanes, and EB Nacton to one lane
3. Upper Orwell Street Changed to one-way southbound from St Helen's Street
4. St Helen's Street / Bond Street Bus lane removal [**we question how this will improve bus services?**]
5. Ipswich Radial Corridor Route improvements - Felixstowe Road. Capacity increase to Felixstowe Road & Bixley Road arms of roundabout with A1156 Bucklesham Road. Capacity increase at Bixley Road / Ashdown Way junction
6. Ipswich Garden Suburb – Henley Gate Two signalised junctions included as part of site access onto Henley Road [**required as part of Crest Nicholson planning consent**]
7. Ipswich Garden Suburb – Fonnereau Priority controlled junction included on Westerfield Road in relation to access [**required as part of CBRE planning consent**]
8. Ipswich Garden Suburb – Red Hill Farm Two priority-controlled junctions included on Westerfield Road, north and south of Fonnereau access junction [**should be required as part of Red Hill planning consent when determined**]
9. A1214 Valley Road / Westerfield Road Increased capacity modelled on A1214 approaches to roundabout due to flares [**required before 599 homes occupied on Henley Gate site and 399 homes occupied on CBRE site as stated in the Decision Notices**]
10. A1214 Valley Road / Tuddenham Road Increased capacity modelled on A1214 approaches to roundabout due to flares [**required before occupation of 499 homes built on CBRE site as stated in the Decision Notice**]
11. Europa Way link road Link road between Sproughton Road and Bramford Road, extension of Europa Way with priority-controlled roundabouts
12. A1214 / Bell Lane Ban of right turn from A1214 onto Dr Watson Lane. Signalised junction of A1214 / Bell Lane changed to priority-controlled roundabout

As noted above this list excludes **improvements to the Henley Road/Dale Hall Lane junctions with Valley Road** which are required by SCC from Crest Nicholson before 299 home are occupied on its IGS site (as stated in the Decision Notice). We note that the IGS Highways projects are not secured through S106 Agreements but will be provided by the Developers.

It is not clear whether these projects will be funded separately by SCC outside of the Transport

Mitigation Programme or will be funded as part of the Transport Mitigation programme budget. It is unclear what completion dates for these infrastructure projects has been assumed in the modelling work and whether these assumptions are realistic and consistent with the trigger points placed on the IGS developers. Evidence needs to be provided of how each infrastructure project is intended to be funded and when it needs to be completed (as assumed in the modelling work). Currently there is too much ambiguity around these assumptions. We are especially concerned that A1214 junctions' improvements will not have been delivered by 2026 as assumed in the model. Without evidence that funding is available to deliver these 13 projects at the required time the CS is unsound.

As previously mentioned, these projects need to be included in the Infrastructure Tables. If any of the projects are not delivered by the required dates (which need to be identified in the modelling work so they can be tested to be sound) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needs to be provided to the Planning Inspector that funding is in place for these schemes compatible with the required delivery dates which need to be specified.

We note that rail freight from Felixstowe Docks is planned to increase by 50% and the number of trains by 30% with the upgrade of the rail line to Ipswich. This will result in a major increase in the number of closures of Westerfield level crossing and for a longer duration. Westerfield Road is the main access route to the IGS developments (other than the Henley Gate/Crest Nicholson development). Therefore, IBC needs to provide evidence that the SCC modelling assessment has included the impact of the increased closure frequency of Westerfield Road level crossing on traffic for the CS to be sound.

The following Tables show the trip generation reductions assumed in the modelling work, if these are not achieved the modelling is essentially unsound as will be the CS, as the transport network will not be able to cope with the traffic.

Table 5-1 – Trip generation reductions applied to existing road users

| Trip type     | 0-2.5km | 2.5km-8.5km | 8.5km+ |
|---------------|---------|-------------|--------|
| Urban-urban   | 30.00%  | 15.00%      | 5.00%  |
| Urban-rural   | 5.00%   | 5.00%       | 5.00%  |
| / rural-urban |         |             |        |
| Rural-rural   | 0.00%   | 0.00%       | 0.00%  |

Table 5-2 - Trip generation reductions applied to development trip generations

| Land Use Type | Development Type | Small  | Medium | Large               |
|---------------|------------------|--------|--------|---------------------|
| Residential   | Town Centre      | 10.00% | 12.50% | 0.00% <sup>30</sup> |
| Residential   | Urban            | 5.00%  | 10.00% | 10.00%              |
| Residential   | Rural            | 2.00%  | 2.00%  | 2.00%               |
| Employment    | Town Centre      | 15.00% | 20.00% | 20.00%              |
| Employment    | Urban            | 10.00% | 15.00% | 15.00%              |
| Employment    | Rural            | 3.00%  | 3.00%  | 3.00%               |

We note that “For any development from which trip rates and trip generation was determined from an existing Transport Assessment (i.e. greater than 500 dwellings / jobs), no trip generation reduction was applied as it was assumed a shift to sustainable travel was already accounted for within the Transport Assessment”. We agree with this approach to prevent double counting.

We note that the assumed modal shift rates for the Crest Nicholson and CBRE/Mersea developments in their approved planning applications were 20% (from work, business and other activities, and 30%

<sup>30</sup> 0% as there are no such developments

for travel to the secondary school) and 15% respectively.

Table 6-4 - 2026 Reduction in existing car trips

| Sector          | ID  | AM 2026 |      | PM 2026 |      |
|-----------------|-----|---------|------|---------|------|
|                 |     | Origin  | Dest | Origin  | Dest |
|                 | All | -9%     | -9%  | -10%    | -10% |
| Ipswich Central | 800 | -12%    | -15% | -15%    | -15% |
| Ipswich NW      | 801 | -13%    | -13% | -13%    | -14% |
| Ipswich NE      | 802 | -17%    | -17% | -17%    | -17% |
| Ipswich SE      | 803 | -15%    | -15% | -15%    | -16% |
| Ipswich SW      | 804 | -17%    | -14% | -15%    | -14% |

We note that the reduction in 2036 is very similar.

Tables 6-6 to 6-9 show reduction in trips from new road users for 2way trips in Ipswich these are

- 12% AM 2026
- 13% PM 2026
- 11% AN 2036
- 12% PM 2036

In Section 6.4 TOTAL TRIP MATRIX REDUCTION Tables 6-10 to 6-17 provides a comparison by vehicle type for the increase in overall county wide traffic for the various 2026/2036 AM/PM assignments with and without demand adjustment compared to the 2016 base. This information needs to be presented for Ipswich in order to properly assess the impacts of the CS and the feasibility of modal shift by vehicle type for Ipswich.

#### WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions January 2020

The Demand Reduction Impact for Ipswich is reported in Tables 7 - 14 as follows:

- 28% Reduction in PCU. Hours Delay (AM 2026) – SCC Highway
- 29% Reduction in PCU. Hours Delay (AM 2026) - SCC Highway / SRN interface
- 26% Reduction in PCU. Hours Delay (PM 2026) – SCC Highway
- 23% Reduction in PCU. Hours Delay (PM 2026) - SCC Highway / SRN interface
- 28% Reduction in PCU. Hours Delay (AM 2036) – SCC Highway
- 7% Reduction in PCU. Hours Delay (AM 2036) - SCC Highway / SRN interface
- 30% Reduction in PCU. Hours Delay (PM 2036) – SCC Highway
- 22% Reduction in PCU. Hours Delay (PM 2036) - SCC Highway / SRN interface

These are clearly substantial reductions but there has been no scenario analysis or assessment of how realistic these assumptions and demand reduction impacts are. We believe this level of reduction will be extremely difficult to achieve and that evidence is required to verify this for the CS to be sound.

The AM Peak is defined as 08.00-09.00 and the PM Peak as 17.00-18.00 but road users already experience congestion either side of these times and also around 15.00-16.00 in certain parts of Ipswich due to school traffic/use of pedestrian crossings etc. Experience shows that there are signs of the evening peak running from 15.00-18.30 at certain junctions and road links, e.g. the A1214, to varying degrees. It is not clear how the transport modelling considers the implication of this and the impact of congestion outside of the peak times, this needs to be explored further for the CS to be found sound with regard to Transport. It is particularly important with regard to the potential for road users to alter their journey patterns outside of the model's peak times.

Tables 15, 17, 19 and 21 for SCC Highway in Ipswich including the demand adjustments show

|                                                                  |
|------------------------------------------------------------------|
| 5 Junctions with overall V/C ratio of 85%+ (AM Peak) in 2026     |
| 12 Over-capacity links with V/C ratio of 100%+ (AM Peak) in 2026 |
| 11 Junctions with overall V/C ratio of 85%+ (AM Peak) in 2036    |
| 42 Over-capacity links with V/C ratio of 100%+ (AM Peak) in 2036 |
| 2 Junctions with overall V/C ratio of 85%+ (PM Peak) in 2026     |
| 9 Over-capacity links with V/C ratio of 100%+ (PM Peak) in 2026  |
| 12 Junctions with overall V/C ratio of 85%+ (PM Peak) in 2036    |
| 44 Over-capacity links with V/C ratio of 100%+ (PM Peak) in 2036 |

Previous modelling (for the IGS planning applications) has shown that many junctions and links in Ipswich are already operating at/near capacity at peak times and will continue to get worse without the 15% assumed modal shift. Clearly it will be impossible to achieve 15% modal shift in Ipswich by 2023 (for example) especially as there are no current modal shift projects running in Ipswich.

Modelling work needs to show how congested Ipswich roads will be with the additional growth before 2026 with realistic, evidence-based levels of achievable modal shift. By applying a 15% modal shift reduction for the only years modelled, the modelling is hiding the fact that Ipswich roads are already heavily congested with many roads at capacity. There is no evidence that the CS is sound in relation to transport proposals in the years up to 2026.

We note that the Results Summaries are only provided with the full demand adjustments without a comparison with zero adjustment (or any levels in between). The impact of additional traffic either side of the AM and PM peaks also needs to be assessed for the CS to be found to be sound.

Section 3.9 IPSWICH RESULTS SUMMARY show that even with the high levels of modal shift and new infrastructure many junctions will be unacceptably congested. What the modelling does not show is that these junctions are ALREADY at or near capacity.

3.9.1. Several of the A1214 corridor junctions operate with an overall V/C greater than 85%.

- A1214 / Dale Hill Lane – approaching capacity in AM/PM peaks in 2036. [Although not stated we also note that the modelling shows this junction is approaching capacity in 2026.]
- A1214 / Henley Road –approaching capacity in 2036 AM/PM.
- A1214 / Westerfield Road – approaching capacity in 2036 AM/PM peaks.
- A1214 / Tuddenham Road – approaching capacity in AM peak in 2036.
- A1214 / Rushmere Road – approaching capacity 2036 AM/PM peaks.

3.9.2. V/C results show congestion in the AM and PM peak on Key Street/College St and St Helens Street / Old Foundry Road / Crown Street corridors in Ipswich town centre.

Figures 15 and 16 also illustrate the many links that reach capacity, most notably on most of the A1214 from the hospital to Bramford Rd and on surrounding roads most notably around the Ipswich Garden Suburb. Further modelling of these junctions and links at capacity at Peak times is required to assess the impacts throughout the day. If they remain congested for long periods, then clearly the CS cannot be found to be sound with regard to Transport and Air Quality.

We repeat our concerns that the modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads such as Elsmere Rd and Dale Hall Lane as well as Park Rd, which are not designed for heavy traffic and have not been included in Air Quality Assessments. It is obvious that in 2026 air quality will be worsened on these roads, which is in breach of the CS and therefore unsound. We note that this level of excessive congestion is forecast even if high modal; shift rates are achieved etc.

The level of detail of the results provided in this report and published on the IBC website is far less than in the previous 2019 report and as Appendices A-C have not been included in the Evidence Base. These Appendices should be made available publicly prior to the Inspectors examination for analysis and to inform the proceedings.

4.4 IPSWICH MODELLING RESULTS states “4.4.1. Ipswich is highlighted as the location which benefits the most from the ISPA demand adjustments which have been applied. Ipswich experiences the highest proportional decrease in PCU Delay hours and reduction of junctions which show overall V/C issues. 4.4.2. Despite the significant benefits of the demand reductions, there are still various junction approaches along the A1214 corridor around Ipswich are shown to be over or close to capacity in both 2026 and 2036. Junctions in and around the Star Lane gyratory are shown to have capacity issues in both forecast years. Other junctions which show overall capacity issues include Nacton Road / Landseer Road and the St Augustine roundabout (Bucklesham Road / Felixstowe Road).” IBC has not provided any evidence how these issues will be resolved and without doing so the CS is not sound.

The Traffic modelling clearly needs to show in which year these junctions/routes reach these levels of congestion in order to plan properly for the delivery of the CS. From the results it is clear major new traffic infrastructure is required to resolve congestion on these routes and/or junctions in addition to those 12 projects already identified by SCC and assumed to be implemented.

We note that 4.7 SUMMARY 4.7.1. states “*The modelling detailed within this report is considered to be a robust basis which enables each of the LPAs to be able to test the transport impacts of the proposed housing and job growth within their respective emerging Local Plans.*” We agree that the modelling does test the impacts but do not believe that the modelling work is sufficiently robust to demonstrate that the CS is sound. We note that SCC does not go as far as saying that the CS policies in relation to accessibility and Transport are sound. In our view they are not sound, and IBC needs to provide further robust evidence that they are.

We also note that the traffic modelling excludes any construction and trades traffic involved with any of the new developments and consequently is not sound. Given the scale of development planned in and around Ipswich over the lifetime of the Plan, volumes of construction-related traffic are likely to have a material effect. This is particularly relevant to the roads around the IGS where the bulk of construction-related traffic will result given the proposed 3,500 homes and associated developments. The traffic modelling needs to include all traffic associated with the construction of the proposed new developments in the modelling work to be sound. In Ipswich, the traffic modelling also needs to include the impacts of any major sewage infrastructure works required for the new development, for instance Anglian Water’s proposed strategy is to upsize 330 metres length of sewer along Valley Road and provide 550 cubic metres of storage off-line storage under Valley Rd, which will require its closure for many months.

If this required traffic infrastructure cannot be delivered in a timely and effective manner before proposed development, then such development cannot be allowed to proceed as it would lead to severe congestion. A mechanism needs to be included in the CS to ensure that this cannot be allowed to happen for it to be sound.

POLICY CS20: KEY TRANSPORT PROPOSALS states that “*The menu of potential measures is set out in the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area (ISPA). A detailed action plan will be identified through the ISPA Board. Transport mitigation measures will be funded through developer contributions, Local Transport Plan funding, New Anglia Local Enterprise Partnership funding, the Highways England capital funding programme and bidding for other relevant funds.*” This is somewhat misleading as the Mitigation Strategy includes an Implementation Programme (admittedly one that lacks detail and proper cost assessment) which requires substantial funding, including from ISPA authorities, to deliver the required levels of modal shift to deliver Policy CS20 Transport.

Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area, August 2019

We are disappointed that the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area, August 2019<sup>31</sup>, clearly a key document, has not been included from the IBC New Evidence database. As we have only recently come across the document, we have not had sufficient opportunity to examine it in detail prior to the consultation deadline. We believe it is a key document for the Planning Inspector to consider in relation to the soundness of the Transport (and air quality) related aspects of the CS and should be assessed accordingly.

This includes an Implementation Programme for Phase 1 to 2026 with measures up to 2036 to be confirmed. SCC states “*It is anticipated that the phase 2 costs are likely to be greater than phase 1 as these will include linked roads and junctions within the town’s network*”.

Paragraphs 12.18.1 & 2. state that “*The focus of the implementation programme is to deliver mitigation within Ipswich to address the impact of cumulative growth identified in the ISPA planning authorities’ local plans. Recognising that this work will support the Local Transport Plan strategy for Ipswich.*” and “*Modal shift has been identified as the mechanism to mitigate the impacts of this growth. Trip rate adjustments were made within the SCTM model assessment to reflect a reasonable level of modal shift. This approach to trip reduction results, broadly, in a 9% shift to the background traffic and a 7% reduction to the new trips. The implementation programme focuses on measures that will deliver this level of modal shift*”.

However, the modelling work assumes reductions in Ipswich of

- around 15% (Table 6-4) in 2026 in existing car trips (with similar levels in 2036), and
- -12% AM 2026, -13% PM 2026, -11% AM 2036, -12% PM 2036 reduction in trips from new road users for 2way trips in Ipswich (Tables 6-6 to 6-9)

This level of modal shift seems to apply to ISPA as a whole whereas a far greater reduction is required for Ipswich. It is not clear that the full costs of this have been factored in. We question whether the proposed Implementation programme is sufficient to deliver the level of modal shift required in Ipswich assumed in the modelling work to deliver the CS and whether the CS is sound with regards to Transport (and hence air quality).

The evidence provided in Chapter 5 of the achievable levels of modal shift show that the required levels of modal shift for Ipswich are massively higher than the evidence base suggests is achievable or has ever been realised in the UK before. We note that the 2010 Sustrans Smarter Choices Project for Ipswich engaged with 12,000 households in a two-year period at a cost of £474,098. Overall it achieved a 11% car with single driver trip modal shift, but this was not sustained due to the lack of long-term engagement (Paragraph 5.2.13). It is important to understand that these levels of modal shift were achieved in summer months and there was no assessment of the levels in winter, when the number of cyclists reduces due to dark mornings/evenings and inclement weather. As 12,000 households is a sizeable proportion of total Ipswich households, this will make the modal shift targets even harder to achieve as many households will already have been targeted to change their mode of travel.

There are several reasons why these higher levels of modal shift are unlikely to be achieved in Ipswich – some of which are not specific to Ipswich. For example, the assumptions fail to consider that certain categories of workers cannot work from home and will need to use vehicles to in order to work most notably Tradespeople who use tools and carry equipment such as

31 <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/ISPA-Transport-Mitigation-v13F.pdf>

builders/constructors, gas & water engineers, painters, electricians, kitchen & bathroom fitters, tilers, roofers, gardeners, cleaners. The majority of these invariably travel at peak times. Another example is the growing numbers of care workers who support people to live in their homes. Unless SCC changes its school's policy in relation to choice, many parents will continue to use a vehicle to take and pick up their children from school, especially if parents also work.

Modal shift assumptions also fail to recognise the physical barriers within the town to cycling that have been identified by SCC in its draft LCWIP namely the hills, rail lines and river. Beyond the central core, routes travel uphill to the suburbs. The rail lines restrict route options to the south west of the town and it also severs routes to the north and east. In addition, the river limits north east - south west movements. In particular, many people will struggle to cycle up the steep hills out of Ipswich town. IBC needs to provide the Planning Inspector with sufficient evidence that these barriers can be overcome for the CS to be sound.

It is well known that the number of cyclists reduces in winter due to dark mornings/evenings and inclement weather, yet the modelling assumes the same levels of modal shift will apply throughout the year, which is clearly not going to happen. The modelling and modal shift assumptions are therefore unsound in this respect. IBC needs to provide evidence that extremely high levels of modal shift that have been modelled can be delivered in Ipswich by 2026 for the CS to be sound in respect of Transport and Air Quality.

Paragraph 5.4.5 states that “*Analysis has been undertaken to inform the Suffolk County Council’s Local Cycling and Walking Infrastructure Plan (LCWIP) using DfT approved tools the Walking Route Audit Tool (WRAT) and the Cycling Level of Service (CLoS). This has identified some key links for improvement.*” We are disappointed that this document has also not been added by IBC to its Evidence Base. Please refer to our earlier comments on this.

In order to increase the number of cyclists, people have to feel confident enough and safe to cycle. Yet there is no mention of developing and delivering free road-cycling courses based on national standards<sup>32</sup>. Without these it will be impossible to increase the number of cyclists to required levels even if there were substantial improvements in safer, dedicated cycling infrastructure.

Paragraph 5.5.1 states that “*Work on the walking and cycling strategy is ongoing. To date schemes have been identified to address existing gaps in the network. However, as part of the ISPA mitigation strategy implementation programme a review of the potential to introduce more ambitious measures would be undertaken, with focus on improving sustainable access to areas of employment.*” There does not appear to be much commitment to providing funding to delivering improved cycling infrastructure. Evidence is required that funding will be available for improved cycling infrastructure, training etc otherwise modal shift targets will not be achieved and the CS is therefore unsound.

In the Infrastructure chapter, Paragraph 9.24.1. states “*The provision of infrastructure needs to be considered for all workstreams in the transport mitigation implementation programme. It is intended that most improvements will manage capacity rather than significantly increase capacity due to physical constraints on the Ipswich highway network.*” This statement gives no confidence that there will be much investment in improving cycling infrastructure to increase capacity. As mentioned earlier it is not clear what infrastructure the Transport Mitigation Strategy. This needs to be made clear to the Planning Inspector for the CS to be sound.

The estimated cost of delivery of mitigation of the lower level of modal shift for ISPA as a whole to

32 □

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/769891/national-standard-cycling.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/769891/national-standard-cycling.pdf)

2026, phase 1, is summarised in Table 24, copied below. It is worth noting that modal shift does not happen overnight, as it requires a major change in behaviour, but over a period of many years – this does not seem to have been factored in. To have even the remotest of chances of achieving the extremely high modal shift levels required then investment needs to be made now, especially in infrastructure projects which obviously include planning and build times on top of the length of time to deliver behavioural change. The long lead times of infrastructure based behavioural change projects appears not to have been factored in.

Table 24 – Phase 1 cost estimate

Workstream Range of costs to 2026

|                                         |            |            |
|-----------------------------------------|------------|------------|
| Monitoring                              | 500,000    | 700,000    |
| Smarter Choices & QBP project team      | 2,300,000  | 2,500,000  |
| Incentives, including bus route subsidy | 4,440,000  | 5,000,000  |
| Parking review                          | 100,000    | 200,000    |
| Infrastructure                          | 16,000,000 | 20,000,000 |
| Technology                              | incl       | tbc        |
| Total                                   | 23,340,000 | 28,400,000 |

We note that Technology costs remain to be confirmed. SCC state “*The use of technology will be considered for all mitigation measures and improvements, especially where it will provide a cost-effective mechanism to deliver the implementation programme and improve modal shift.*” It is clear that Technology costs are likely to be significant. These urgently need to be costed with funding agreed by the relevant authorities for the CS to be found to be sound.

The apportionment of costs by Local Planning Authority is defined in Table 22 below:

Table 22: Trips In/Out of Ipswich

| LPA                              | % trips |
|----------------------------------|---------|
| Ipswich Borough Council          | 45      |
| Suffolk Coastal District Council | 28      |
| Babergh District Council         | 14      |
| Mid Suffolk District Council     | 13      |

Chapter 11 Funding sources does not inspire confidence that sufficient funding is available, and that Authorities have committed to providing their share. We note that IBC’s FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS allocates no money at all for modal shift measures. Evidence needs to be provided that sufficient funding is guaranteed, and that each Authority has committed to providing its share of the required funding to deliver the proposed 9% shift to the background traffic and 7% reduction to the new trips. Although this is still far lower than the approximate 15% and 12% reductions the modelling work assumes will happen in Ipswich.

For the CS to be sound an Implementation Programme needs to be included in the CS costed and agreed to be funded by all Authorities that delivers the higher levels of modal shift required to be achieved in Ipswich by 2026. Assurances for funding of the required Phase 2 measures from authorities should also be required for the CS to be sound.

As we have previously stated, there is a single assumption that these levels of modal shift will be delivered, without any scenario modelling e.g. at 25%, 50% and 75% success rates. How will IBC deliver the CS if these unprecedented levels of modal shift are not achieved? Currently Ipswich Borough Council has not provided sufficient evidence that the required levels of modal shift required in Ipswich are achievable or that it has the funding in place to deliver them for the CS to be found to be sound.

**Parliamentary Transport Committee report Active travel: increasing levels of walking and cycling in England in July 2019<sup>33</sup>.**

Section 32 recommends that “any revised Cycling and Walking Investment Strategy include targets for getting people to switch from driving to active travel. These targets should be based on the number of journeys made by car, foot or bicycle for journeys of less than 1, 2, 5 and 10 miles.” The Government should set modal shift targets for 2025 and 2040, to align with the targets it sets for increasing levels of walking and cycling. These should be at a level that ensures England meets—at the very least—the Committee on Climate Change’s assumption that there will be a 10% transport modal shift by 2050. Local authorities should be encouraged to set local targets for modal shift as part of their Local Cycling and Walking Infrastructure Plans”. Clearly IBC needs to include modal shift targets in the CS for it to be sound. Whilst we believe that modal switch will be easier in a town than across the UK, it is unbelievable to expect that 15% modal shift can be achieved in 2026. If the Committee on Climate Change is assuming that 10% modal shift targets (over 30 years) are appropriate for the UK in 2050, IBC needs to provide the evidence that it can achieve over 50% higher modal shift in just 6 years (80% lower time frame)? Where is the evidence that IBC can deliver these far higher levels of modal shift in a substantially shorter time frame for the CS to be sound?

**Suffolk's Local Transport Plan 2011 - 2031**

We also note that SCC's Suffolk's Local Transport Plan 2011 - 2031<sup>34</sup> seems to be the most recent version available. This is split into two parts and outlines SCC's objectives for transport:

- Suffolk's Local Transport Plan - Part 1 (PDF, 1MB) is a 20-year strategy that highlights the council's long-term ambitions for the transport network.
- Suffolk's Local Transport Plan - Part 2 (PDF, 5MB) is a four-year implementation plan indicating how the council are proposing to address the issues identified within the longer-term transport strategy.

There is no updated version of this in the IBC Local Plan Evidence Base or on the SCC website. A publicly available current Implementation Plan showing how SCC will provide funding to address the key transport issues and the levels of modal shift required to deliver Ipswich Borough Council's CS does not appear to exist. Without this Ipswich Borough Council is unable to provide sufficient evidence that it can deliver Policy CS20 and therefore the CS is unsound.

As previously stated we are not aware of any major improvements to existing cycle routes on the existing road network in Ipswich since that approval of the current CS. IBC needs to provide evidence of what improvements have been made and are planned for existing road network in order to deliver the high rates of modal shift (and lower trip rates) that the traffic modelling uses. Without the provision of supporting evidence lower modal shift rates and higher trip rates should be adopted in the modelling work.

33 <https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/1487/1487.pdf>

34 <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>

## **Paragraph 8.220**

There is clear evidence that poor air quality does detriment on health. This needs to be amended to read "Air Quality Management Areas are designated in areas where poor air quality will have an effect on people's health". Failure to recognise this undermines the soundness of the Plan.

## **Policy DM1 Sustainable Construction**

At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. Policy DM1 needs to be updated to include this commitment and then strengthened to ensure that the CS delivers carbon neutrality of the Council by 2030 for it to be sound. New build homes built by the Council will have to be zero carbon for this to happen and the Council should require other developers to do likewise. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

## **Policy DM2 Decentralised Renewable or Low Carbon Energy**

This policy also needs to be updated and strengthened to incorporate the declaration of a Climate Emergency. The energy requirements of new build homes built by the Council will have to be zero carbon for the Council to become carbon neutral by 2030. The Council should require other developers to do likewise.

## **Policy DM3 Air Quality**

We support the strengthening of DM3 from the previous draft version of the Plan, which was hopelessly weak and ineffective. However there remain major flaws in IBC's approach to improving air quality which mean the CS is unsound.

The Core Strategy Adopted December 2011 Paragraph 9.95 states "*With the levels of growth proposed for the town coupled with the fact the town already has three Air Quality Management Areas it is felt essential that air quality impacts and mitigations are fully addressed.*" Paragraph 8.201 of the current CS states "*There are, in addition, four Air Quality Management Areas (AQMAs) within the central area of Ipswich, as a result of pollutants from road traffic.*" There are now five AQMAs in Ipswich. This increase from three to five AQMAs is simply not acceptable given the strong clear evidence of the detrimental impacts on human health. Clearly IBC is not doing enough to improve air quality and must do more for the CS to be sound.

NPPF 181 suggests planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. The CS needs to make a clear commitment to improving air quality in Ipswich and compliance with legally binding air pollution targets for the CS to be sound.

In relation to DM3 Topic Paper: Air Quality, Transport and Green Infrastructure Paragraph 20 states that "*the Council has given consideration to the Government's Clean Air Strategy 2019 and exercised its duty under the Environment Act 1995, and DEFRA's Local Air Quality Management Policy Guidance LAQM.PG16, (4) with the preparation of a draft Air Quality Action Plan (AQAP) and this too has been through a phase of public consultation leading to its (likely) adoption in 2019*". We note that this has now been adopted without taking any notice of most of the criticisms made by consultees.

Paragraph 51 states “*The Local Plan Review Preferred Options sit alongside the Council’s draft Air Quality Action Plan which looks beyond planning at other measures including corporate measures that can be put in place to improve air quality. The Council’s AQ action Plan will be scrutinised by DEFRA, having been subject to public consultation in late 2018.*” IBC needs to confirm that this has happened and provide the results of the examination to help demonstrate the CS is sound.

Defra’s template guidelines for the Air Quality Action Plan require firm, time bounded actions that **will deliver** a reduction in air pollution in the five AQMAs. However, IBC fails to follow Government’s guidelines and chooses to water down Government requirements. Ipswich Borough Council fails to make the required firm commitment in its AQAP to delivering any reduction in air pollution nor does it set out when it will deliver actual improvements in air quality or specifically how it will do this. In our opinion the AQAP is therefore non-compliant with Government requirements and shows a lack of commitment from IBC to improving air quality in Ipswich in breach of its legal duty to do so. This is clearly to the detriment of residents who consequently suffer from higher incidents of poor health and respiratory disease especially in and around the AQMAs. The HRA fails to take into account the non-compliance of the AQAP with Government guidelines.

The WSP Source Apportionment Study (dated June 2018) supported IBC’s AQAP. However, this study is flawed and under-estimates NOx emission levels.

1. The Source Apportionment Study was undertaken for AQMA No.2 (the junction of Crown Street with Fonnereau Road, St. Margaret’s Street and St. Margaret’s Plain) and AQMA No.5 (Matthews Street/Norwich Road between the Civic Drive roundabout and Bramford Road).
2. ANPR cameras were deployed at two roadside count points located on the A1156 in Ipswich to gather detailed information on the local vehicle fleet. Measurements were conducted over a twelve-hour period each day starting at 07:00 on 27th (Friday), 28th (Saturday) and 30th (Monday) April 2018. One of the two ANPRs (in AQMA2) failed at 14.00 Monday (missing the Monday evening peak).
3. Speeds were only measured for the Friday and Saturday and used in the calculation of the vehicle NOx emission rates for these two days. The averages of the hourly measurements made on both days were used to calculate the vehicle NOx emission rates for the 30th April. The report states that traffic speeds were higher on Saturday (somewhat obviously). Other UK traffic flow studies show that Friday traffic volumes in general tend to be lower than other weekdays (as more people like to work from home on a Friday and some sectors tail off ahead of the weekend). Friday evening peak traffic is also lower than other weekdays as people leave work earlier and there are less after-school activities and hence fewer associated traffic movements. We are dismayed that there was no speed measurement between Monday and Thursday, which would have given a more accurate representation of pollution levels. It is also worth noting that more vulnerable schoolchildren are mainly impacted on weekdays for obvious reasons.
4. The report states the obvious in that "Analysis of the NOx emissions shows that they were inversely proportional to vehicle speed, as shown in Figure 7. This means that lower vehicle speeds will give rise to higher emissions, for example during congested periods at peak rush hour time, in addition to the increase in emissions associated with increases in vehicle number." So, the report underestimates Monday's emissions (and hence Tues, Weds, Thurs) and thereby under-estimates what additional measures will be required.
5. At the end of the 2-day measuring period of the two pneumatic strips measuring speeds was found to be loose. The report acknowledges that "this may have caused inconsistencies in the traffic flows and/or directional assignment measured during the traffic survey" i.e. the results are unreliable and hence the report is further flawed.

We note that Paragraph 47 of the Topic Paper states that “Air Quality modelling was completed in 2016 in relation to locations identified for future development under the Ipswich Core Strategy and Policies Development Plan Document Review, and Ipswich Site Allocations and Policies (Incorporating

IP-One Area Action Plan) Development Plan Document (the Ipswich CS, 2017)". We believe that this work assumed the Upper Orwell Crossing project would proceed and as this has been cancelled is therefore obsolete. It excluded all emissions arising from construction including construction traffic and tradespeople journeys. It also failed to assess the multi-site build out of the IGS and air pollution levels in the early years of the IGS build. New Air Quality modelling work needs to address these issues and focus on air quality levels in the first 10 years of development, when they are likely to be at their highest levels (before European vehicle emission standards deliver expected emission reductions).

We note that there is no Air Quality assessment provided as part of this consultation, which is unacceptable (although they are planned). We reserve the right to comment on this when it is available and request that IBC notify and consult with us when this work has been released. Whilst we agree with the areas to be assessed identified in the WSP Screening Report January 2020, we disagree with just the two reference years of 2026 and 2036 being used and argue that an earlier year, such as 2023 (being the midpoint between 2020 and 2026. The reason is that by 2026 tighter vehicle emission standards should be delivering improvements and that it is the early years of the CS period when emissions could be at their most dangerous and greater action required to prevent premature deaths. It is completely pointless using 2036 when considering the 2035 (at the latest) ban on petrol, diesel and hybrid vehicles, which will obviously have a major impact many years before this date. We note that the screening assessment uses the SCTM traffic forecasts, which exclude any form of construction traffic. The air quality assessment needs to include emissions from construction traffic and construction otherwise the assessment and hence the CS will be unsound. We note that the SCTM assumes high levels of modal shift without sufficient evidence that this is achievable. Sensitivity testing of different rates of modal shift is therefore required in the assessment for it to be considered sound.

We support the revised draft Policy DM3 of the CS, which states that "Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan." This has not been done for the IGS development (see below) and needs to be undertaken as a priority before building works be allowed to commence. We also note Paragraph 9.3.5 states that "The AQA should also consider wider cumulative impacts on air quality arising from a number of smaller developments". In our view that the multi-site build out of the IGS needs to be assessed in a new AQA. The HRA fails to assess the non-compliance of the AQA for the IGS with DM3 and needs to assess this accordingly.

Paragraph 1.2 IBC's AQAP confirms the use of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments (Appendix 2). However, the IBC Planning Department is currently not implementing the Guidance in the way it needs to be in order to improve Air Quality in Ipswich. This is especially pertinent considering the proposed expansion of Ipswich detailed in the CS. This urgently needs to be corrected for the revised CS to be sound. When assessing the Planning Applications in relation to Land To South Of Railway Line, Westerfield Road IP/14/00638/OUTFL and Land to the North of the Railway Line and East of Henley Road 16/00608/OUT the Air Quality guidance was ignored in relation to Sections 6.22 and 6.23 (see Appendix 2). No Air Quality Assessment was undertaken for either application that assessed the impact of construction and construction traffic on Air Quality nor was there an Air Quality assessment carried out for the first year of occupation of any of the phased developments, when there will also be considerable construction traffic as well as substantial additional traffic from the new homes. This raises four key questions that need to be answered by IBC when assessing the soundness of the CS Preferred Options.

- Question 1 Why has the Council chosen to ignore the Guidelines it has adopted and decided not to assess the impact of emissions from construction and associated construction traffic on Air Quality for these IGS sites?

- Question 2 Why has the Council chosen to ignore the adopted Guidelines and chosen not to assess air quality emission for the first year of each phase (when there will also be emissions from the construction of other phases that are being built in parallel)?
- Question 3 How can the Council assess whether these developments “will compromise or render inoperative the measures within an Air Quality Action Plan, where the development affects an AQMA” as required by Section 6.22 of the guidelines?
- Question 4 How can IBC demonstrate compliance with Policy DM3 in the early years of the IGS development, when considering construction traffic and sewage infrastructure works?

In our view the IGS is non-compliant with Policy DM3.

This is particularly pertinent as much of the construction traffic will pass through AQMA 1 and 4 with tradespeople also travelling through AQMAs 2 and 5 as well. Consequently, IBC is currently failing to properly assess the impacts of the construction and related traffic from the IGS development in the early years of the build out on air quality in Ipswich. It has not assessed whether these developments will compromise the current version of the draft Plan, nor the Air Quality Action Plan.

We cannot find any air quality assessment in relation to rail transport or to shipping at the Port of Ipswich, with both forms of transport increasing. This is a major gap in the evidence base that risks rendering the CS unsound especially as ISPA plan to increased capacity on railway lines for freight and passenger traffic (Policy ISPA2 Strategic Infrastructure Priorities f)). AQ assessments are required for:

- The Port of Ipswich (which is included in the Screening assessment study area),
- the Ipswich Chord and Freight yard, where diesels regularly sit idling emitting pollutant clouds,
- additional freight to and from Port of Felixstowe (Felixstowe-Nuneaton upgrade), we note that rail freight is planned to increase by 50% and the number of trains by 30%, and
- additional freight in relation to the construction of Sizewell C.

We are not arguing against growth, but simply advocating the impacts of air quality need to be properly assessed so that mitigation action can be taken where required. Without this the CS is unsound.

The HRA also fails to consider train and shipping emissions, which need to be included in the HRA especially as shipping will clearly impact on the Orwell Estuary, which is part of a Special Protection Area (SPA) and Ramsar site. We note that the DfT Port Air Quality Strategy (under the Defra Clean Air Strategy , 14 January 2019) applies to ports with cargo greater than 1million tonnes, which would appear to include the Ipswich Strategic Harbour Authority.

We note that the Council failed to apply for any funding under the Clean Air Fund by the November 2018 deadline for projects that are to commence from March 2019. As the Council has no evidence basis or costings for any of its proposed projects in its AQAP, it will not be eligible for future Clean Air Funding. This clearly begs the question how will IBC fund the projects that it has identified in the AQAP as needed to reduce air pollution? We also note that IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS allocates no money at all for improving air quality despite being the responsible authority for doing so. IBC needs to provide evidence that it will be able to finance and deliver its AQAP for the CS to be sound.

## **DM8 Natural Environment**

Please see our comments under Policy CS4.

## **DM20: House in Multiple Occupation**

We support the new Policy 20 as a pragmatic and sensible response to an increasing issue in Ipswich.

## **DM21: Transport and Access in New Developments**

We strongly object to the removal of the reference to traffic capacity and rights of way in

- a. *not result in a severe adverse impact on rights of way or the local road network in respect of traffic capacity and highway safety;*

The references to “rights of way or the local road network in respect of traffic capacity” needs to be reinstated as walking and cycling rights of way should not be reduced and as traffic congestion is already a major problem in Ipswich and should not be negatively impacted on by local new developments. The proposed changes conflict with CS5 Improving Accessibility and renders the CS unsound. We support the change in relation to highway safety.

We support the requirement of

- b. *not result in a significant detrimental impact on air quality or an Air Quality Management Area and address the appropriate mitigation measures as required through policy DM3*

but note that the IGS development is currently non-compliant as it failed to assess the impacts of the development on air quality in accordance with DM3. A revised assessment of air quality impacts of the IGS is urgently required before building can commence and the revised CS can be found to be sound.

It remains unclear how ‘severe’ and ‘significant’ impacts are defined. These need to be clearly defined in the CS. In the case of air quality, there are maximum legal limits for particulates and nitrous oxides, and it would be appropriate for ‘significant’ to be defined as the legal limit.

## **Chapter 10 Implementation**

Tables 8A and 8B needs to include the required specific junction improvement projects, estimated cost and a date by which they are required to be delivered in accordance with the transport modelling assumptions for the CS to be sound.

Table 8A omits the technology costs that will be required to deliver as stated in Table 24 of the SCC Transport Mitigation Strategy. This needs to be included for the CS to be sound as modal shift targets will not be delivered without new technology.

Table 8A needs to clearly identify that substantial funding will be required for sustainable transport measures in Ipswich and infrastructure to support them after 2026 and that the level of funding will be greater than that required up to 2026 as identified in the SCC Mitigation Strategy.

The Link road through site IP029 via Europa Way from Bramford Road to Sproughton Road identified in Table 8A has been included in the SCC Modelling assumptions and therefore must be considered as a requirement. If not, the modelling is unsound and needs to be repeated without this link road. We note that in response to the creation of the Suffolk County Council taskforce to improve Ipswich traffic David Ellesmere is quoted in the East Anglian Daily Times as demanding “a new link road connecting Europa Way with Bramford Road to alleviate traffic pressures, and work to explore a new road link connecting London Road, Hadleigh Road and Sproughton Road”.

## **OBJECTIVE 5: Air quality**

We strongly object to the removal of the current Objective to improve Air Quality which in relation to the five AQMAs is a legally binding requirement. We also note that the Planning Inspector specifically requested the inclusion of this indicator in the last review of the current CS. The existing indicator of the “Number of recorded air quality exceedances.” Needs to be retained and reported on. We support the inclusion of an air quality objective but believe this should be to reduce air quality emissions to legally binding limits by a specified date for example within 3 years.

As mentioned previously. It is not clear what the 2004 levels are or how progress against these will be measured; 2004 emissions levels should be included in the CS for completeness so that the target is clear. For example, do 2004 measuring locations correspond with the current measuring locations and if not, how will IBC determine whether levels have returned to 2004? Furthermore, it is not clear when IBC aim to return to 2004 levels. This needs to be done as a matter of urgency and should not be left to 2036 as would be possible under the current Plan, by which time many more Ipswich residents will have died prematurely.

An Objective of “Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels” does not go far enough. Limiting this to an “aim” provides a massive caveat to the Objective. Also, how will the Council determine that EVERY development has contributed?

## **OBJECTIVE 6: Transport and connectivity**

Given the distinct lack of progress in cycling infrastructure an additional indicator is required to measure improvements, especially in relation to the development of new/improved comprehensive, integrated cycle routes.

As identified above, IBC needs to start taking more positive actions to Improve Accessibility as it is currently non-compliant with CS5. Closer scrutiny of IBCs approach to Improving Accessibility is clearly required and additional Objectives/measures are required to monitor and assess progress on Improving Accessibility in the CS to help ensure IBC comply with CS5 in future.

### **IPSWICH LOCAL PLAN REVIEW 2018 - 2036 INTERIM SUSTAINABILITY APPRAISAL REPORT Strategic Environmental Assessment and Sustainability Appraisal October 2019**

A key problem with the Sustainability Appraisal (SA), Habitats Assessment and Health Impact Assessment, are that they simply assume that the CS will be fully implemented and that full funding for all the measures identified in the CS will be secured. In particular, there is no evidence that IBC (in conjunction with SCC) can deliver the substantial improvements in walking, cycling and bus infrastructure, improved road infrastructure and the project required to deliver the unprecedented levels of modal shift required for the CS to be sound. IBC and SCC's track record in these areas is dire with no evidence provided by IBC that this will change. There has been an increase in AQMAs and traffic with little real improvement in cycling or walking infrastructure and a major deterioration in bus services e.g. the closure of the Norwich Rd Park and Ride Scheme and reduction in rural bus services into Ipswich. The failure of Travel Ipswich (Ipswich Fit for the 21<sup>st</sup> Century)to deliver modal shift and the Upper Orwell Crossings project illustrate the problems facing IBC.

In our opinion it is too early to fully comment on the Report for several reasons, including:

- No SA of IBCs non-compliance with Sections 6.22 and 6.23 of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments of the IGS proposed developments regarding construction traffic and assessment of the early years of the development.
- No SA of IBC's non-adherence to Government Guidelines for IBC's own Air Quality Action Plan in relation to the IGS and the Plan. No consideration that the CS does not comply with legally binding air quality targets.
- No SA of the air quality modelling/assessment of road traffic (as this has not been done yet).
- No SA of the omission of emissions from construction and traffic associated with construction of the IGS.
- No SA of the ability to meet the unprecedented levels of modal shift required for the CS to be sound (as identified in the transport modelling and SCC Transport Mitigation Strategy) and no assessment of what happens if the targets are not achieved.

- No SA of the lack of sewage infrastructure plan/proposals for the IGS and ISPA and SA of the environmental impacts of delivering new sewage infrastructure required for Ipswich, including emissions and impact of traffic congestion arising from the required foul water construction works.
- No SA of air quality or noise assessment in relation to rail transport most notably for the Ipswich Chord and Freight yard, where diesels regularly sit idling, emitting pollution and additional freight to and from Port of Felixstowe,
- No SA of the environmental impacts of the Port of Ipswich.
- No assessment of the potential impacts of increased freight traffic on the IGS pedestrian bridge and Westerfield rail crossing (including impacts on traffic delays).
- No SA of the decision to destroy the Green Rim by building homes on the Humber Doucy Lane part and re-designating it as Green Trails.
- The apparent lack of a full appraisal of the impacts on building on land at Humber Doucy Lane in the north east.
- No SA of the alternative of using land reserved for Retail and Car Parking in the town centre, which we believe is surplus to requirements, instead of building on Humber Doucy Lane.
- No SA of the omission of the incorporation of IBC's declaration of Climate Emergency into the Plan.

An updated SA is required to consider all these issues and consulted upon accordingly for the CS to be properly examined and progressed accordingly. Until the SA addresses these issues the CS cannot be deemed sound. We reserve the right to comment on the SA as it is developed.

### **Habitats Regulation Assessment (HRA)**

Please see our opening comments in relation to the Sustainability Appraisal, which apply to the Habitats Regulation Assessment.

The HRA is currently incomplete and needs to address the following impacts of :

1. The proposed re-designation of the Green Rim.
2. The new sewage infrastructure that will be required to deliver the housing and employment targets.
3. The required traffic infrastructure identified by the traffic modelling to improve the road network to allow the sustainable delivery of the CS (summarised above).
4. The non-compliance of the IGS AQA with DM3.
5. Emissions from rail and shipping.

If no such assessments are included in the HRA then the HRA needs to explain why they have been omitted.

IBC's response<sup>35</sup> to the Habitat Regulation Assessment (HRA) recommendations in relation to Paragraph 1.29 is not acceptable. This recommendation states "*In order to make ecological networks and wildlife sites capable of future resilience, there is a need for more wildlife sites, and that existing networks need to be bigger, better and more connected.*" The CS needs to be strengthened to ensure compliance with this recommendation especially as IBC's proposal to re-designate the Green Rim (which has not been assessed by the HRA) is clearly detrimental to this requirement.

It also needs to assess whether the lack of S106 payments for RAMs mitigation from the two IGS sites that received outline planning permission in February 2020 is acceptable as discussed earlier.

### **Health Impact Assessment**

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<sup>35</sup> [https://www.ipswich.gov.uk/sites/default/files/response\\_by\\_ibc\\_to\\_the\\_habitat\\_regulation\\_assessment\\_jan\\_2020\\_0.pdf](https://www.ipswich.gov.uk/sites/default/files/response_by_ibc_to_the_habitat_regulation_assessment_jan_2020_0.pdf)

Please see our opening comments in relation to the Sustainability Appraisal, which apply to the Habitats Regulation Assessment. The Health Impact Assessment fails to take into full account the removal of the Ipswich Green Rim, the non-compliance with legally binding air quality targets, emissions from construction, port and rail activities and the failure to include recognition of the Climate Emergency into the Plan.

Brian Samuel

Submitted on behalf of the Northern Fringe Protection Group<sup>36</sup>

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36 The Northern Fringe Protection Group (NFPG) is making this representation on behalf of its members and other residents who have authorised the NFPG to represent them. A list can be supplied on request.

## **Appendix 1 Evidence that the Green Rim should not be reclassified as Green Trails**

- Ipswich Local Plan November 1997

This makes specific reference to 9 green corridors (A-I) in Chapter 3. Paragraph 3.12 states “*These green spaces offer the opportunity to form corridors linking the inner parts of the Town with the surrounding countryside, visually and by providing access on foot or by cycle. These corridors are indicated on Plan No 1.*”

NE2 also states that “*The protection of the landscape quality and character of the countryside \*including the Area of Outstanding Natural Beauty (AONB) will be a prime consideration and proposals for irreversible development which is not required for the efficient operation of agriculture, forestry and recreation will not be permitted in the countryside as indicated on the Proposals Map unless there is an overriding case for a rural location.*”

It is clear it is the intention that the green corridors will provide access on foot or by cycle to the surrounding countryside and it is this countryside that was intended to form the green rim of Ipswich.

- Ipswich Core Strategy and Policies Development Plan Document December 2011

Chapter 7: The Key Diagram references (v) The green corridor and green rim approach to strategic green infrastructure (Policy CS16); The green rim almost completely covers the Ipswich Borough Council boundaries, which essentially reflects the countryside in the 1997 Proposals Map.

POLICY CS16: GREEN INFRASTRUCTURE, SPORT AND RECREATION Paragraph 8.175 states “*As the Borough grows, it is essential to protect, enhance and extend the network of open spaces, green corridors, and sports and recreation facilities. This is important in order to: allow people access to green space and nature; strengthen ecological networks that enable wildlife to migrate more easily around the town; link inner and outer parts of the Borough by providing walking and cycling routes;*”

*It will do this by [a number of means including]  
f. working with partners to improve green infrastructure provision and link radial green corridors with a publicly accessible green rim around Ipswich;*

It is clear the December 2011 Plan continues the concept of the green corridors providing walking and cycling routes to access the green rim and that the green rim was not intended for this purpose. We note that there remain 9 green corridors in the 2011 Plan as there were in the 1997 plan.

The green rim on the 2011 Key Diagram (pg 30) is very much larger than that in the current Key Diagram and clearly illustrates that the concept of the green rim is to protect the countryside on the perimeter of Ipswich Borough. It is also clear the Green Rim has been decimated beyond its original intention.

- Ipswich Core Strategy and Policies Development Plan Document February 2017

Diagram 3 of the Plan (pg 24) and the associated Plan 6

[https://www.ipswich.gov.uk/sites/default/files/plan\\_6\\_green\\_corridors\\_-\\_adopted\\_feb\\_2017.pdf](https://www.ipswich.gov.uk/sites/default/files/plan_6_green_corridors_-_adopted_feb_2017.pdf) shows that 9 green corridors remain and illustrates the green rim (which has shrunk from the previous Plan).

CS 16 states that “The Council will safeguard, protect and enhance biodiversity and the environment by working in partnership with others to ensure that our parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefitting the whole community. The Council will enhance and extend the ecological network and green corridors, open spaces, sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk. It will do this by:

g. working with partners to improve green infrastructure provision and link radial ecological networks and green corridors with a publicly accessible green rim around Ipswich;”

This continues the concept that it is the green corridors that provide the links to the green rim.

- Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, Suffolk Coastal District Council and Suffolk County Council  
Statement of Common Ground in relation to Strategic Cross Boundary Planning Matters in the Ipswich Strategic Planning Area Version 3 – December 2018

Section I Annex - Cross Boundary Infrastructure Requirements - Green Infrastructure pg 25 references the Infrastructure requirement for “Creation of ‘green rim’ around Ipswich” in accordance with the Update to the Haven Gateway Green Infrastructure Strategy for the Ipswich Policy Area (August 2015), Ipswich Borough Council Local Plan Review Preferred Options (November 2018) policy ISPA4 Cross Boundary Working to Deliver Sites and CS16 green Policies ISPA4 and SCLP12.24 require development to contribute to the creation of the ‘green rim’. This is clearly categorised as “Green Infrastructure” and not as “Transport Infrastructure”.

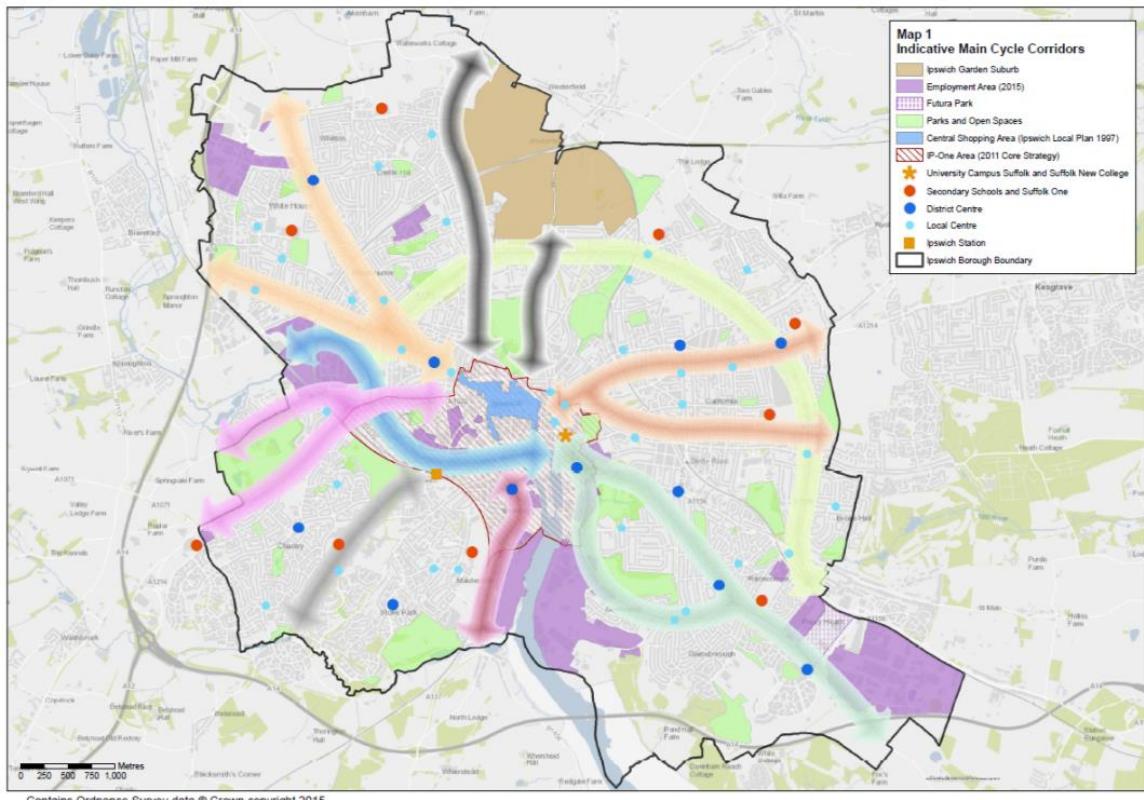
- Comparison of cycle routes and the proposed green trails in the Key Diagram

When cross-referencing the current Key Diagram and green trails with the Ipswich cycle map <http://www.greensuffolk.org/assets/Travel-Plans/Documents/Cycling/IpswichCycleMap.pdf> we have the following observations:

1. A green trail clearly suggests a “route”, but the Key Diagram map shows a green area.
2. Under no stretch of imagination would one call a road used by motor vehicles a green trail.
3. No cycle route through the Chantry Park part of the green trail.
4. No cycle route at all through the Humber Doucy Lane stretch of the green trail.
5. No cycle route through the Purdis Heath part of the green trail.
6. No cycle route through the Rushmere Heath part of the green trail.
7. No green cycle route other than Thurlestone Lane in the green trail above Whitton
8. No cycle route in the green trail between Ipswich and Westerfield.
9. No cycle routes through the Pipers Vale and Ravenswood other than a small dead-end stretch in the former and a looped cycle path around Ravenswood housing estate, which is hardly green.

- The Ipswich Cycling Strategy Supplementary Planning Document March 2016

This does not identify any of the Green Rim as cycling corridors as summarised in Map 1 Paragraph 6.12 reflects the Key Diagram. This clearly shows that the Green Rim was never intended as cycle routes and should not be reclassified as Green Trails.



- [Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018<sup>37</sup>](#) Jointly commissioned by Ipswich BC and neighbouring authorities

Pg 11 refers to the Green Rim in the context of the Ipswich Key Diagram stating “this green rim is intended to provide an ecological corridor and a recreational resource”. There is no reference to “trails” and if this was the intention one would have expected IBC to correct this reference as it is fundamental to the report.

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<sup>37</sup> <https://www.ipswich.gov.uk/sites/default/files/settlement-sensitivity-assessment-july2018.pdf>

## **Appendix 2 Extracts from The Institute of Air Quality Management and Environmental Protection UK guidance**

**6.22** The report prepared detailing the results of the assessment should contain the following information (but not necessarily in this order):

*j. Description of construction phase impacts.* These impacts will relate primarily to dust emissions, which give rise to dust soiling and elevated PM10 concentrations, although construction plant and vehicles may need assessment. The assessment should take into consideration the likely activities, duration and mitigation measures to be implemented. The distance over which impacts are likely to occur and an estimate of the number of properties likely to be affected should be included. This assessment should follow the guidance set out by the IAQM31m.

*Summary of the assessment results.* This should include:

- Impacts during the construction phase of the development (usually on dust soiling and PM10 concentrations);
- Any exceedances of the air quality objectives arising as a result of the development, or any worsening of a current breach (including the geographical extent);
- Whether the development will compromise or render inoperative the measures within an Air Quality Action Plan, where the development affects an AQMA.

**6.23** Most assessments are carried out for the first year of the proposed development's use, as this will generally represent the worst-case scenario. This is because background concentrations of some pollutants are predicted to decline in future years, as emissions from new vehicles are reduced by the progressive introduction of higher emissions standards. Where development is phased, however, it may also be appropriate to assess conditions for the opening years of each new phase.

**From:** Claire Sawyer  
**Sent:** 21 January 2020 22:47  
**To:** PlanningPolicy

**Miss Claire Sawyer**

**Planning and Development**  
Ipswich Borough Council  
Grafton House  
15 – 17 Russell Road  
Ipswich  
Suffolk  
IP12DE

31<sup>st</sup> January 2020

To whom it may Concern

**The Building of 23 – 30 Dwellings In Lavenham Road Ipswich**

**Reference planning No: IP061 (UCO64) of the Former School Site on Lavenham Road, Ipswich**

I wish to put into writing my strong objection to the proposed use of/proposed erection of 23-30 Dwellings on Lavenham Road, Ipswich by Ipswich Borough Council.

I have along with other Neighbours examined the plans of the site and knowing the proposed site as well as I do, I feel that it is an unfair move from Ipswich Borough Council to now erect the mentioned above dwellings on the green in Lavenham Road.

The green is used by young children to play on, families to picnic on in the summer months and people who daily walk their dogs and as whole it is enjoyed by all.

This is killing off the final part of an already spoilt open land space to which I was not made aware of at the time of buying my property in 2016.

Unfortunately you gave permission/sold off a large chunk of the green already which has been totally destroyed by Suffolk County Council to build a Respite Home of which type none of us have really been advised of we just keep hearing whisperings that it is going to be a rehabilitation centre for unknown what types of people (the current rumour is that it is going to be for probationers recently released from prison) also residents were not consulted as to if we objected too, nor were we invited to lodge any type of objection, there was no planning meeting or nothing just a letter which was shoved through our doors sighting an incorrect address and placing of the site which we now know is directly on our doorstep!!

I strongly object to having further disruption as we have had since the summer of July 2019 onwards from rude builders who feel it is ok to dump their vehicles on private land leave the place looking an eyesore with their daily

constant use of the dead end road for parking the obtuse amount of white vans and vehicles daily blocking exit and entrance to our own homes and car park and not caring that they do so, the building towers above our properties and eventually will give the residents a clear and open view inside our bedrooms and homes as its been built far too close to our properties with only a footpath between us and them, and I now feel that by planning to put the 23 – 30 dwellings up would be a very unfair move on your part as this will put a terrible strain on an already over used road system being Lavenham Road in total and Kelly Road. This will give us no outlook at all, all we will see is the backs of other houses which is not what we wanted as if we did I/we would of bought a lower valued property in the middle of a cul-de-sac. It will drastically lower the value of our already dwindling properties values, you have offered no service road to help us with parking etc and giving us a better reach to our properties you feel it is ok to just bury our properties behind another load of new buildings which is terribly unfair, you have offered us any olive branch for all of the awful disruption that we are continually being put through at the hands of both our local councils and to this end I want to reiterate again my Very Strong Objection to any further building in the Lavenham Road Areas as quite frankly we are all completely sick of your lack of care to us as residents and house owners.

Yours Angrily  
Claire Sawyer

Sent from Mail for Windows 10

**Felicia Blake**

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**From:** Hilary Scott  
**Sent:** 10 February 2020 16:17  
**To:** PlanningPolicy  
**Subject:** Form raising my objections to the proposed development of 126 houses close to Ainesbourn Crescent, I  
**Attachments:** 5\_updated\_21.01.20\_local\_plan\_final\_draft\_comments\_form\_Hilary Scott  
Ravenswood.doc

Please note my concerns on the attached Word document.

I have twice requested a planning or other reference but this has not been supplied despite your planning team emailing me today ... twice!

Hence the long use of the title of my email and the subject line in the document!

Kind regards  
Hilary Scott

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:

None I can find on the Ipswich Borough Council website

|                                      |                                                                                                                                                                                         |
|--------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                      |                                                                                                                                                                                         |
| Please return this comments form to: | <u>planningpolicy@ipswich.gov.uk</u> or<br><br>Planning Policy Team<br>Planning and Development<br>Ipswich Borough Council<br>Grafton House<br>15-17 Russell Road<br>Ipswich<br>IP1 2DE |
| Return by:                           | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                         |
| This form has two parts:             | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                |

| <b>PART A PERSONAL DETAILS</b>         |                            |                                           |
|----------------------------------------|----------------------------|-------------------------------------------|
|                                        | <b>1. Personal details</b> | <b>2. Agent's details (if applicable)</b> |
| Title                                  | Mrs                        |                                           |
| First name                             | Hilary                     |                                           |
| Last name                              | Scott                      |                                           |
| Job title ( <i>where relevant</i> )    |                            |                                           |
| Organisation ( <i>where relevant</i> ) |                            |                                           |
| Address<br>(Please include post code)  |                            |                                           |
| E-mail                                 |                            |                                           |
| Telephone No.                          |                            |                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

**Your name or organisation (*and client if you are an agent*):**

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| <b>Document(s) and document part.</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------|

| Document(s) and document part.                                                                                                                                           | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><i>An extra 126 homes could be built in Ravenswood after land set aside for a new business park in Ipswich's local plan was changed to allow for more houses.</i></p> | <p>I recently moved to Ravenswood, last June 2019. In this time, I have become aware of the major issues we face on a daily basis, for those of us living here on the development in respect of traffic and cars.</p> <p>One of the most infuriating issues is the number of cars parking on the main road outside the Ravenswood Community Primary School blocking the road completely and if they cannot park on the road, they then drive up onto the verges, ruining the grass verges if they park on them.</p> <p>The roundabouts next to McDonalds are a nightmare and on one occasion it took me an hour to drive out of Ravenswood Avenue and out onto the A14 purely because of traffic congestion.</p> <p>When cars use McDonalds drive through, they queue and block the access to Hening Avenue, this then backs up the traffic on all the access roads around Ravenswood Avenue – which is terrible if you have an ill person or pet who needs to get to the facilities quickly!</p> <p>By adding a further 126 homes, this can only get worse, even if you create another access road off the A1189, the main roundabout will become slower and more congested – and add in the frequent closures of the Orwell Bridge, we get grid locked around here.</p> <p>I would suggest the Planning Committee travel around these roads around commuting times and school drop and collection times, so you can witness the issues we face daily.</p> <p>Rather than build on green land where the wildlife will be negatively impacted and at a time when Climate Change is a major issue, why can't you allow land and buildings in central Ipswich to be used to create more homes, as was shown in a recent Panorama programme on 13<sup>th</sup> January 2020 "How to save the UK's crisis-hit High Streets" where it was shown these town centres need to adopt a different approach and help create a residential hubs and retail communities. By building outside of the main town, you are encouraging traffic pollution, congestion, ill health such as increases in asthma and other breathing issues. PLEASE WATCH THE PROGRAMME IF YOU HAVEN'T, it will be on iplayer! AND I identified this change of use for town centres years ago and raised my ideas with Colchester Planning Committee when I was refused planning permission for an extension to my home!</p> <p>If the land was for businesses, then why cannot it be used to enhance the area, in terms of adding a park or lake, to encourage more wildlife into the area. We need more green spaces and trees and areas of natural beauty, not more homes on an already overpopulated development with too many cars.</p> |

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

| Document(s) and document part | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |
|-------------------------------|--------------------------------------------------------------------------------------------------------------|
|                               |                                                                                                              |
|                               |                                                                                                              |
|                               |                                                                                                              |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

### PRIVACY NOTICE

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**Felicia Blake**

---

**From:** Bashar Shatta  
**Sent:** 10 February 2020 22:08  
**To:** PlanningPolicy  
**Subject:** Concern re Ravenswood Allocation

**Importance:** High

Dear Sir / Madam,

I am writing to raise our concern as a family with regards to the proposed 126 houses off Alensbourn Crescent in Ravenswood, Ipswich.

**Access is a major problem for all Ravenswood residents as well as parking.**

New roads in and out of Ravenswood are needed and more parking spaces should be provided before any other houses are built.

We strongly object to the proposal until at least access issues have been addressed.

Kind regards

Dr Bashar Shatta

S6

**Felicia Blake**

---

**From:** Philip Raiswell ·  
**Sent:** 28 February 2020 12:23  
**To:** PlanningPolicy  
**Subject:** Sport England Representations  
**Attachments:** 20200228 Ipswich Local Plan Reps.doc

Please find enclosed Sport England's representations.

Kind Regards,

**Philip Raiswell**  
Planning Manager

M:\  
E:\



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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                                |
|----------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> |                                                                                                                                                                                                                                                                |
| <b>Please return this comments form to:</b>                          | <p><u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or</p> <p><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b></p> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                                |
| <b>This form has two parts:</b>                                      | <p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>                                                                                                                                                                                |

#### PART A PERSONAL DETAILS

|                                               | <b>1. Personal details</b> | <b>2. Agent's details (if applicable)</b> |
|-----------------------------------------------|----------------------------|-------------------------------------------|
| <b>Title</b>                                  | Mr                         |                                           |
| <b>First name</b>                             | Philip                     |                                           |
| <b>Last name</b>                              | Raiswell                   |                                           |
| <b>Job title (where relevant)</b>             | Planning Manager           |                                           |
| <b>Organisation (where relevant)</b>          | Sport England              |                                           |
| <b>Address<br/>(Please include post code)</b> |                            |                                           |
| <b>E-mail</b>                                 |                            |                                           |
| <b>Telephone No.</b>                          |                            |                                           |

## PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation (*and client if you are an agent*):

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy CS10                    | <p>Sport England are broadly supportive of this policy, but have concerns regarding the reference to 'dual use playing fields'. It is considered that the policy requirement for outdoor sport should not include school playing fields, as these are not always made available for public use, and over use can affect their quality.</p> <p>The requirement for replacement playing fields for Ipswich School must be in addition to the policy requirements for community outdoor sport provision.</p>                                                                                                                                 |
| Policy DMS                     | We support the revisions to this policy, with regard to sites of low quality, which will ensure that sites are not deliberately neglected in order to assist their redevelopment.                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Policy DM12                    | We support this policy, as it adds supporting text promoting the use of Sport England's 'Active Design' guidance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| IP032                          | <p>Sport England raises no objection to this allocation, but we feel the text in relation to the requirements for a replacement facility should be more explicit and should reflect Sport England's policy in relation to replacement playing fields, which states:</p> <p>The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:</p> <ul style="list-style-type: none"> <li>• of equivalent or better quality, and</li> <li>• of equivalent or greater quantity, and</li> <li>• in a suitable location, and</li> </ul> |

| <b>Document(s) and document part.</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                  |
|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                       | <ul style="list-style-type: none"> <li>● <b>subject to equivalent or better accessibility and management arrangements.</b></li> </ul> <p><b>Including the above text within the policy or supporting text would make Sport England support at application stage more likely.</b></p> |

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

| Document(s) and document part | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.) |
|-------------------------------|--------------------------------------------------------------------------------------------------------------|
|                               |                                                                                                              |
|                               |                                                                                                              |
|                               |                                                                                                              |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.

Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.

Adoption of the Ipswich Local Plan Review.

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## Comments on Draft Final Submission Ipswich Local Plan

### Bourne Garden Centre Wherstead Road

On behalf of: Stephen Salter

Prepared by: Steve Miller Dip TP MRTPI

Date: 10/02/2019



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August 2018



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## Introduction

This submission relates to an earlier submission which proposed that Bourne Garden Centre Wherstead Road be allocation for housing development. Officers rejected the submission, ref: 26098

This Statement further makes the case for this residential allocation in the context of the housing constraints in the Borough and the application of the exception test in planning and flooding.

This Statement is submitted on behalf of Stephen Salter, part owner of Bourne Garden Centre. It will look to dispel the Council's concerns and demonstrate that the residential development of the site is necessary to boost deficient housing supply within the town and can be designed to minimise flood risks

It is intended that this document will provide compelling evidence that the development constitutes sustainable development, provides a timely contribution to the housing land supply, raises the design standard of the area and integrates successfully within its particular residential context in accordance with the relevant local, regional and national planning policies.

# Description of Development Site & Proposals

The site is a low-grade open brown-field commercial site in need of major redevelopment. It provides a very poor impression at this southern gateway into the town. There is no commercial interest in investing in major redevelopment. However, the site is ideal for the creation of a landmark housing development which would vastly improve the image of the town and this run-down area. The site owners wish to work with the Council to achieve this and would welcome some pro-active engagement as recommended in the National Planning Policy Framework.

The site owners have invested considerably in the technical assessment of development potential and the current design was conceived by an established local architect, Fielden and Mawson. This is for approximately 100 apartments and , amongst other things, incorporates flood refuges all as detailed in the documents attached to the previous submission, viz-

- Flood Risk Assessment by Paul Snape Consulting dated July 2018 with appendices-
  - A ( Scott Wilson draft Flood Risk Assessment 2007),
  - B- Fielden and Mawson Pre-application report 2017,
  - C- Anglian Water sewer records,
  - D- Hydraulic Modelling Report 2012,
  - E- EA Product Information
  - F- EA Correspondence
- Mr Salter's response form dated 01 October 2018 being an update response for the Strategic Housing and Employment Land Availability Assessment.
- Transportation Noise Assessment Report by Sound Solutions dated 27 September 2018
- Appeal decision ref: APP/J1860/A/14/2214624 dated 6 June 2014, Malvern Hills District Council
-

- Planning Statement

These documents are a matter of record and are not therefore resubmitted with this Submission.

## Planning History

| Reference no. | Description | Decision | Date |
|---------------|-------------|----------|------|
| None          | None        |          |      |
|               |             |          |      |
|               |             |          |      |
|               |             |          |      |
|               |             |          |      |

# Policy Justification

## National

### **National Planning Policy Framework**

Para 8- the 3 components of sustainable development - economic, social and environmental

Para 10- the presumption in favour of sustainable development

Para 11- the tilted balance in favour of development where there is no 5 year supply of housing land

Para 155- where inappropriate development is necessary in high risk areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Para 158- the aim of the sequential test is to steer new development to areas with the lowest risk of flooding.

Para 159- If it is not possible for development to be located in areas of lower flood risk ( taking into account wider sustainable development objectives) the exception test may have to be applied depending on the vulnerability of the site and proposal in line with the Flood Risk Vulnerability Classification

Para 160 - For the exception test to be passed it should be demonstrated that the proposal would provide wider sustainability benefits to the community that outweigh the flood risk, and that the development would be safe for its lifetime without increasing flood risk elsewhere.

## **National Planning Policy Guidance**

Para 033 - when applying the sequential test, a pragmatic approach on the availability of alternatives should be taken

Para 035- this sets out when the exception test can applied, which in this case it can on the basis of Table 3, the site being located within flood zone 3a.

Para 036- sites suited to regeneration will likely pass the first part of the exception test

Para 038- this lists the component parts of a Flood Risk Assessment relating to the safety of developments.

Para 039- ensuring safe access and egress

## Local

### **Core Strategy and Policies 2017**

Policy CS1- this includes the “tilted balance” towards approval as set out within para 11 of the NPPF

Policy DM4- Development must satisfy the following criteria-

- it must not increase the risk of flooding elsewhere
- it will be adequately protected from flooding in accordance with adopted standards
- it will remain safe for its lifetime
- it must include water efficiency measures

Para 9.36 states that “more vulnerable” development as defined may be acceptable in flood zone 3a subject to then being safe.

### **Final Draft- Core Strategy and Policies 2020**

Policy CS1- this commits to working proactively with applicants to find solutions

Policy CS7- the amount of new housing required

Policy DM4- this basically repeats extant policy DM4

Para 9.4.12 basically repeats extant para 9.36

# Planning Considerations

## Flood Risk Assessment

This was submitted previously and demonstrates that the development is safe for its lifetime. A refuge can easily be provided in the flood zone 1 rear part of the site. Compensatory storage of tidal water can be achieved and suitable conditions of planning permission imposed.

There would be adequate warning of any tidal flood through the Environment Agency and media/apps etc. An Evacuation Plan could be easily be formulated to ensure prior evacuation to the flood zone zone 1 part of the site and /or to Bourne Park, (Flood Zone 1 ) a short walk away. Emergency vehicles can access the Park from roads away from Wherstead Road. These details would be incorporated in an Evacuation Plan conditioned in any planning permission.

The development would provide for much-needed new housing in the Borough and improve an unattractive “gateway” into the town. The proposals would therefore help regenerate this area and are thus supported in this respect by the exception test.

The FRA shows that inundation of part of the site would occur in the 1:200 year flood + climate change event. This has been carefully considered in the FRA. It is considered that as only part of the site is in flood zone with the remainder in flood zone 1, the wide forewarning of a flood event through the media and other outlets, a carefully detailed flood evacuation and management plan, and the very close proximity of the site to Bourne Park with its easy emergency vehicle access, are all points in support of the development. All of these matters have to be weighed in the balance when considering whether this part of the exception test is passed.

There is clearly a case for supporting this proposal in consideration of the exception test. The Environment Agency has not objected to the proposals during extensive discussions over recent years and all of their requirements can be incorporated within the development. There have been no objections from the emergency services during this period either.

Following the submission of our earlier statement, the Council received two consultations on which they based their confirmation not to allocate the Nursery for housing. It is not understood why the Environment Agency were not consulted given that they would be a statutory consultee on any planning application made. AECOM commented on the submission and have not objected to the development. They are fully supportive of the proposals but did not conclude on access routes deferring this to the emergency services for consideration.

The Fire Service response is generic only and presumably hasn't taken into account the Flood Risk Assessment. However, it does not object to development where access roads may be inundated. It accepts that evacuation may be necessary and recommends enhanced safety provision such as sprinklers.

Officers consulted the Suffolk Joint Emergency Planning Unit who did not wish to comment but recommended consultation with the Fire Service.

The Officers' conclusions in rejecting the proposals do not appear to follow the clear flexibility shown in the consultee responses. They have adopted a rigid position on access routes which cannot be so concluded from the responses. There is no objection from the Environment Agency.

Having regard to the consultee responses and the detailed considerations on safety in the FRA it is considered that the proposals should be considered acceptable as regards flooding matters.

## Housing Land Supply

As stated in NPPF para 11, strategic policies should provide for objectively assessed housing needs. The draft Local Plan has attempted to provide for this but many of the assumptions are questionable, as discussed below.

Table 1 allocates residential sites totalling 2,750 dwellings. These are mostly small brownfield sites with existing uses which would have to be relocated first. Many have been allocated for many years with no indication that they will be developed within the Plan period.

Table 2 allocates residential sites for 1,470 dwellings to meet the identified need but these already have planning permission and should not therefore be included in a Local Plan. This approach depresses needs calculations and is a form of double counting.

The Plan relies on nearly half of its need from a single large site, Ipswich Garden Suburb. However, outline planning permissions have only just been granted and extensive infrastructure is needed to facilitate the development. If the IGS stalls then the Council will fail to meet anything approaching its housing needs. The delivery of this multi-ownership site has been delayed for many years. It was first allocated in the draft Local Plan in 2001 and finally allocated in the 2012 Local Plan. The current outline planning application ref: 14/00638 has only just been granted after about 6 years. The permission allows the development to commence within 7 years. This record does not bode well.

The Humber Doucy Lane Lane site (ISPA4.1- 500 dwellings) is part of a cross-boundary site and is actually four separate disjointed sites probably in multi-ownership. It is proposed that it be masterplanned with the adjacent East Suffolk draft allocation and timed to be after the Ipswich Garden Suburb. Given the Borough's poor delivery record on the northern fringe, it is queried whether this site can be developed in any meaningful way during the Plan period.

The deficiencies in Local Planning in the Borough are laid bare with housing delivery performance. In the published Housing Delivery Test 2018 which revealed that only 66% of the required homes had been delivered in the three years before thus triggering the need for an action plan. Consequently, a draft action plan was published belatedly in August 2019, but now after 2 years there is no adopted action plan. The draft Plan contains few ideas to boost housing delivery as required by the Government. It only suggests cosmetic administrative devices which will not change much.

The actual housing land supply set out in the Annual Monitoring Report for 2017/18 , Table 15, shows that there is 2.78 years supply. This is the stark reality of all the problems mentioned above. There is no indication that the situation will change any time soon. The Ipswich Strategic Planning Partnership of the Planning Authorities in Eastern Suffolk has been set up but this has not yet delivered a policy approach to the tightly drawn boundary of the Borough. Prior Regional Plans and Structure Plans recognised this is a problem and accordingly allocated part of Ipswich Housing needs in surrounding districts in what was called the Ipswich Policy Area. The demise of this sort of spatial planning has led to the current position where the districts are catering only for their own housing needs. Understandably, there is no political appetite for surrounding rural districts to take some of Ipswich's needs and this will mean that Ipswich will likely continue to fail to deliver sufficient housing.

In this context, there is a strong presumption in favour of developing sites like Bourne Nursery if all other planning issues can be satisfactorily resolved.

## Conclusion

Mr Salter has invested considerable time and expense in investigating the development of Bourne Nurseries. Detailed flooding assessments have been undertaken and extensive consultation taken place with the Environment Agency and emergency services. At all stages the feedback has been positive and the additional technical work carried to the Environment Agency requirements. Not at any stage have fundamental objections been raised.

The latest consultations following our earlier submission has, again, not raised any fundamental objections in principle. All the concerns of the consultees can be met. The site is partly within flood zone 1, the development can be made safe for its lifetime, refuges can be made available on site, flood evacuation routes can easily be facilitated to Bourne Park and compensatory storage can be designed in. Whilst approach routes could be inundated this has not been raised as a fundamental objection by AECOM or the Fire Service and this should be decisive in the expert consideration of the exception test. The Council should defer to the technical experts.

Given that the development and its occupants would, for all practical purposes, be safe then considerable weight should be given to the tilted balance in favour of development here, as set out in the NPPF. Considerable weight should be given to the need for more housing in accordance with the Government's objective to boost housing delivery.

## **Felicia Blake**

---

**From:** Mures, Lucy  
**Sent:** 05 February 2020 08:43  
**To:** Felicia Blake  
**Cc:** PlanningPolicy  
**Subject:** RE: EXTENSION OF TIME: Notice of Public Consultation Ipswich Local Plan Review Final Draft

**Good morning**

Thank you for notification of consultation on the Ipswich Local Plan Review- Final Draft. Suffolk Constabulary does not have any further comments to make relating to the soundness or legal compliance of this document.

May I take this opportunity to acknowledge the positive enhancements to the local plan in terms of the adherence with security measures. Partnership working in this way will ensure that all opportunities to design out crime are taken at the earliest stage in the process, helping to keep our communities safer and providing homeowners and businesses with a clear framework within which to operate.

**With regards**

---

**Lucy Mures**  
Design Out Crime Officer (Ipswich)  
Neighbourhood Partnership Team South  
Police Station  
10 Museum Street  
Ipswich  
IP1 1HT

---

**From:** Felicia Blake <[Felicia.Blake@ipswich.gov.uk](mailto:Felicia.Blake@ipswich.gov.uk)>  
**Sent:** 24 January 2020 09:04  
**Subject:** EXTENSION OF TIME: Notice of Public Consultation Ipswich Local Plan Review Final Draft

Dear Sir/Madam,

Please see attached.

Kind regards,

If you wish to be taken off our email list please reply to me or email [PlanningPolicy@ipswich.gov.uk](mailto:PlanningPolicy@ipswich.gov.uk)

**Felicia Blake**

**Business Support Officer  
Planning and Development  
Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1 2DE**

Tel: 01473 43 2019  
Email: [felicia.blake@ipswich.gov.uk](mailto:felicia.blake@ipswich.gov.uk)  
Web: [www.ipswich.gov.uk](http://www.ipswich.gov.uk)  
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**Useful Links:**

**Current Consultations**

<https://www.ipswich.gov.uk/currentconsultations>

**Closed Consultations**

Draft Suffolk Coast European Sites Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (SPD) <https://www.ipswich.gov.uk/suffolk-coast-rams-spd>

Ipswich Local Plan Review Preferred Options <https://www.ipswich.gov.uk/ipswichfuture>

Conservation Areas Designation <https://www.ipswich.gov.uk/content/about-our-conservation-areas>

**Forthcoming Decisions List**

<https://democracy.ipswich.gov.uk/mgListPlans.aspx?RPlId=135&RD=0&bcr=1>

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<https://www.ipswich.gov.uk/content/urban-character-supplementary-planning-document>

<https://www.ipswich.gov.uk/content/development-and-archaeology-supplementary-planning-document-spd>

**Adopted Ipswich Local Plan 2011-2031**

<https://www.ipswich.gov.uk/content/adopted-ipswich-local-plan-2011-2031>

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Date: 2 March 2020  
Enquiries to: Cameron Clow  
Tel:  
Email:



Ipswich Borough Council,  
Grafton House,  
Russell Road,  
Ipswich,  
IP1 2DE

Dear Mr Fulcher,

### Ipswich Draft Local Plan: Regulation 19 Consultation

Thank you for consulting Suffolk County Council on a new Local Plan for the county town of Ipswich.

Suffolk County Council (SCC) strongly supports the Borough Council's efforts to put a plan in place to guide sustainable growth. Throughout the process of producing this Plan, the Borough and County Councils have made extensive efforts to cooperate on local and strategic matters, not least through the Ipswich Strategic Planning Area Board, and the County Council is grateful for the efforts made by the Borough.

Generally, the County Council supports the draft Local Plan, however there are parts of the plan which require amending to be sound.

This letter will set out where the plan is not sound, explain which of the tests soundness parts of the plan does not comply with (as set out in paragraph 35 of the NPPF). The County Council considers that the plan can be made sound and will provide support to the Borough Council to do so where necessary.

Where amendments to the plan are recommended, deleted text will be in ~~strikethrough~~ and added text will be in *italics*.

---

#### Table 8a Major Infrastructure Proposals

This part of the plan is not sound because it is not in line with national policy. NPPF paragraph 34 explains that plans should set out the contributions expected from development and this part of the plan needs updating to meet this requirement. The County Council will work with the Borough in reviewing the wording and costs in the table and will agree matters through a Statement of Common Ground.

#### *Early Years Education*

This part of the plan is not sound as it is not effective. In setting out the strategy to address early years demand caused by growth in the Gipping Ward, the table states that a new setting (such as a day nursery) on a development site is required, however the specific site has not been stated. In order to provide certainty that development in the Gipping Ward can mitigate its impact, the site should be specified in the plan. Options considered throughout the plan making process have been

sites IP003, IP051 and IP279. IP003 and IP051 are both within flood zone 3, while IP279 is largely outside flood zones 2 and 3. Taking a sequential approach to more vulnerable uses, IP279 would be the County Council's preferred choice for a setting. The site sheet and entry in Table 1 of the Site Allocation Policies document should also be updated in line with this amendment.

#### ***Primary Education.***

In addition to the expansion of Rose Hill Primary, St Mark's and Sprites Primary schools, there will be a requirement to expand Cliff Lane Primary School. However, depending on the precise number of pupils, either St Mark's or Sprites Primary schools or both would need to expand. To make this part of the plan sound, Cliff Lane Primary should be added to Table 8a.

#### ***Secondary Education***

The County Council has reassessed the secondary school needs arising from the local plan with updated pupil forecasts (January 2020), which has resulted in a change of strategy. Table 8a currently states that both Stoke High School and Chantry Academy need to be expanded. In previously assessing the need for secondary school places, SCC used the school pyramids to identify where pupils from development would attend school. However, Ipswich is unusual in Suffolk in that the school pyramid areas and the secondary school catchment areas are different from one another. On reflection, the County Council considers it is more appropriate to base the secondary school strategy on the school catchments. Depending on the rate of delivery within Ipswich Garden Suburb, this results in only Stoke High School needing to expand..

#### **Primary Education**

##### ***Site Sheet for Site IP010a***

This part of the plan is not sound because it is not effective. The County Council welcome that the need to expand the school has been recognised within the plan, however feasibility work which has been undertaken since the preferred options consultation of the plan show that the area of land needed to expand the school is 0.8ha.

#### **Early Years Education**

##### ***Site Sheet for Site IP048a***

This part of the plan is not sound because it is not effective. Included among the uses of this site should be an early years setting to accompany the new primary school. The 60 place early years setting, which is necessary on this site to mitigate impacts of plan growth, is accounted for in Table 8a of the Core Strategy document. However, this should also be included on the site sheet in order to provide certainty in delivering an early years setting on this site.

##### ***Table 1 of the Site Allocations Policies document***

This part of the plan is not sound because it is not effective. The entry for site IP048a and IP037 on this table should include an early years setting, to provide certainty in delivering an early years setting on this site, in order to mitigate the impacts of growth on the provision of early education.

#### **Transport**

As justification for this policy the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area should be included in the plan evidence base, alongside the results of the Suffolk Transport Model.

##### ***Policy CS20 and Transport Mitigation Strategy for the ISPA***

Reference to the Transport Mitigation Strategy for the ISPA is welcome and very much supported, as is the focus on sustainable transport measures. As a strategic priority, the Plan needs to address the cumulative transport impact created by planned growth in the Ipswich Strategic

**Planning Area (ISPA).** As a cross boundary issue, it is appropriate that this is reflected in strategic policy, as stated in paragraph 21 of the NPPF. Suffolk County Transport Model highlights that growth in Ipswich and the surrounding districts may cause severe impacts on the highway network within and around Ipswich, which cannot be addressed through improvements to the highway alone. The Plan must include an appropriate strategy to avoid severe and significant transport impacts in the ISPA. Within the wider Ipswich area, the strategic routes of the A14 and A12 would also receive greater volumes of traffic, which could have severe consequences for traffic flows along these routes and the safety of road users. Several substantial modifications to junctions would be required, which would require significant investment funded by new developments.

Understanding that viability for new development could be comprised, and reflecting on the need to shift travel patterns, the County Council sought to work out what degree of modal shift would be required and what steps could be taken to produce such shifts. The resultant Mitigation Strategy was produced to provide evidence during the Suffolk Coastal Local Plan examination and not just for this part of Suffolk, but also for the Borough of Ipswich, Babergh and Mid Suffolk districts.

The County Council considers the appropriate strategy to be maximising sustainable transport in order to achieve a significant proportion of modal shift in both the new and existing population. The Mitigation Strategy was submitted as evidence to the Suffolk Coastal Local Plan Examination and referenced in the County Council response to the Babergh and Mid Suffolk Preferred Options Joint Local Plan and includes:

- A Transport Mitigation Strategy for the Ipswich Strategic Planning Area – representing Suffolk County Council's approach to delivering modal shift measures to reduce impacts on the highway network and key junction improvements;
- A transport modelling report, which assesses the impact of applying the modal shift identified in the Transport Mitigation Strategy and evidence submitted alongside the Plan;
- A methodology report which supports the modelling report; and
- A statement on highway impacts on the Strategic Road Network, produced by consultants WSP

The evidence base for the Local Plan includes the most recent Suffolk Transport Model results and methodology report, which is welcome. In order to have a consistent approach to addressing the described impacts in the ISPA and on Ipswich, a shared evidence base across planning authority boundaries is required to justify this approach. The Suffolk County Council Transport Mitigation Strategy is currently not part of the evidence base of the submission draft Local Plan and needs to be included in order to ensure this approach is sound. Achieving significant modal shift is a Local Plan Objective (5) and the Transport Mitigation Strategy is reflected in policies CS5 and CS20.

#### *Policy DM21*

This part of the plan is not sound because it is not in line with national policy, specifically in relation to the lack of explanation as to when travel plans are required. Paragraph 111 of the NPPF states that where a development is likely to generate significant amounts of movement should be supported by a Travel Plan. The County Council has produced further detailed guidance<sup>1</sup> as to when a Travel Plan or Travel Plan measures should be implemented for a site. These indicative thresholds are set out in the table below.

The importance of travel plans in achieving modal shift to sustainable modes of transport is stated in the Suffolk County Council Transport Mitigation Strategy for the ISPA which states in paragraph 5.2.16:

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<sup>1</sup> <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/Local-Links/26444-Suffolk-Travel-Plan-Guidance-V5-Web-Version-LR.pdf>

**"The effectiveness of Travel Plans secured through the planning process would only provide a contribution towards positive modal shift if fully supported. There needs to be a firm endorsement of the role that Travel Plans have in the effective mitigation of development supported through local plan policy"**

A similar approach should be taken with Travel Plans as is taken with Transport Statements and Assessments. The Plan's explanatory text should make reference to the indicative threshold set out in County Council guidance, with the caveat that in some sensitive areas, such as those within or affecting Air Quality Management Areas, full travel plans may be required where normally Travel Plan Measures would be acceptable. The table below shows the thresholds included in the County Council guidance.

| Land use                                                      | Travel Plan measures required | Travel Plan required      |
|---------------------------------------------------------------|-------------------------------|---------------------------|
| <b>A1 Food retail</b>                                         | →250←800 sq. m                | →800 sq. m                |
| <b>A1 Non-food retail</b>                                     | →800←1500 sq. m               | →1500 sq. m               |
| <b>A2 Financial and professional services</b>                 | →1000←2500 sq. m              | →2500 sq. m               |
| <b>A3 Restaurants and cafés</b>                               | →300←2500 sq. m               | →2500 sq. m               |
| <b>A4 Drinking establishments</b>                             | →300←600 sq. m                | →600 sq. m                |
| <b>A5 Hot-food takeaway</b>                                   | →250←500 sq. m                | →500 sq. m                |
| <b>B1 Business</b>                                            | →1500←2500 sq. m              | →2500 sq. m               |
| <b>B2 General Industrial</b>                                  | →2500←4000 sq. m              | →4000 sq. m               |
| <b>B3 Storage or distribution</b>                             | →3000←5000 sq. m              | →5000 sq. m               |
| <b>C1 Hotels</b>                                              | →75←100 bedrooms              | →100 bedrooms             |
| <b>C2 Residential institutions – hospitals, nursing homes</b> | →30←50 beds                   | →50 beds                  |
| <b>C2 Residential institutions – residential education</b>    | →50←150 students              | →150 students             |
| <b>C2 Residential institutions – institutional hostels</b>    | →250←400 residents            | →400 residents            |
| <b>C3 Dwelling houses</b>                                     | →50 ←79 dwellings             | →80 dwellings             |
| <b>D1 Non-residential Institutions</b>                        | →500←1000 sq. m               | →1000 sq. m               |
| <b>D2 Assembly and leisure</b>                                | →500←1500 sq. m               | →1500 sq. m               |
| <b>Others</b>                                                 | Discuss with SCC Highways     | Discuss with SCC Highways |

In order to ensure that all development deliver a sufficient Travel Plan or Travel Plan measures an amendment to the policy is recommended below.

**"The Council will expect major development proposals to provide a travel plan or travel plan measures where appropriate, to explain how sustainable patterns of travel to and from the site will be achieved."**

An amendment to paragraph 9.21.8 is recommended below to further explain the travel plan guidance and what is determined to be "appropriate".

**"The County Council's Suffolk Travel Plan Guidance, which contains indicative thresholds will be used to determine the need for a Travel Plan or Travel Plan Measures. Some**

*smaller sites which do not meet the requirements for a full Travel Plan, but are in sensitive locations may require a full Travel Plan to help mitigate traffic impacts."*

#### **ISPA4**

The County Council welcomes the policy commitment to coordinate development across boundaries. It is noted that this area is outside of any of the buffers district or local centres defined on Plan 1. NPPF paragraph 92 states that planning policies and decision should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services." Paragraph 103 states that the planning system should limit the need to travel, through an appropriate mix of uses.

In order to enable access to services and make future communities in the area defined by ISPA4 sustainable the policy should state the masterplanning of the site should also consider the inclusion of a local centre.

This will also help to keep the plan more internally consistent as paragraph 6.17 states that where possible development should be located so that residents can access existing local or district centres. As this is a large development, outside of local or district centre buffers, the potential scope for a new local centre appears to be an aspect that should be investigated through masterplanning.

#### **Town Centre Parking**

In considering the future of Ipswich, the combined challenges of reducing carbon dioxide emissions to mitigate the impact of climate change and improving the air quality of major towns like Ipswich does mean that there needs to be a reduction in the number of private cars using the highway network in Ipswich throughout the plan period, regardless of technological improvements.

Furthermore, there is simply not the physical space within the town to allow for a free-flow of traffic with the level of travel demand that is likely to be generated. Producing the shift in travel patterns is required over the long-term but short-term actions are also necessary. These are currently but are not limited to:

- Promotion of travel planning to existing residents and employees, as well as those from new development. (The programme is known as Smarter Choices and the positive way individuals can make such changes in personal travel a fundamental feature);
- The quality bus partnership, which is already being established, to improve the coordination between bus companies and target investment into bus services;
- Physical infrastructure improvements that are necessary to improve public transport provision and encourage more people to walk and cycle, and
- Achievement of a parking strategy that supports modal shift.

During 2019, WYG Transport Planning finalised its report into forming a parking strategy, which Ipswich Borough Council commissioned to support its forthcoming strategy. This study focused on public car parks in the town centre and did not include private staff car parks. The report has only recently been published by the Borough Council, although Suffolk County Council was involved in different stages during its production.

#### ***WYG Report***

There is a tension between managing parking demand and achieving a shift in travel from single-occupancy trips by car. This tension, and the need for a balance, is expressed well by WYG (para. 7.2.8) that:

*"It is important that the parking strategy fits as one element of a coherent overarching transport and access strategy for the town. Care should be taken to ensure that the proposed level of parking is not set too high as to inadvertently encourage car use to access the town to the detriment of more sustainable modes, particularly if doing so would be likely to undermine the viability of such services and supporting infrastructure (e.g. congestion increasing delay for public transport vehicles or severance of key links for pedestrians and cyclists by major traffic corridors). This said, the future prosperity and economic success of the town centre will be reliant upon reasonable access by car."*

There is also considerable acknowledgment of the potential role for Park and Ride services in reducing demand for town centre parking but that this potential could be inhibited unless "major changes are also made to the number of spaces and cost of town centre parking" (para. 6.3.9). Furthermore, Park and Ride services could assist freeing up long stay spaces to short stay (para. 9.5.6) and that "the parking strategy needs to be consistent with the Local Transport Plan if steps to tackle congestion and air quality problems are to be successful" (para. 9.6.3).

WYG's report makes recommendations and does not set out a strategy, this will be formed and adopted by the Borough Council separately (Policy CS20.e.). WYG's report includes several policy options and matters that require further consideration. For example, regarding parking and land use development, WYG recommend (page 105) the Borough Council:

*"Consider the impacts of redistributing car parks across the town centre to better meet demand in the future. It may be necessary to create more spaces in the Riverside, Station & Office and Town Centre North zones and reduce the future number of spaces in the remaining zones."*

The WYG analysis accounts for the replacement of all temporary car park spaces and, whilst the replacement parking spaces in Town Centre Central, East & West is "of the right order", additional spaces over and above the planned additional spaces were identified within the Riverside & Cardinal Park area, around the Station & Office area to the West of the Town Centre, and within the area to north of the Town Centre (para. 9.3.7). However, the provision of additional spaces is one of the options contained the WYG report.

In commissioning this report, the Borough Council did take account of the need to achieve modal shift, which translated into an overall reduction in future parking demand by 10% on additional growth. This reduction reduces the growth in parking demand assumed to arise based on TEMPro growth factors. The analysis was undertaken in 2017 and, at the time, the use of the growth factors and the 10% modal shift assumption was reasonable, but both assumptions predate the Transport Modelling by WSP or the Transport Mitigation Strategy. For example, the WSP Modelling assumes a 15-20% reduction in employment trips to the Town Centre by new development (ISPA Local Plan Modelling, Table 5-2).

The Local Plan modelling includes trips already on the road network and accessing existing car parking spaces. However, as the Borough Council prepares its parking strategy, the implications for transport modelling need to be considered because there might be different impacts from that already modelled such as through the relocation of existing spaces.

For Ipswich (the whole administrative area), TEMPro predicts a 19% growth in car-based trips between 2016-2036, whereas the modelling for the Local Plans Indicates a 31% increase in the AM peak destination trips.

The WYG analysis recommends using new technology to analyse occupancy data to better understand the location and quantity of long and short stay parking and the turnover of spaces (page 114). This, combined with other technological improvements such as variable message

signs, should allow for increased occupancy beyond the 85% occupancy level assumed in the report.

What is notable is that the parking survey undertaken before the reopening of the Crown Street Car Park and the occupancy of some car parks was modelled from other surveys.

In summary, the rate of traffic growth assumed by the parking strategy is lower than that which is being forecast by the Local Plan modelling, even accounting for modal shift. However, meeting this demand would only not address the level of congestion and the combined challenges carbon reduction and improving the air quality.

#### *Parking Strategy outlined in the Local Plan*

Part of the equation in developing and implementing the parking strategy will be the need to constrain the attractiveness of long stay parking for commuters who are working in Ipswich. The current Reg 19 document does recognise:

- the need to mitigate transport impacts within Ipswich because of planned growth in the overall Ipswich strategic planning area;
- the modal shift strategy that was published by Suffolk County Council during the examination of the Suffolk Coastal Local Plan;
- the quality bus partnership;
- the promotion of smarter choices;
- infrastructure improvements;
- within the central parking core, the achievement of a parking strategy that supports modal shift.

The Local Plan also highlights park and ride provision, particularly the Bury Road park and ride site. The Local Plan also states that a new Ipswich Town centre parking plan will be adopted. Clearly, the Local Plan cannot take account of the yet to be agreed parking plan, but, in order to be effective, greater clarity is needed on how the spatial strategy responds to the recognition in the WYG report that care needs to be taken to ensure that the proposed level of parking does not inadvertently encourage car use.

The plan does follow on from previous policy positions of constraining long stay parking within the central parking core, and that only the operational parking for non-residential development will be allowed. What the WYG report highlights is that, within this central area, there is already more focus on short-stay parking and long-stay car parks are already outside this zone.

The central parking core is defined in the IP1 area policies map and covers the town centre parts of the South East of Ipswich including Cardinal Park and the existing post office site. It also includes the Waterfront area and the University but does not include the areas to the west of the town, the Portman Road parking area, and doesn't include the Crown Street Car Park.

The area to the West of the town centre has predominantly been for long stay parking in association with the office uses and the railway station. Policy DM-22 states that no non-residential long stay car parks will be permitted. What is not clear is whether this is associated with the whole of the IP1 area or just the central parking area. The supporting text does provide some greater clarity on this that it is for central parking core but to avoid inadvertently encouraging car use and increasing congestion, the control of the supply of additional long-stay spaces must be extended to the whole IP1 area.

The IP1 insert map of the Local Plan does identify four points allocated for multi storey car parks: the mint quarter (short stay), Portman Rd (long stay), West End Road (long stay) and at site IP049 near the University (long stay).

The IP1 area insert map does not relate to the policies within the Local Plan document, particularly policy SP17 (town centre car parking). This policy does recognise the aims of supporting the economy, limiting congestion and encouraging use of modes of transport the policy then recognises the central parking core, for which policy DM-22 applies. SP17 then states which of the sites are allocated for multi storey car parks as: the mint quarter car park for short stay (IP048), West End Road (IP015) for long stay and Orwell Quay (IP049) also long stay. The Local Plan does not state that the old cattle market Portman Rd site is allocated, instead it says that the provision of the multi storey car park at West End Road will replace the on-site surface parking including the old cattle market if this is not replaced on site through development on a "like for like" basis.

This seems a logical approach because the old cattle market site is allocated for employment uses therefore the surface parking will be naturally displaced. The site sheet for IP051 does recognise the allocation policy SB05 and SP17.

SP5 refers to land allocated for used as specified in Table 3 and that IP051 will be redeveloped for office (80% of the site) and main town centre uses (20%). It then goes on to say numerically like for like replacement of existing long stay parking provision in this area, which can be assumed to be the site itself. This then means the local plan, in allocating the old Portman Road site for a multi storey long stay parking, is simply to replace the parking provision on the site that is being lost at either this site or at West End Road. The "like for like" replacement approach must be made clearer in the Local Plan otherwise this could undermine the restraint on the provision of long-stay spaces in the IP1 area.

Turning back to policy SB17, the emphasis of the policy is the provision of a long stay multi storey car park at West End Road as the preferred strategy for the replacement of existing long stay parking at Portman Rd (IP 051). If this was not the case, and the preferred strategy would be to replace on site, policy SP17 would be clearly setting this out but then also reflecting that the quantum of spaces would be for replacement reasons only.

Whilst there might be some additional provision during the period between a multi-storey car park being opened and a site being redeveloped, there is not a policy or other mechanism to make this period as short as possible. The County Council's concern is that the additional long-term spaces would be available over a long period of time, which would influence travel behaviour and undermine efforts to encourage people to walk, cycle or use passenger transport.

The continued restriction on operational parking within the central core is welcome. Whilst there is some definition of operational parking through reference to staff parking not being included (para.9.22.8), examples of what would be included would provide a positive position. This could include spaces for deliveries, visitor spaces and potentially spaces for staff who use private transport for visiting clients for example. The county council would welcome the opportunity to discuss how the approach to operational and staff parking within the IP1 area could be effective.

### Flooding and Water Management

#### *Strategic Flood Risk Assessment.*

The County Council has been working with the Borough Council and its consultants in preparing the Strategic Flood Risk Assessment (SFRA) and this collaborative working is appreciated. The SFRA is still currently in draft form and needs further work arising from data to be provided by the Environment Agency. The County Council, as the Lead Local Flood Authority, will assist the Borough in further developing this important piece of evidence, ensuring plan policies are

appropriately justified. Changes will be subject to ongoing work, however, in broad terms, the SFRA would benefit from setting out how development needs to respond to local circumstances and then the policies and site sheets to incorporate the overall results. Some of this information will likely be able to be transferred from the previous SFRA, as well as more location specific advice.

In order to ensure the plan is effective and consistent with national policy, subsequent changes to the plan may be required on completion of the SFRA.

#### *Policy DM4 Development and Flood Risk*

Policy DM4 is not sound because it is not consistent with national policy. NPPF paragraph 165 states "Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate."

Part a) of this policy states development will be approved where:

"It does not increase the overall risk of all forms of flooding in the area or elsewhere through the layout and form of the development and wherever practicable appropriate application of Sustainable Drainage Systems (SuDS)"

Planning practice guidance paragraphs 082 and 083 uses the term "practicable" in reference deciding the most appropriate type, operation and maintenance of SUDS on a site, rather than the principle of whether SUDS should be used on a site. The guidance makes a distinction between the terms "inappropriate" and "practicable". As such, the current wording of the policy is not consistent and could cause confusion.

The words "where practicable" should be removed from the policy.

#### Archaeology

##### *Site IP028b*

This part of the plan is not sound because it is not effective. The text states this site refers to Archaeological Character Zone 2, but the site lies within Archaeological Character Zone 1b, for the Historic Core, and is therefore of a higher sensitivity than indicated on the site sheet. This text should be corrected to ensure that heritage assets are appropriately identified and approached by development.

*The site lies on the edge of the River Gipping, within the likely former extent of the precinct of the medieval Franciscan friary (Greyfriars). There is potential for archaeological remains relating to the friary to survive on the site, as well as earlier occupation on the edge of lower lying marshy land. Within the western part of the site, marsh deposits have been identified, but human remains were recorded during construction of the eastern side of the existing buildings on the site. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). This site likely lies in the former extent of the town-march. Palaeoenvironmental assessment and mitigation for impacts on deeper deposits may be required. Deep excavations may encounter waterlogged features. Stratigraphy may be expected to be particularly deep in former streams and watercourses and waterlogged features are recorded in the Urban Archaeological Database.*

#### *Site sheet information*

While not strictly related to soundness, information on some site sheets could be updated to provide helpful information or improve the accuracy of the information. Amendments are suggested below:

IP011c, the separation of 011 into b and c means some further clarification is required. Amend to: 'The site lies... close to the grade II\* St Mary at Quay Church, ~~contains two scheduled~~ monuments and lies within an area of archaeological importance.' Also amend: 'There is also limited potential for nationally important archaeological remains outside of the ~~scheduled and previously scheduled areas. This is because much of the site has already been excavated in the past. Detailed early Pre-application discussion with Suffolk County Council Archaeological Service is advised and Historic England would be required to agree the scope of required assessment, the principle of development and to inform design.~~'

IP354, the following information could be added:

*The site lies in the vicinity of Roman remains, likely on reclaimed land. The site lies across Archaeological Character Zones 1d and 2a as set out in the Archaeology and Development SPD. It is likely that archaeological considerations could be managed through conditions on consent, although early consultation with Suffolk County Council Archaeological Service is advised.*

IP355, the following information could be added:

*The site lies in the vicinity of Roman remains, likely on reclaimed land. The site lies across Archaeological Character Zones 1d and 2a as set out in the Archaeology and Development SPD. It is likely that archaeological considerations could be managed through conditions on consent, although early consultation with Suffolk County Council Archaeological Service is advised.*

ISPA 4.1, the following information could be added:

*These large greenfield areas have not been previously systematically investigated for archaeological remains. Archaeological evaluation should be undertaken to inform planning applications, comprising a combination of desk-based assessment, geophysical survey and an appropriate level of trial trench archaeological evaluation (see character zone 2c in Archaeology and Development SPD).*

IP089

This site is a large area ~~in~~ on the edge of the Anglo-Saxon and Medieval core and within the Area of Archaeological Importance (IPS 413).

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I hope that these comments are helpful. Please contact me via the contact details at the top of this letter, if I or my colleagues can be of any assistance.

Yours faithfully,

Cameron Clow,  
Senior Planning and Growth Officer,  
Strategic Development,  
Growth, Highways and Infrastructure

This submission is unconfirmed

[26244]

## Object Policy DM11 Countryside

Respondent: Suffolk Preservation Society (Bethany Philbedge) [1352]

Received: 26/02/2020 via Web

The Suffolk Coasts and Heaths Area of Outstanding Natural Beauty is only referred to in policy DM11 in terms of major development within the AONB. The policy should relate to all development both in, and within the setting of, the AONB. We suggest that the policy is reworded so that it is clear that it fulfils the statutory duty under section 85 of the 2000 CROW Act.

**Changes to plan:** We suggest that the policy is reworded so that it is clear that it fulfils the statutory duty under section 85 of the 2000 CROW Act which requires that 'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'.

Document is not legal

Document is not sound

Representation at examination: Written Representation

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

**e-mail:**

**planningpolicy@ipswich.gov.uk**

**Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.**

**website:**

**www.ipswich.gov.uk**



|                                                               |                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation document(s) to which this comments form relates: | <b>Core Strategy and Policies Development Plan Document Review-Final Draft</b><br><b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review – Final Draft</b><br><b>Site Sheets Part 2 – IP080-ISPA 4.1</b><br><b>Plan 5 – Ipswich Ecological Network</b> |
| Please return this comments form to:                          | <u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or<br><br>Planning Policy Team<br>Planning and Development<br>Ipswich Borough Council<br>Grafton House<br>15-17 Russell Road<br>Ipswich<br>IP1 2DE                                                                |
| Return by:                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                                                                           |
| This form has two parts:                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                                                                                  |

#### PART A PERSONAL DETAILS

|                                        | 1. Personal details                                           | 2. Agent's details (if applicable) |
|----------------------------------------|---------------------------------------------------------------|------------------------------------|
| Title                                  | Ms                                                            |                                    |
| First name                             | Jill                                                          |                                    |
| Last name                              | Crighton                                                      |                                    |
| Job title ( <i>where relevant</i> )    | Conservation Planner                                          |                                    |
| Organisation ( <i>where relevant</i> ) | Suffolk Wildlife Trust                                        |                                    |
| Address<br>(Please include post code)  | Brooke House<br>The Green<br>Ashbocking<br>Ipswich<br>IP6 9JY |                                    |
| E-mail                                 | .....                                                         |                                    |
| Telephone No.                          |                                                               |                                    |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                        |
|----------------------------------------------------------------------|------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Suffolk Wildlife Trust |
|----------------------------------------------------------------------|------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.                                                                                   | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Core Strategy and Policies Development Plan Document Review-Final Draft Chapter 5. Section 5.26, Table 2.</b> | <p>Biodiversity Section currently states – “The need to halt biodiversity net loss.”</p> <p>Suggest this is amended to state - “Prevent loss of biodiversity and Implement measures for biodiversity net gain”</p> <p>The government is mandating that, through the new Environment Bill, all development (with a few exceptions) will be required to secure gains in biodiversity. It is therefore not sufficient to state that there will be a halt in net loss.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Core Strategy and Policies Development Plan Document Review-Final Draft Chapter 6, Objective 9.</b>           | <p>“9. NATURAL ENVIRONMENT – To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use.”</p> <p>Consider addition of reference to ecological networks and connectivity. NPPF references the need to establish, conserve, restore and enhance ecological networks under Paragraphs 173-d. and 174-b.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Core Strategy and Policies Development Plan Document Review-Final Draft Policy DM8</b>                        | <p>With regards to development which could have an impact on an SSSI, Policy DM8 conflicts with the NPPF.</p> <p>DM8 states that “Sites of Special Scientific Interest (SSSI) will be protected from development, which directly or indirectly would have an adverse effect on their natural value. An exception will only be made where a proposed development:</p> <ul style="list-style-type: none"> <li>a. could not be located on an alternative site that would cause less harm;</li> <li>b. would deliver benefits that clearly outweigh the impacts on the site’s special interest and on the national network of such sites; and</li> <li>c. would compensate for the loss of natural capital.”</li> </ul> <p>Conditions a. and c. clearly conflict with Paragraph 175b of the NPPF which only allows for Condition b. (benefits outweighing impacts).</p> <p>This Policy should be updated to reflect this.</p> |

| <b>Document(s) and document part.</b>                                                                                                                            | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Core Strategy and Policies Development Plan Document Review-Final Draft Policy DM12</b>                                                                       | In Policy DM12, point d. there should be an inclusion of the potential for installation of green roofs and walls as part of the strategy to introduce greener streets and spaces. This would make a more robust argument for the requirement for net gains in biodiversity.                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Core Strategy and Policies Development Plan Document Review-Final Draft Policy DM15</b>                                                                       | <p>We have been informed by the RSPB that a suggestion was made to add a further point to DM15 – Tall Buildings with regards to the provision of swift bricks in new buildings.</p> <p>This is a sentiment we share at the Suffolk Wildlife Trust, and we note that there are no references to Green Space or biodiversity measures within this policy, which appears to be a valuable missed opportunity.</p> <p>We propose the addition of a further point: k. to incorporate integrated swift bricks”.</p> <p>In addition to this, other biodiversity features could be noted here, such as the provision of green walls and roofs which would help meet the biodiversity net gain requirements.</p> |
| <b>Core Strategy and Policies Development Plan Document Review-Final Draft Policy DM17</b>                                                                       | In addition to the points made under Policy DM17 regarding small scale residential developments for infill, backland or severance plots, a point should also be made to deny permission for any development which could result in an unacceptable loss of semi-natural habitat, which could be important in its own right, or support protected and/or priority species.                                                                                                                                                                                                                                                                                                                                |
| <b>Core Strategy and Policies Development Plan Document Review-Final Draft Policy ISPA2</b>                                                                      | Strategic Infrastructure Priorities - We consider that policy ISPA2 should also include delivery of strategic green infrastructure alongside the other types of infrastructure listed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Site Allocations and Policies (Incorporating IP- One Area Action Plan) Development Plan Document Review – Final Draft Site Sheets Part 2 – IP080-ISPA 4.1</b> | <p>Policy DM10 of the Core Strategy and Policies Development Plan Document Review-Final Draft seeks to maintain and enhance green corridors and find opportunities to link existing green corridors.</p> <p>However, two of the sites proposed for development, IP143 and IP067b, currently make up quite a substantial part of Green Corridor F, forming the semi-natural habitat link between the south-western boundary of Landseer Park Carr County Wildlife Site (CWS) and the western boundary of the Volvo Raeburn Road CWS. If these sites are fully developed, this ecological network would be interrupted.</p>                                                                               |

| <b>Document(s) and document part.</b>                                                       | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>In association with Plan 5 – Ipswich Ecological Network and Plan 6 – Green Corridors</b> | <p>Green Corridor F is the longest existing ecological network in Ipswich, and if sensitive development is undertaken in the Ravenswood area (Sites IP150b, c, d, e and IP152), maintaining a good proportion of the existing habitat, then this corridor could be continued to the east.</p> <p>This network would begin at Holywells Park, continue through Landseer Park, Sites IP143 and IP167b to Volvo Raeburn Road Site, Piper's Vale, Brazier's Wood, Pond Alder Carr and Meadow and fork at Bridge Wood (on the opposite side of A14) continuing to the River Orwell to the south and via Sites IP150b, c, d, e and IP152 onwards to Foxes Pit, Fox Farm Meadows and surrounding woodland blocks across the A14 to the east.</p> <p>We are pleased to see that so many of the recommendations from the Ipswich Wildlife Audit 2019 have been taken into account.</p> |
| <b>Plan 5 – Ipswich Ecological Network</b>                                                  | This map refers to Wildlife Audit 2012/2013, which is not the most up-to-date Audit as a further Audit took place in 2019.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

**Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.**

### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

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Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

T



**Felicia Blake**

---

**From:** Gavin Jones  
**Sent:** 03 March 2020 09:41  
**To:** Felicia Blake  
**Subject:** FW: CC179790835: General Enquiry Received: Planning & Development

This might be a Local Plan rep.

**From:** Ipswich Borough Council <talbotclaire@hotmail.com>  
**Sent:** 02 March 2020 22:01  
**To:** Development Management <Development.Management@ipswich.gov.uk>  
**Subject:** CC179790835: General Enquiry Received: Planning & Development

# MY IPSWICH

---

**Ref No:** CC179790835

---

Dear Colleague,

A customer has submitted an online 'General Enquiry' form for your service area. Please find the details of the 'General Enquiry' listed below.

---

**Service area:** Planning & Development

**Details of enquiry:** In response to consultation of Ravenswood re: housing and skate park plans. The split between private and social housing needs to be in line with the rest of the estate. We do not want a repeat of the UVW situation where the land was earmarked 100% social. Traffic issues need to be considered, traffic already backs up daily at the McDonald's roundabout before additional housing. So would there be another entrance/exit? Concerns over disruption to and loss of wildlife. Instead of a skate park, an extension of the country park would give a space for recreation as well as maintaining wildlife.

---

**Customer Details:**

**Name:** Claire Talbot

**Email Address:** [talbotclaire@hotmail.com](mailto:talbotclaire@hotmail.com)

**Contact Number:**

**Address:**

---

**What you need to do next?**

- The customer has been advised that you will respond directly to them within 5 working days.
- 

Kind Regards

Customer Services

---

**\*\*\* THIS IS AN AUTOMATED EMAIL: This email address is unable to take replies \*\*\***

**Date and time of enquiry: 2020-03-02 22:01:07**

**From:** Tom Clarke  
**Sent:** 24 February 2020 16:34  
**To:** PlanningPolicy  
**Subject:** Consultation response - Theatres Trust  
**Attachments:** 20200224 Ipswich SAP Comments - Theatres Trust.doc; 20200224 Ipswich CS Comments - Theatres Trust.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good Afternoon

Please find attached representations on behalf of the Trust for the current Core Strategy and Site Allocations consultations.

Kind regards,

**Tom Clarke MRTP**  
National Planning Adviser

**Theatres Trust**  
22 Charing Cross Road, London WC2H 0QL

---

W [theatrestrust.org.uk](http://theatrestrust.org.uk)

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                               |                                                                                                                                                                                                                                                                                                   |
|---------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation document(s) to which this comments form relates: | <b>CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW– FINAL DRAFT</b>                                                                                                                                                                                                                   |
| Please return this comments form to:                          | <p><u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or</p> <p>Planning Policy Team<br/>       Planning and Development<br/>       Ipswich Borough Council<br/>       Grafton House<br/>       15-17 Russell Road<br/>       Ipswich<br/>       IP1 2DE</p> |
| Return by:                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                                                                   |
| This form has two parts:                                      | <p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>                                                                                                                                                                                                                   |

| <b>PART A PERSONAL DETAILS</b>               |                                                                                         |                                           |
|----------------------------------------------|-----------------------------------------------------------------------------------------|-------------------------------------------|
|                                              | <b>1. Personal details</b>                                                              | <b>2. Agent's details (if applicable)</b> |
| Title                                        | Mr                                                                                      |                                           |
| First name                                   | Tom                                                                                     |                                           |
| Last name                                    | Clarke MRTPI                                                                            |                                           |
| Job title ( <i>where relevant</i> )          | National Planning Adviser                                                               |                                           |
| Organisation ( <i>where relevant</i> )       | Theatres Trust                                                                          |                                           |
| Address<br><i>(Please include post code)</i> | 22 Charing Cross Road<br>London<br>WC2H 0QL                                             |                                           |
| E-mail                                       | <u><a href="mailto:planning@theatrestrust.org.uk">planning@theatrestrust.org.uk</a></u> |                                           |
| Telephone No.                                |                                                                                         |                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                                  |
|----------------------------------------------------------------------|----------------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Tom Clarke MRTPI, Theatres Trust |
|----------------------------------------------------------------------|----------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy DM28                    | <p>The Trust is supportive of this policy and the protection afforded to the borough's valued facilities. We would suggest a minor amendment to Appendix 6 to further improve its robustness reflecting comments we submitted at the previous stage. We suggest paragraph 2.2 requires applicants to market the property through recognised national, regional and local agents, websites and publications appropriate to the type of facility. This would prevent applicants undermining the policy objective by superficially addressing policy, for example listing with small agents in other parts of the country or listing commercial property with residential agents. We otherwise consider this policy to meet the tests of soundness.</p> |
|                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|
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IP1 2DE.

website:  
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|                                                               |                                                                                                                                                                                                                                            |
|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Consultation document(s) to which this comments form relates: | <b>SITE ALLOCATIONS AND POLICIES (INCORPORATING IP-ONE AREA ACTION PLAN) DEVELOPMENT PLAN DOCUMENT REVIEW – FINAL DRAFT</b>                                                                                                                |
| Please return this comments form to:                          | <u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or<br><br>Planning Policy Team<br>Planning and Development<br>Ipswich Borough Council<br>Grafton House<br>15-17 Russell Road<br>Ipswich<br>IP1 2DE |
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| First name                             | Tom                                                                              |                                    |
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| Document(s) and document part.                                                      | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                               |
|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Opportunity Area C – Mint Quarter / Cox Lane regeneration area and surrounding area | As articulated at the previous stage we are supportive of these plans and of enhanced linkages to the Regent Theatre. We consider this to meet the tests of soundness.                                                                                                     |
| Opportunity Area E – Westgate                                                       | We are also supportive of development at this site, although as set out previously we would encourage the principles to include engagement with the Trust given the potential for impact on New Wolsey Theatre. We otherwise consider this to meet the tests of soundness. |
| Policy SP15 Improving Pedestrian and Cycle Routes                                   | We are supportive of this policy and consider it to meet the tests of soundness.                                                                                                                                                                                           |
|                                                                                     |                                                                                                                                                                                                                                                                            |

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |

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## Felicia Blake

**From:** Matthew Sobic ·  
**Sent:** 02 March 2020 18:15  
**To:** PlanningPolicy  
**Cc:** Michael Hammond; Banks, Alice  
**Subject:** Ipswich Local Plan Review

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir or Madam,

We write on behalf of Threadneedle UK Property Authorised Investment Fund who is the owner of a significant area of Ipswich town centre between Tavern Street and Buttermarket.

We have been in discussions with Michael Hammond of your office over the drafting of Policy DM27 that relates to the 'Central Shopping Area'. We note that efforts have been made by the Local Planning Authority to reflect the representation submitted on behalf of Threadneedle and dated 5 August 2019, which take a step forward to allowing a greater flexibility of uses within the Central Shopping Area.

Whilst we consider that greater flexibility could be achieved within the wording of draft Policy DM27 to ensure future town centre vitality and viability, we understand that the Council will take a pragmatic approach to future applications that exceed the proposed thresholds depending on the situations faced by the retail market and this is embedded within the draft wording of Policy DM27.

However, and whilst we support the direction of travel that the Local Planning Authority is taking, we consider a very subtle change should be made to the policy position for the Primary Shopping Zones. Our subtle changes are underlined bold in the below text copied from draft Policy DM27 as follows:

*'The Council will not grant planning permission for the use of a ground floor unit to a use falling outside classes A1 to A5, D2 and G1 in Primary Shopping Zones...'*

D2 and C1 uses can contribute to the vitality and viability and mix of shopping areas and enable upper floors to be brought into use, but will require ground floor accesses. Such uses can provide active frontages and therefore should not be excluded from the operations permitted in the Primary Shopping Zone, which is subject to a threshold policy in any event.

We trust the above minor modification will be made and I would be grateful if you could confirm by return that it will be. The risk not making the above subtle change could be to result in vacant properties and underutilised space in the town centre that would otherwise contribute to its vibrancy.

I look forward to hearing from you.

Yours faithfully

Matt

Matthew Sobic

Director

Planning

Savills, Belvedere , 12 Booth Street , Manchester M2 4AW

Tel

Mobile :

Email :

savills Website : <http://www.savills.co.uk>



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Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**U**



This submission is confirmed

[26325]

**Support Site Sheets, Site Ref: IP355 (Policy SP2) Cullingham Road**

**Respondent: Universal Property Services Ltd (Mr Daniel Fermor, Director) [2564]**

**Received: 02/03/2020 via Web**

- 1)Positive re-use of a brownfield site, within a predominantly residential area.
- 2)The site will allow for a comprehensive and controlled re-development of the area including geographically linked sites IP279a, b(1) and b(2) – Former British Telecom Office, Bibb Way and IP003 Waste Tip at Sir Alf Ramsey Way all within close proximity to IP355.
- 3)The site will allow for cycle path aspirations linking the site to Bibb Way.
- 4)10m EA River corridor buffer zone will remove 50% of the site & render the site nonviable.
- 5)Higher density will need to be considered to ensure viability and linked aspirations.

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To be fully informed of impact on the proposed site.

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**W**



**Felicia Blake**

---

**From:** Cllr Sarah Barber  
**Sent:** 28 January 2020 17:14  
**To:** Martyn Fulcher  
**Subject:** local plan consultation

Dear Martyn,

Sally Wainman, /has contacted me directly to raise her concerns about the change to the local plan in Ravenswood off Alnesbourne Crescent. Sally is concerned that the new residents will put pressure on the resources off the local GP surgery.

Kind regards, Sarah

**Cllr Sarah Barber**  
IBC Cllr for Priory Heath ward  
Portfolio holder for the Town Centre  
07817286957

**From:** Chris Warhurst <  
**Sent:** 26 January 2020 12:18  
**To:** PlanningPolicy  
**Subject:** OBJECTION - Proposed Local Planning Site IP150d

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir

To whom it may concern,

**PROPOSED LOCAL PLANNING SITE ALLOCATION - IP150d (UC267)**

I have been made aware, through public notice that a proposed local planning site allocation (IP150d) is being considered. Having written to you on 2 separate occasions with regard to further development in this area, and had no response I find this particularly alarming.

I would like to formally state my objection to this proposed development on the following grounds.

**Environmental**

- Skylarks have been seen nesting on this area
- Bee orchids have been seen flowering in this area - which is protected under Section 13 of the Wildlife and Countryside Act (1981).

These are 2 rare and protected species. Building in this area

**Sustainability - Traffic Infrastructure**

The traffic connection at the main roundabout which provides the only access to and from the Ravenswood estate is beyond breaking point. Current residents experience over 30 min traffic jams getting in and out of the estate over the following periods:

- When access the Macdonalds restaurant is in high demand
- During school drop off times
- During school collection times
- During delivery times for Lidl supermarket - articulated trucks
- During delivery times for Macdonalds - articulated trucks
- Peak commuter times
- Any time the main roundabout is congestion

**Sustainability - Local Amenities**

- Local Doctors Surgery waiting times are excessive and beyond capacity
- Local Dental Surgery waiting times are excessive and beyond capacity
- School class sizes are excessive and beyond capacity

- Sewage capacity at Ravenswood is at capacity and requires upgrading
- Storm water runoff is at capacity - which has resulted in a number of local floods during high rainfall

Warmest Regards

Chris Warhurst

This submission is **confirmed**

[26290]

### Support Policy CS11 Gypsy and Traveller Accommodation

Respondent: [\*\*West Suffolk \(Forest Heath District Council and St Edmundsbury Borough Council\) \(Amy Wright\) \[2556\]\*\*](#)

Received: **02/03/2020 via Web**

This policy seeks to “provide for additional pitches... where sites cannot be found within the Borough, the Council will work with neighbouring authorities to secure provision”... This appears to be positively prepared. West Suffolk Council supports the provision of appropriate pitches to meet the identified need which will be secured through the policy.

**Representation at examination:** Written Representation

This submission is **confirmed**

[26291]

### Support Policy CS20 Key Transport Proposals

Respondent: [West Suffolk \(Forest Heath District Council and St Edmundsbury Borough Council\) \(Amy Wright\) \[2556\]](#)

Received: **02/03/2020 via Web**

“Key transport proposals needed to mitigate the traffic impacts within Ipswich of planned growth...” In order to be effective, it is suggested that criteria (i) is added, “improvements to the rail line.” This will enable matters such as the Ipswich to Cambridge rail line to remain a strategic priority. The East West Rail Eastern Section Group is actively working to increase passenger rail frequencies.

**Representation at examination:** Written Representation

**Felicia Blake**

---

**From:** Will Dowe  
**Sent:** 10 February 2020 21:00  
**To:** PlanningPolicy  
**Subject:** Alnesbourn Crescent Planning Proposal

Good afternoon

I am emailing to express my concern at the council's proposal to allow the grassland area adjacent to Alnesbourn to be used for housing.

This area of land borders an AONB which would be negatively affected by additional vehicular traffic in the area.

The existing access track to Bridge Wood/Orwell Meadows/Hallowtree Campsite is already in disrepair.

Additional traffic in the area would be at the detriment to the properties in the Alnesbourn Priory site.

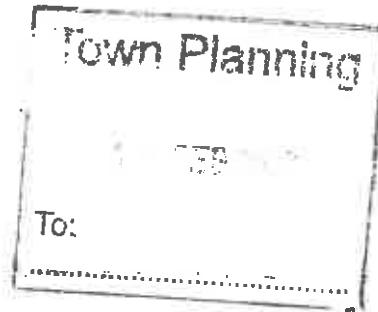
It is a short-sighted effort by the council to boost housing in an area which is unequipped to handle the additional capacity.

No work should be allowed to take place. The land must be kept undisturbed which will allow the flora and fauna to develop. This will bring far more value to the people living and working in that area.

Yours sincerely,

Will Dowe  
Hallowtree Scout Activity Centre

Ipswich Borough Council  
Planning and Development Department  
Grafton House  
15-17 Russell Road  
Ipswich  
Suffolk  
IP1 2DE  
February 12<sup>th</sup> 2020



Dear Sirs

Subject – Site ref IP354 – 72 (Old Boatyard) Cullingham Road Ipswich

With reference to the Proposed Local Plan Site Allocation Notice posted in connection to the above address, we would strongly object to the proposal to build 24 residences for the following reasons –

1) Traffic

Cullingham Road is built with mainly terraced houses which do not have off-road parking and therefore there are cars parked on either side of the road on a regular basis creating difficulty in access for large lorries and delivery trucks , even the refuse lorry has experienced problems in getting down the road when cars are parked haphazardly.

Any new housing being considered ,even allowing for the fact that presumably car parking would be factored into the new site, would add more additional parking problems to those which we already have , bearing in mind that these days more residences have two vehicles.

Additional traffic would also cause problems exiting Cullingham Road onto Handford Road as the "Keep Clear" sign which was painted onto the road by the Council has worn away and not been re-painted.

Car parking aside , there would be additional problems with demolition/construction vehicles being able to access the site safely ,due to the narrow entrance, adding yet more mayhem for the residents together with additional traffic pollution problems.

2) Wildlife disruption

The canal bank is home to a variety of wildlife including birds, waterfowl , squirrels and a family of foxes . We have even had a small deer wandering along the bank and as our flat in Elizabeth Court has a clear view along the canal bank , we have been

fortunate to enjoy watching all these. This would not be the case if a housing estate were to be built.

We need to encourage wildlife not effectively destroy their habitat by building an estate.

3) Health and Wellbeing

The site had previously been a machinery business which ,when the working day ended , would be closed and the area would be quiet . Having a housing estate right on our doorstep, which it would be as Elizabeth Court is surrounded on two sides by the site, would cause us noise and disruption.

We trust that our views will be taken into consideration during the public consultation period.

Yours faithfully

Mrs Carole Williamson

Mr Christopher Williamson



# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 26<sup>th</sup> February 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                                                            |
|----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <p><b>Ipswich Local Plan Review Final Draft Consultation</b></p> <p><b>Policy CS10 Ipswich Garden Suburb – Access &amp; Movement</b></p> <p><b>Improvements to Fennereau Way (north section to Lower Rd)</b></p>                                                                           |
| <b>Please return this comments form to:</b>                          | <p><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</p> <p>Planning Policy Team<br/>       Planning and Development<br/>       Ipswich Borough Council<br/>       Grafton House<br/>       15-17 Russell Road<br/>       Ipswich<br/>       IP1 2DE</p> |
| <b>Return by:</b>                                                    | <b>11.45pm Wednesday 26<sup>th</sup> February 2020</b>                                                                                                                                                                                                                                     |
| <b>This form has two parts:</b>                                      | <p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>                                                                                                                                                                                                            |

| <b>PART A PERSONAL DETAILS</b>                |                            |                                           |
|-----------------------------------------------|----------------------------|-------------------------------------------|
|                                               | <b>1. Personal details</b> | <b>2. Agent's details (if applicable)</b> |
| <b>Title</b>                                  | Mrs                        |                                           |
| <b>First name</b>                             | D                          |                                           |
| <b>Last name</b>                              | Wiseman                    |                                           |
| <b>Job title (where relevant)</b>             |                            |                                           |
| <b>Organisation (where relevant)</b>          |                            |                                           |
| <b>Address<br/>(Please include post code)</b> |                            |                                           |
| <b>E-mail</b>                                 |                            |                                           |
| <b>Telephone No.</b>                          |                            |                                           |

## PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

|                                                             |  |
|-------------------------------------------------------------|--|
| Your name or organisation (and client if you are an agent): |  |
|-------------------------------------------------------------|--|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| Table 8B<br>Access & Transport | <p>The purpose of Table 8B is to set a clear steer on what Infrastructure should be provided.</p> <p>Under Access &amp; Transport there is provision for Infrastructure improvements to Fonnereau Way (complete section linking railway line and Lower Road). It is not clear whether this provision relates to the exiting route as it currently is defined or whether this will be an amended route within the country park itself.</p> <p>This representation makes reference only to the section that cuts through the residential dwelling known as Broadacres.</p> <p>National Legislation relates directly in this regard.</p> <p>The National Planning Policy Framework states in Paragraph 58: that "Planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion", and Paragraph 69: states "Planning policies and decisions, in turn, should aim to achieve places which promote: Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life and community cohesion".</p> <p>Section 17 of the 'Crime and Disorder Act 1998' places a duty on Ipswich Borough Council 'to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all that it reasonably can to prevent crime and disorder in its area to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment'. This rationale is further endorsed by the content of PINS 953.</p> <p>In the SPD any planned enhancement to the Northern end of the Fonnereau Way at Broadacres would not meet the policies stipulated in the Crime and Disorder Act 1998 and the NPPF.</p> <p>As it stands, the existing way at Broadacres does not meet the policies stipulated in the Crime and Disorder Act 1998 and the NPPF and promotes opportunistic crime and anti-social behaviour. Crime and disorder occur because Broadacres is</p> |

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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|                                | <p>publicly accessible, has no defined perimeter fencing and the area is not overlooked meaning this is an isolated concealed home, that has already suffered unreasonable levels of crime and vandalism, all of which has been documented by Suffolk Police.</p> <p>The Suffolk Police Designing Out Crime Officer, in her letter to IBC in August 2016 stated that "To ensure that crime prevention is properly taken into account, it is important that the way in which permeability is provided is given careful consideration. High permeability is conducive to walking and cycling, but can lead to problems of anti-social behaviour if it is only achieved by providing routes that are poorly overlooked, such as rear alleyways." It is therefore important that footpaths and access points are kept to a minimum and are subject to maximum possible levels of natural (and formal if necessary) surveillance"</p> <p>The SPD Master Plan defines a proposed network of footpaths, part of which runs parallel to the section referred to above with an enhanced exit/entrance onto Lower Road. The proposed new entrance gives safer pedestrian access, including disabled access, will have defined perimeters, allow open natural surveillance and will lead directly into the park, meeting the policies defined in the NPPF and the Crime and Disorder Act 1998. This therefore provides an opportunity to phase out the route through Broadacres and eradicate the threat of increased crime, vandalism and anti-social behaviour because the route proposed remains solely within the confines of the Country Park and the policies on which that is created.</p> |
|                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
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**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|
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|                                      |                                                                                                                     |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Wednesday 26<sup>th</sup> February 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.

Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.

Adoption of the Ipswich Local Plan Review.

**PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the

creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.



Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**B**



Planning Policy Team  
Ipswich Borough Council

(sent via e-mail to  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk))

Please ask      Robert Hobbs  
for:  
Email:  
Direct line:  
Our  
reference:  
Your  
reference:

2<sup>nd</sup> March 2020

Dear Sir or Madam

**Regulation 19 consultation on Ipswich Local Plan Review Final Draft (January 2020)**

Thank you for consulting us on your Ipswich Local Plan Review Final Draft (January 2020). Babergh and Mid Suffolk District Councils have considered the Plan and have produced a joint response as attached focusing on key issues.

The Councils are pleased to see the Ipswich Local Plan making provision for housing growth which will contribute to the overall housing market area needs and are committed to cross boundary strategic planning across the Ipswich Strategic Planning Area, which covers the Ipswich Housing Market Area. Furthermore, Babergh and Mid Suffolk District Councils have signed an Ipswich Strategic Planning Area Statement of Common Ground (October 2019 – signed January 2020), with Ipswich Borough Council, East Suffolk Council and Suffolk County Council.

However, there are some areas of concern identified, in particular regarding policies CS2, CS7 and CS11 that the Councils wish to draw attention to. There are also areas of the Plan, that the Councils wish to express support.

Yours faithfully

Robert Hobbs  
Corporate Manager – Strategic Planning



Babergh and Mid Suffolk District Councils  
Endeavour House, 8 Russell Road, Ipswich IP1 2BX  
Telephone: (0300) 1234 000  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulation 19)**

## **Consultation Comments Form**

e-mail:

[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>Ipswich Borough Council Local Plan: Core Strategy and Policies Development Plan Document Review – Final Draft (January 2020)</b>                                                                                                                     |
| <b>Please return this comments form to:</b>                          | <b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b><br><br><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                         |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                                |

#### **PART A PERSONAL DETAILS**

|                                               | <b>1. Personal details</b>                                         | <b>2. Agent's details (if applicable)</b> |
|-----------------------------------------------|--------------------------------------------------------------------|-------------------------------------------|
| <b>Title</b>                                  | Mr                                                                 |                                           |
| <b>First name</b>                             | Robert                                                             |                                           |
| <b>Last name</b>                              | Hobbs                                                              |                                           |
| <b>Job title (where relevant)</b>             | Corporate Manager – Strategic Planning                             |                                           |
| <b>Organisation (where relevant)</b>          | Babergh and Mid Suffolk District Councils                          |                                           |
| <b>Address<br/>(Please include post code)</b> | Endeavour House<br>8 Russell Road<br>Ipswich<br>Suffolk<br>IP1 2BX |                                           |
| <b>E-mail</b>                                 |                                                                    |                                           |
| <b>Telephone No.</b>                          | -                                                                  |                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                                           |
|----------------------------------------------------------------------|-------------------------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Babergh and Mid Suffolk District Councils |
|----------------------------------------------------------------------|-------------------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.                         | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| Core Strategy Policy CS2 and supporting paragraph 8.58 | <p><b>Object to soundness of the Local Plan.</b></p> <p>Whilst Babergh and Mid Suffolk District Councils will work with Ipswich Borough Council and East Suffolk Council through the Ipswich Strategic Planning Area (ISPA) Board to address housing need and delivery within the Ipswich Housing Market Area (IHMA), the Councils object to the following statement as unsound:</p> <p><i>'Later in the plan period after 2031, the Council's housing land supply opportunities within the Borough boundary become more limited and, therefore, there will be a need to consider future development opportunities beyond the boundaries with the neighbouring local authorities, in association with the provision of significant infrastructure. Policy CS7 sets out the Borough's objectively assessed housing need.'</i></p> <p>All ISPA authorities in the Statement of Common Ground version 5 (October 2019 – signed January 2020) agree in paragraph C3 of the document that:</p> <p><i>'Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum number it is intending to deliver in its own area. Where, through the production of a Local Plan, it is evident that the need cannot be met within the local authority's boundary, a comprehensive re-assessment of land supply and deliverability will be undertaken'.</i></p> <p>Furthermore, as stated in paragraph C3:</p> <p><i>'Following a comprehensive re-assessment of land supply and deliverability, and where unmet need remains, the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan. An appropriate approach will be dependent upon the scale of unmet need and the current status of other Local Plans in the ISPA.'</i></p> |

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                | <p>Therefore, before an assumption is made that later in the plan period, housing land supply opportunities in Ipswich Borough will be limited, a comprehensive regeneration and asset strategy needs to be undertaken to exhaust all other options. For example, there are surface car parks in Ipswich Borough that could be redeveloped for housing or re-configured for multi-storey car parks making a more effective use of land. The emerging Ipswich Local Plan in policy CS5: Improving Accessibility, acknowledges the need to minimise the need to travel and to enable access safely and conveniently on foot, by bicycle and by public transport. Therefore, through measures contained in the Local Transport Plan and the Suffolk County Council Transport Mitigation Strategy, it should be possible to rationalise / make better use of the amount of car parking required in Ipswich.</p> <p>As stated in paragraph 8.96 of the emerging Ipswich Local Plan, '<i>The Local Transport Plan is under review and provides the opportunity for the next package of sustainable travel measures to be identified and implemented.</i>' Furthermore, paragraph 6.22 notes that town centre improvements will encourage modal shift to transport, cycling and walking.</p> <p>Paragraph 8.97 also notes the Council is developing a parking strategy to address the quantity and quality of car parking provision in the town, which we would have expected to have been produced before the assertion was made in paragraph 8.58 of limited housing land supply opportunities.</p> <p>Additionally, a comment was made to the previous Regulation 18 consultation in March 2019 undertaken by Ipswich Borough Council, where Babergh and Mid Suffolk District Councils sought a re-phrasing of paragraph 8.7 to clarify that whilst Ipswich Borough may be under-bounded, the Borough will meet its own identified housing needs with the Borough for this Plan. This paragraph remains unchanged. A similar amendment should be made to policy CS2 to acknowledge that local planning authorities within the Ipswich housing market area will plan to meet the needs of their own areas, which was our comment in March 2019, and which also has not been made. We note paragraph 8.11 does at least acknowledge the starting point for each authority will be to meet their own needs within their own boundary, however we request paragraph 8.7 and policy CS2 are amended accordingly.</p> |

|                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <b>Document(s) and document part.</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| Your name or organisation             | Babergh and Mid Suffolk District Councils                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Core Strategy Policy CS7              | <p>Object to soundness of the Local Plan.</p> <p>Policy CS7 states 'In order to boost delivery in Ipswich, the land supply will include a contingency of at least 10% over the housing requirement of 8010 dwellings. This excludes the Opportunity Sites identified through policy SP4.'</p> <p>This statement contradicts the text in paragraph 8.58:</p> <p><i>'Later in the plan period after 2031, the Council's housing land supply opportunities within the Borough boundary become more limited and, therefore, there will be a need to consider future development opportunities beyond the boundaries with the neighbouring local authorities, in association with the provision of significant infrastructure. Policy CS7 sets out the Borough's objectively assessed housing need.'</i></p> <p>Policy CS7 also states following identification of the housing requirement that <i>'The Council will, with its neighbours, keep this figure under review and consider any implications for meeting Ipswich need within the Ipswich Housing Market Area'</i>. Whilst it is correct the Ipswich Housing Market Area authorities discuss the housing requirement for each local planning authority in the IHMA through the ISPA Board, before considering any implications for not being able to meet need, the text in paragraph C3 of the ISPA Statement of Common Ground Version 5 (October 2019 – signed January 2020) needs to be adhered to. The text is quoted below:</p> <p><i>'Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum number it is intending to deliver in its own area. Where, through the production of a Local Plan, it is evident that the need cannot be met within the local authority's boundary, a comprehensive re-assessment of land supply and deliverability will be undertaken'.</i></p> <p><i>'Following a comprehensive re-assessment of land supply and deliverability, and where unmet need remains, the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan. An appropriate approach will be dependent upon the scale of unmet need and the current status of other Local Plans in the ISPA.'</i></p> |

| <b>Document(s) and document part.</b>                                                                                    | <b>Comment(s) (expand the boxes If necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Core Strategy Paragraph 2.15</b>                                                                                      | Support the spatial strategy for continued urban regeneration in central Ipswich and development of the Ipswich Garden Suburb and land at Humber Doucy Lane.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Core Strategy Policy CS10</b>                                                                                         | Support the delivery of homes at the Ipswich Garden Suburb and associated infrastructure, in particular the 1,200-place secondary school. It is essential that this secondary school is delivered alongside the housing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Core Strategy Policy CS11 and paragraph 8.141</b>                                                                     | <p>Object to soundness of the Local Plan.</p> <p>Object to wording in Paragraph 8.141 and Policy CS11.</p> <p>Whilst work is being undertaken with neighbouring authorities on short-stay provision within the Ipswich Strategic Planning Area as part of wider work in Suffolk, no contact has been made with Babergh and Mid Suffolk District Councils regarding permanent provision.</p> <p>It is identified that Ipswich Borough Council need to find 27 permanent pitches to 2036. Paragraph C4 of the ISPA Statement of Common Ground Version 5 (October 2019 – signed January 2020) states:</p> <p><i>'Each local planning authority will plan to meet its own need for permanent pitches for Gypsies and Travellers and should have a policy setting out how this will be delivered in its own area. Where the capacity to accommodate pitches cannot be met within the local authority's boundary a comprehensive re-assessment of deliverability will be undertaken and the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.'</i></p> |
| <b>Core Strategy Policy CS17 and paragraph 8.218.</b><br><br><b>Core Strategy Paragraph 8.207 supporting Policy CS16</b> | Support the collaborative working on the Recreational disturbance Avoidance and Mitigation Strategy (RAMS), although need to ensure that any RAMS contributions collected are spent to mitigate the impact from the development that has generated the need for the RAMS contribution.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

|                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Document(s) and document part</b>            | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                              |
| <b>Your name or organisation</b>                | Babergh and Mid Suffolk District Councils                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>Core Strategy Paragraph 8.240</b>            | <p><b>Object to soundness of the Local Plan.</b></p> <p>In respect of a 'Transport Mitigation Strategy' for the Ipswich Strategic Planning Area, this paragraph states: 'Detailed measures, costings and a mechanism for collecting the contributions from the planned growth will be determined through the ISPA Board'. Additional text needs to be added to also say, '... and to be agreed by each respective local planning authority'.</p> |
| <b>Core Strategy Paragraphs 8.249 and 8.250</b> | <p><b>Object to soundness of the Local Plan.</b></p> <p>Object to reference to an Ipswich Northern Route as this is no longer supported by Babergh or Mid Suffolk District Councils. However, appreciate that the decision by Suffolk County Council to not pursue funding for an Ipswich Northern Route was made after the emerging Ipswich Local Plan was published for consultation.</p>                                                      |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

#### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**  Yes

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**  Yes

**Adoption of the Ipswich Local Plan Review.**  Yes

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**From:** Emma GLADWIN .....  
**Sent:** 02 March 2020 20:39  
**To:** PlanningPolicy  
**Cc:** James Firth  
**Subject:** Regulation 19 Consultation - Representations on Behalf of Bloor Homes  
**Attachments:** Ipswich Reg 19 Reps - Bloor Homes, Rushmere.pdf; Ipswich Reg 19 Comment Form - Bloor Homes, Rushmere.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/Madam,

Please find attached representations on behalf of Bloor Homes in relation to the current Regulation 19 consultation for the Ipswich Local Plan Review Final Draft. I would be grateful if you could confirm receipt. Should you have any queries please do not hesitate to contact me.

Kind regards,

**Emma Gladwin**  
BSc (Hons) MSc MRPI  
Senior Planner  
Strutt & Parker, Coval Hall, Rainsford Road, Chelmsford, CM1 2QF  
Office: 01245 258201 |



**Development & Planning**

**STRUTT PARKER**  
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**Creating Sustainable Communities**

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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                            |
|----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>Core Strategy and Policies Development Plan Document Review &amp; Site Allocations and Policies Development Plan Document Review</b>                                                                                                    |
| <b>Please return this comments form to:</b>                          | <u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or<br><br>Planning Policy Team<br>Planning and Development<br>Ipswich Borough Council<br>Grafton House<br>15-17 Russell Road<br>Ipswich<br>IP1 2DE |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                            |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                   |

#### PART A PERSONAL DETAILS

|                                        | <b>1. Personal details</b> | <b>2. Agent's details (if applicable)</b>             |
|----------------------------------------|----------------------------|-------------------------------------------------------|
| Title                                  |                            | Miss                                                  |
| First name                             |                            | Emma                                                  |
| Last name                              |                            | Gladwin                                               |
| Job title ( <i>where relevant</i> )    |                            | Senior Planner                                        |
| Organisation ( <i>where relevant</i> ) | Bloor Homes                | Strutt & Parker                                       |
| Address<br>(Please include post code)  |                            | Coval Hall<br>Rainsford Road<br>Chelmsford<br>CM1 2QF |
| E-mail                                 |                            |                                                       |
| Telephone No.                          |                            |                                                       |

## PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

|                                                                      |                                               |
|----------------------------------------------------------------------|-----------------------------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Bloor Homes c/o Emma Gladwin, Strutt & Parker |
|----------------------------------------------------------------------|-----------------------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                 |
|--------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Policy CS7                     | We raise concerns over the lack of housing trajectory and no consideration of whether the housing figure should be uplifted to meet economic growth resulting in the Plan being ineffective, not positively prepared and unjustified. For our full representation please refer to the accompanying document.                                                                                                 |
| Policy CS12                    | We raise concerns about the full affordable need not being met, with no consideration of uplifting the housing figure or allocating additional sites. This is therefore not positively prepared, justified, effective or consistent with national policy. For our full representation please refer to the accompanying document.                                                                             |
| Policy CS8                     | We raise concerns that despite Policy CS8 setting out the types of housing needed, the strategy within the Plan does not seek to meet this need and instead allocates a large proportion of sites for high density smaller flats. This is therefore not positively prepared, justified, effective or consistent with national policy. For our full representation please refer to the accompanying document. |
| Sustainability Appraisal       | The spatial strategy chosen in the Plan is not tested in the Sustainability Appraisal and the scoring provided to some of the options that are tested is not consistent or fully justified. The Sustainability Appraisal contains significant flaws that render the Plan unsound and not currently legally compliant. For our full representation please refer to the accompanying document.                 |

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |

**Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.**

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Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

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BNP PARIBAS GROUP

# **Ipswich Core Strategy and Policies Development Plan Document Review & Site Allocations and Policies Development Plan Document Review Reg 19 Representations**

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**Humber Doucy Lane, Rushmere St Andrew**

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**Prepared on behalf of Bloor Homes**

**March 2020**

---

Humber Doucy Lane, Rushmere St Andrew

---

|                 |                                                             |
|-----------------|-------------------------------------------------------------|
| Site Name:      | Humber Doucy Lane, Rushmere St Andrew                       |
| Client Name:    | Bloor Homes                                                 |
| Type of Report: | Ipswich Reg 19 Representations                              |
| Prepared by:    | Emma Gladwin BSc (Hons) MSc MRTPI<br>Sam Hollingworth MRTPI |
| Approved by:    | Andy Butcher Dip TP MRTPI                                   |
| Date:           | March 2020                                                  |

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## APPENDICES

- Appendix A    Site Location Plan
- Appendix B    Development Framework Plans
- Appendix C    Suffolk Coastal Hearing Statements on Behalf of Bloor Homes
- Appendix D    Site Allocations Plan
- Appendix E    Highways Technical Note
- Appendix F    Sustainability Appraisal Concerns

## 1.0 Introduction

- 1.1 This representation is submitted by Strutt & Parker on behalf of Bloor Homes to respond to the Regulation 19 consultation on the Ipswich Core Strategy and Policies Development Plan Document Review & Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review (the Local Plan).
- 1.2 Bloor Homes are promoting land at Humber Doucy Lane, Rushmere St Andrew, (the Site) as shown on the Site Location Plan at Appendix A. The land is situated within both the Ipswich Borough and East Suffolk (formerly Suffolk Coastal) District.
- 1.3 The overall Site is approximately 115 hectares in size. It presents both a shorter term opportunity for a smaller scheme and a medium-long term opportunity for a larger scale Garden Village development. Development Framework Plans are included at Appendix B indicating how the Site could be developed.
- 1.4 Representations have been submitted to the Issues and Options stage in 2017 and the Preferred Options stage in 2019.
- 1.5 With a large portion of the Site being in East Suffolk District, representations on behalf of Bloor Homes have also been made to the currently emerging Suffolk Coastal Local Plan, including attendance at Examination. Concerns were raised in relation to the cross boundary approach of working with Ipswich Council and the Site was promoted for a large scale opportunity. The relevant Hearing Statements are included at Appendix C.
- 1.6 In relation to the current consultation, being a Regulation 19 consultation, this representation is made with regard to the tests of soundness which a Local Plan must satisfy as set out at paragraph 35 of the National Planning Policy Framework (NPPF). As set out, we do not consider that the current Local Plan is positively prepared, justified, effective or consistent with national policy.

## **2.0 Housing Need**

- 2.1 The emerging Local Plan sets out that the total housing need under the standard method is at least 8,010 new dwellings between 2018 and 2036. The Local Plan seeks to meet this need and provide 9,500 additional new jobs, as set out in objective 2 of the Local Plan.
- 2.2 Given that the border of Ipswich is drawn very tightly around the developed area, it does present challenges for the Council which are recognised in the emerging Local Plan. Paragraph 8.7 of the emerging Plan sets out that choices about directions for growth at the edge of Ipswich within the Borough boundary are limited, and that a cross boundary approach is the starting point to ensure that development required to meet local needs is provided in a planned and coordinated way, in the right locations, and creates successful places.
- 2.3 We support the recognition within the Plan that the Council will need to work closely with neighbouring authorities regarding future development and infrastructure, as set out in the first strategic objective.
- 2.4 However, as expanded upon below we do not consider that the Council have fully explored all opportunities to work with neighbouring authorities to meet full identified housing needs throughout the Plan period as a whole, as also set out in response to the Suffolk Coastal emerging Local Plan (refer to Appendix C).

### **Policy CS7: The Amount of New Housing Required**

- 2.5 Within Policy CS7, the Council state that the housing requirement will be stepped to reflect when delivery of the Ipswich Garden Suburb is expected to take place.
- 2.6 The Council propose a housing target of 300 dwellings per annum (dpa) for the first six years, increasing to 518 dpa for the remainder of the Plan period, with the majority of this to be delivered through the Ipswich Garden Suburb.
- 2.7 A housing trajectory does not appear to have been published as part of the Local Plan or within the evidence base, so it is unclear whether the approach of the stepped

trajectory is justified or if a greater amount of housing could be delivered in the early part of the Plan period. A housing trajectory is a key part of a Local Plan in identifying if sufficient housing will come forward over the Plan period. It allows the Council, and all other parties, to identify if there are any parts of the Plan period where the delivery of housing might be less than the identified need. Without the trajectory, the rate of delivery simply cannot be known. This is a significant failure of the current Plan and renders it ineffective.

- 2.8 The Site promoted by Bloor Homes can deliver a smaller scale housing development of around 200 homes within the first part of the Plan period, subject to joint working with East Suffolk Council, and could assist in providing a higher level of delivery. Without full consideration of this and working together with the neighbouring authorities to increase delivery, the current approach of the stepped trajectory has not been justified and is unsound.
- 2.9 Furthermore, given the reliance of the Local Plan on the Ipswich Garden Suburb to meet housing need, if it is delayed, housing delivery in Ipswich will be significantly reduced compared to what is currently anticipated. If the stepped trajectory is adopted, this under delivery in the early part of the Plan period will not be rectified for a longer period of time, with housing need continually not being met.
- 2.10 In order for the proposed strategy to be justified and effective, the full housing trajectory should be made available and the Council should consider other opportunities to meet a greater amount of housing need within the early part of the Plan period and reduce reliance on the Ipswich Garden Suburb in the medium and long term.
- 2.11 We would further question the overall housing requirement and whether the Council have adequately considered whether this should be uplifted to support economic growth.
- 2.12 Paragraph 8.168 of the Local Plan sets out the Council have selected an ‘aspirational but deliverable’ jobs target of 9,500 jobs, due to the lower levels of housing growth under the standard method and the reduction in jobs forecast in the 2017 EEFM. This strongly suggests the Council have taken the standard method for housing need as a given without considering any uplift to support economic growth.

2.13 Paragraph 35 of the NPPF is clear that the standard method is a minimum target, which can be increased if desired by the Council. Increasing the housing need to support economic growth is a justified approach, which the Council do not seem have considered. In not considering such an uplift, the Local Plan is not fully positively prepared and may frustrate economic growth.

#### **Policy CS12: Affordable Housing**

- 2.14 The Council recognise early in the Local Plan that affordable housing is a key issue, as set out in Table 2 of the Plan, which identifies that Ipswich has the highest affordable housing need within the Housing Market Area (HMA).
- 2.15 The Strategic Housing Market Assessment (SHMA) 2017 identified a need of 239 affordable dwellings per year. The emerging Local Plan sets out that this represents around 50% of the total need identified through the standard method, with paragraph 8.151 further recognising that development viability is challenging in Ipswich.
- 2.16 To seek to meet this affordable housing need, Policy CS12 seeks ‘at least 15%’ affordable housing provision on sites for 15 houses or more (or sites more than 0.5 ha), and 30% on Ipswich Garden Suburb and at the northern end of Humber Doucy Lane.
- 2.17 However, based on the affordable percentages and housing allocated in the plan, a total of 1,647 affordable dwellings would be provided (assuming 30% on the Garden Suburb and Humber Doucy Lane and 15% on all other sites including windfall). In all likelihood this is overly optimistic given that most windfall sites are likely to be small and fall below the threshold set in Policy CS12, as recognised within Policy CS7.
- 2.18 Based on the need of 239 dwellings per year set out in the SHMA, this would result in 38% of the affordable need having been met over the Plan period.
- 2.19 This does not provide sufficient provision for affordable housing as per paragraph 20 of the NPPF, which specifies that strategic policies should make sufficient provision for housing, including affordable housing.

- 2.20 In addition, contrary to the Planning Practice Guidance (PPG), there does not appear to be any consideration of whether to uplift the housing requirement or seek to provide a greater level of housing to assist in meeting this affordable shortfall. The PPG is clear that ‘an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes’<sup>1</sup>.
- 2.21 As such, the strategy of meeting affordable housing need within the emerging Local Plan is not positively prepared, justified as an appropriate strategy, effective or consistent with national policy.
- 2.22 We consider the Council should have taken the opportunity to consider if any other sites could come forward over the Local Plan period to assist with meeting affordable housing need. The Site at Humber Doucy Lane, as promoted by Bloor Homes, can come forward to provide market and affordable housing.
- 2.23 There is an opportunity for a shorter term smaller scale development of around 200 houses, with a larger scale development in the medium term, with the potential for approximately 1,200 further dwellings. We recognise that with the majority of land being in East Suffolk, there will need to be a cross boundary approach from both Councils to deliver such schemes. We therefore encourage both Councils to work proactively with one another, as also set out in responses to the emerging Suffolk Coastal Local Plan (Appendix C).
- 2.24 Such a development could therefore deliver a significant amount of new market and affordable housing. Whilst the majority of the Site is located within the administrative boundary of East Suffolk Council, Ipswich is very constrained regarding future growth and both Councils should work together to deliver this additional housing to seek to meet more of the affordable housing need arising from Ipswich.
- 2.25 Such an approach would be more consistent with paragraph 26 of the NPPF, which states Council should work together, with particular reference to whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

---

<sup>1</sup> Reference ID: 67-008-20190722

### **Policy CS8: Housing Type and Tenure**

- 2.26 Policy CS8 seeks a diverse range of housing tenures to support the creation of mixed and balanced communities. In principle this is in accordance with national policy, with the NPPF being clear from the outset that sustainable development includes 'ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations' (paragraph 8). The PPG also includes a specific section on addressing the need for different types of housing and is clear that the standard method identifies an overall minimum average housing figure, but does not break this down into the needs of different groups.<sup>2</sup> The PPG therefore provides guidance on assessing the housing needs for various different groups.
- 2.27 The supporting text to Policy CS8 sets out that the SHMA identified that the greatest need for market housing is at least 3 bedrooms, with paragraph 8.121 stating that central sites should be high density containing a higher proportion of flats; sites in, or close to, district centres should be medium density with a mix of flats and houses or town houses; and sites elsewhere should be low density with a higher proportion of houses.
- 2.28 Despite Policy CS8 seeking a mix of housing to meet the identified needs, the site allocations identified do not appear to meet this intention, as set out below, contrary to national policy.
- 2.29 The emerging Local Plan seeks to provide allocations for an additional 6,100 homes, based on 1,910 homes already being under construction, with planning permission or a resolution to grant. Of the allocations, 2,750 are to be provided on sites as set out in the Site Allocations and Policies Development Plan Document (DPD).
- 2.30 A review of the allocations within the DPD identifies the total number of dwellings compared to the stated density as follows:

| Density           | Number of Dwellings | % of Dwellings |
|-------------------|---------------------|----------------|
| High (over 90dph) | 1,672               | 61             |
| Medium (40-90dph) | 710                 | 26             |
| Low (below 40dph) | 368                 | 13             |

---

<sup>2</sup> Reference ID: 67-001-20190722

- 2.31 As shown above, 61% of dwellings proposed within the DPD are at a high density. As recognised in paragraph 8.121 of the Local Plan, these will be primarily flats. They are likely to be 1 and 2 bedroom flats given the densities proposed and to meet the overall number of houses proposed on these sites. With such a high number and proportion of the dwellings being flats, there is a risk that the market becomes over saturated with smaller flats.
- 2.32 With only 13% of dwellings to be low density and predominantly houses, we question if this will meet the actual housing mix identified in qualitative terms as well as simply meeting the overall need figure.
- 2.33 Whilst Ipswich Garden Suburb and the allocation north of Humber Doucy Lane could deliver more of a mix of houses, these are not expected to start delivering houses until at least 2024. Without sites to provide needed family housing coming forward earlier in the Plan period, there is the potential for an under-delivery of the homes needed which is not positively prepared, justified, effective or consistent with national policy and renders the emerging Local Plan unsound in this regard.
- 2.34 Paragraph 61 of the NPPF is clear that “the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies”. Paragraph 61 gives examples of different groups, including those who require affordable housing, families with children and older people. As set out, the emerging Local Plan is not currently consistent with paragraph 61 of the NPPF as the policies within it do not reflect the type of housing needed for different groups in the community
- 2.35 As set out above, the Site promoted by Bloor Homes at Humber Doucy Lane can deliver housing in the short and medium term subject to joint working between Ipswich and East Suffolk Councils. This can be a mix of housing, including houses with 3 or more bedrooms to meet the identified needs within Ipswich. Allocating the Site for this purpose and committing to working with East Suffolk Council to bring forward the larger part of the Site would assist in overcoming the soundness issue identified as it would seek to meet the identified needs of the area.

### **3.0 The Context for Growth in the Ipswich Strategic Planning Area, and Cross-Boundary Development**

- 3.1 As noted earlier within this representation, given that the administrative boundary of Ipswich Borough constrains the existing town, it is of critical importance that the Local Plan be based on effective joint working with neighbouring authorities.
- 3.2 It is recognised that the four authorities which comprise the wider Ipswich Housing Market Area are progressing joint work through the Ipswich Strategic Planning Area Board (formerly the Ipswich Policy Area) on the strategic cross-boundary issues affecting the four authorities.
- 3.3 This was a matter which was recognised in 2017 in the Inspector's Report on the now adopted Ipswich Local Plan, in which the Inspector stated:

*"Given my concerns about the robustness of the 13550 OAN there is an urgent need for the Council to work with its neighbouring authorities to produce a fit-for-purpose objective assessment of need for new housing for the Ipswich Housing Market Area. This conclusion is consistent with my Interim Findings published in April 2016 following the initial Examination hearings but also has regard to the subsequently-published 2014-based household projections. Thus, and in line with the Memorandum of Understanding detailed in the assessment of the Duty to Cooperate, MM4 - MM6 (policies CS6 and CS7) commit the Council to working with its neighbours to prepare an updated OAN for housing for the HMA as a whole, a strategy for the distribution of it between the constituent districts and the adoption of joint or aligned local plans to deliver this by 2019. These modifications are thus necessary for the soundness of the plan..." (paragraph 28).*

*"However, the Council contends that appropriate, available and deliverable housing sites within Ipswich itself would only deliver 9777 dwellings during the plan period. Whilst with reference to specific sites there is some challenge to this figure, there is nothing to give confidence that substantially more than this number of dwellings can be delivered in the town to 2031. Based on all that I have read and heard, considered in the round and notwithstanding the 2014-based household projection figure, I conclude that it is highly likely that the forthcoming work will identify that the OAN*

*for Ipswich for the period to 2031 is at least equivalent to the 9777 dwellings which the Council contends can be delivered in this period” (paragraph 29).*

- 3.4 The four authorities have prepared a Statement of Common Ground (2018) ('the SoCG') which recognises *inter alia* the potential for cross boundary development to meet needs. Section D of the SoCG (titled 'Consideration of bordering strategic housing development) includes the following statement:

*“Due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich Borough boundary”.*

- 3.5 The Site clearly falls into the category of a potential cross-boundary opportunity (Ipswich Borough and East Suffolk (formerly Suffolk Coastal)) for development.
- 3.6 The Suffolk Coastal Local Plan is very advanced, having undergone examination and with the Examination Inspector having written to the Council on 31<sup>st</sup> January 2020 to confirm that, subject to main modifications identified, the Local Plan was “likely” to be found sound and legally compliant.
- 3.7 The submitted Suffolk Coastal Local Plan Key Diagram identifies an area to the east of Ipswich ('East of Ipswich') as a Major Centre. The Site is clearly commensurate with the East of Ipswich Major Centre.
- 3.8 Policy SCLP3.2 of the submitted Suffolk Coastal Local Plan confirms that Major Centres are at the top of the District's settlement hierarchy and that 'East of Ipswich' includes Kesgrave, Martlesham Heath, Brightwell Lakes, Purdis Farm, and Rushmere St Andrew (excluding village).
- 3.9 Notwithstanding the identification of the East of Ipswich as a Major Centre in the emerging Suffolk Coastal Local Plan, it only allocates one site ('Land at Humber Doucy Lane' (Policy SCLP12.24)) for residential development within this area.

- 3.10 The emerging Suffolk Coastal Local Plan's ability to effectively address Ipswich's housing needs through cross-boundary development was a matter of concern raised through the examination process. In particular, there was concern in respect of Policy SCLP2.1 ('Growth in the Ipswich Strategic Planning Area') and whether this would be effective in ensuring development needs would be sustainably met, where this involved cross-boundary cooperation. In the Examination Inspector's post-hearing letter of 31<sup>st</sup> January 2020, he suggested that Policy SCLP2.1 of the emerging Local Plan should be amended to make clear that an immediate review of the plan would be undertaken in the event that there was an unmet need arising in a neighbouring area, acknowledging the potential for such an issue to arise.
- 3.11 The emerging Ipswich Local Plan aligns with the Suffolk Coastal Local Plan in that both identify the general location of the Site as sustainable for growth. However, when one considers the detailed strategy and allocation of both the emerging Local Plan for Ipswich and that of the Suffolk Coastal Local Plan, it is clear that the plans are not as joined up as they may ostensibly appear.
- 3.12 Appendix D shows the proposed allocations in the emerging Local Plans of Ipswich and Suffolk Coastal in the East of Ipswich area. This suggests a lack of a coordinated approach, with allocations proposed within Ipswich Borough including those which abruptly terminate at the administrative boundary.
- 3.13 We remain concerned that the spatial strategy has been unduly influenced by the administrative boundary, exemplified by the January 2020 Strategic Housing and Economic Land Availability Assessment (SHELAA) having only assessed the element of the Site that lies within Ipswich Borough. A sustainable and deliverable opportunity to facilitate growth of Ipswich through development of the Site has been overlooked and rejected without justification.

#### **4.0 The Site – Land at Humber Doucy Lane**

- 4.1 As set out above, the Site at Humber Doucy Lane is being promoted by Bloor Homes for a residential development.
- 4.2 The Site measures in total approximately 115 ha, but can be divided into two separate areas – one to the south of Lamberts Lane (approximately 13.5 ha) and the other much larger parcel of land to the north. The residential development of the Site could be phased, and the smaller parcel brought forward earlier and independently from the larger parcel, if required. This smaller parcel clearly has strong potential to form an extension to existing residential areas within Ipswich and form an extension to the existing community.
- 4.3 The current allocations to the north east of Ipswich under Policy ISPA4 follow the administrative boundary of Ipswich, which does not follow any distinctive features on the ground. The boundary is purely arbitrary and having development simply follow this does not create a logical pattern of development. It is noted that within the emerging Suffolk Coastal Local Plan, a site is allocated for residential development under Policy SCLP12.24, but this will leave the arbitrary boundary. This is demonstrated on the map in Appendix D.
- 4.4 The Site has the potential to help meet housing needs within a location (East of Ipswich) which has already been tested through the plan-making process (the Suffolk Coastal Local Plan) and found to be a sustainable location for growth, as a more urbanised area. It would form a logical extension to Ipswich, the largest centre in the housing market area, in which there is a substantial range of facilities, services and employment opportunities.
- 4.5 With Ipswich being such a key centre for the Suffolk area, the Council should be ambitious to seek to ensure its long term success. Additional growth can support Ipswich town centre and help its longevity as a prosperous centre.
- 4.6 The Site can deliver approximately 200 homes in the shorter term on land partly within the Ipswich administrative boundary, and can deliver a further approximately 1,200 homes in the medium term on land within the administrative boundary of East Suffolk Council.

- 4.7 As set out in the Highways Technical Note at Appendix E, this level of growth can be delivered via an access from Humber Doucy Lane.
- 4.8 Objective 6 of the emerging Local Plan is to improve transport and connectivity within the Ipswich area. The Ipswich Northern Relief Road has been proposed and explored as one potential option for achieving this, with the proposed inner route partly crossing the land within Bloor Homes' control.
- 4.9 As confirmed in the Highways Technical Note at Appendix E, the development of the Site can be delivered both with and without delivery of the Northern Relief Road. Whilst we understand that Suffolk County Council are not proceeding with the next stage of the business case into the Northern Relief Road, as confirmed at the Cabinet meeting on 25<sup>th</sup> February 2020, should this change in the future, the proposed Site can assist in the delivery of the Road. With Bloor Homes controlling a large part of the land to the north of Humber Doucy Lane, it is uniquely placed to be able to assist in the delivery of a relief road if required in the future.
- 4.10 Further to the above, we note that Policy ISPA2 of the emerging Local Plan (which sets out the Council's strategic infrastructure priorities and a commitment to working with other partners to support and enable the delivery of key strategic infrastructure) states the Council support work to investigate the feasibility of an Ipswich Northern Route, with supporting text 8.19 referring to a strong preference for the inner route, which crosses the site. It sets out that the next review of the Local Plan will consider the implications of any decision about the route in more detail, including the extent to which the options must support potential future housing and employment growth. The principle of such approach is supported, but in order for the policy to be effective, it is important that the spatial strategy helps facilitate such objectives rather than to undermine their delivery.
- 4.11 Development at the Site can deliver new market and affordable homes, alongside new community facilities including local centres, employment and education. Significant areas of new open space and new planting can also be provided.
- 4.12 As set out, a first phase of development can be provided in the short term to assist with the delivery of both market and affordable housing. This is particularly pertinent given that the Council are proposing a stepped trajectory with a lower requirement in the

early part of the Plan period. Allocating the site for development and committing to working with East Suffolk Council would be a positive and proactive approach to seeking to meet housing need in both the short and medium term.

- 4.13 We note that 1.57ha of the site within the boundary of Ipswich Borough was considered in the January 2020 SHELAA, and was found not to be currently developable. It is notable that the Site scored green and amber in relation to the constraints and impacts considered in the SHELAA, with none red. The site was found not to be suitable and achievable due to the need to retain the separate identity of Rushmere village, and if drainage, access and infrastructure constraints could be overcome.
- 4.14 We do not consider this assessment of the Site to provide robust justification for its rejection as a residential development site.
- 4.15 As set out in the Highways Technical Note at Appendix E, suitable access can be achieved from Humber Doucy Lane and it is considered the Site could be developed without having an adverse impact on the wider highway network. As shown on the Indicative Masterplan Framework at Appendix B, the Site can be drained by sustainable drainage methods. The drainage, access and infrastructure constraints mentioned in the SHELAA can be overcome and are not constraints to development.
- 4.16 In terms of the need to retain the separate identity of Rushmere village, open space can be provided within the wider Site to ensure there are no concerns of coalescence. As shown on the Indicative Masterplan Framework, the wider Site can provide significant areas of open space in the form of a community orchard, SuDS ponds, meadow parkland, sports pitches and so on, with significant amounts of new planting. The site can therefore protect the separate identity of Rushmere and ensure there is no coalescence with Ipswich.
- 4.17 We also note that the SHELAA does not consider the wider site promoted by Bloor Homes. Although only 1.57ha of the site lies within the administrative boundary of Ipswich, this is an arbitrary boundary that does not necessarily relate to any demarcations on the ground.
- 4.18 As set out elsewhere in these representations, the Ipswich administrative area is very constrained in terms of its boundary, and with there being a high unmet affordable

housing need and concerns about the housing mix and proposed delivery within the emerging Local Plan, the Council should be looking at all opportunities to provide additional housing.

- 4.19 Given the constraints of the Ipswich boundary, the Council should be looking to neighbouring authorities to assist. Land at Humber Doucy Lane is one such area where there is a sustainable and suitable option for cross boundary development. The Council should therefore have considered this option within the SHELAA to ensure all options have been explored and the approach is positively prepared.
- 4.20 We do not consider the Site has been subject to a robust assessment, and this has resulted in a sustainable option for growth for Ipswich being rejected without justification.

## 5.0 Sustainability Appraisal

- 5.1 The preparation of a Sustainability Appraisal to inform the Local Plan is a legal requirement, as per the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations').
- 5.2 The emerging Local Plan is accompanied by a Sustainability Appraisal ('the SA/SEA'). However, we have concerns with the SE/SEA and the approach to assessing the Spatial Options.
- 5.3 Appendix F sets out our full concerns. In summary, the SA has not considered the spatial strategy actually set out in the Local Plan. An option has been assessed which the Council consider to be close to the spatial strategy chosen, but they are different.
- 5.4 Furthermore, Spatial Option 2 in the SA considers increasing development beyond the Borough boundary. As set out in Appendix E, we have numerous concerns with some of the assessment of Spatial Option 2 and how the scoring has been derived. Overall it appears that Spatial Option 2 has been scored much more poorly than it should have, leading to a worse overall assessment of the option.
- 5.5 It appears that Spatial Option 1, the option most closely aligned with the spatial strategy in the Local Plan, has been scored unjustly positively in some areas, and Spatial Option 2 has been scored more poorly.
- 5.6 A such, the SA prepared alongside the emerging Local Plan does not provide the necessary justification of the proposed spatial strategy.
- 5.7 To rectify this issue of soundness, the SA should be updated to address the above and the Council should subsequently review whether the strategy proposed is suitable and whether the reason for rejecting alternatives is still applicable.

## 6.0 Conclusion

6.1 The Site subject to this representation provides both a shorter term and medium term opportunity for new housing to meet identified needs alongside other infrastructure, open spaces and new planting. Ipswich and East Suffolk Councils should both work positively together to bring such a development forward.

6.2 It is submitted that the Local Plan is not positively prepared, justified, effective or consistent with national policy for the following reasons:

a) The Plan has not been Positively Prepared

The Plan fails to fully address the cross-boundary opportunities for providing sustainable patterns of growth in the Plan period. Such an approach and strategy would clearly be of benefit to both Ipswich and East Suffolk.

With the lack of a housing trajectory having been published, it is unclear whether the Plan does meet identified needs over the Plan period or if there are any times when housing delivery is expected to reduce below the need. The proposed stepped trajectory under Policy CS7 suggests there are concerns with regard to consistently meeting the full housing need.

The proposed strategy does not provide sufficient affordable housing to meet the full identified needs, with there not appearing to be any consideration of whether to uplift the housing target to meet more of this need. This is highlighted within Policy CS12.

b) The Plan is not Justified

Policies CS7, CS12 and CS8 raise concerns in this regard, as the chosen strategy does not seek to provide sufficient affordable housing or the housing that is needed within Ipswich, i.e. 3-bed houses rather than 1-bed flats. Concerns are also raised in relation to the SA, as set out in full in Appendix E, which does not appear to appropriately assess the Spatial Options presented.

c) The Plan is not Effective

As set out, we do not consider that the Local Plan is effective in working with neighbouring authorities on cross boundary opportunities to deliver sufficient housing of the type and tenure to meet the identified needs.

d) The Plan is not Consistent with National Policy

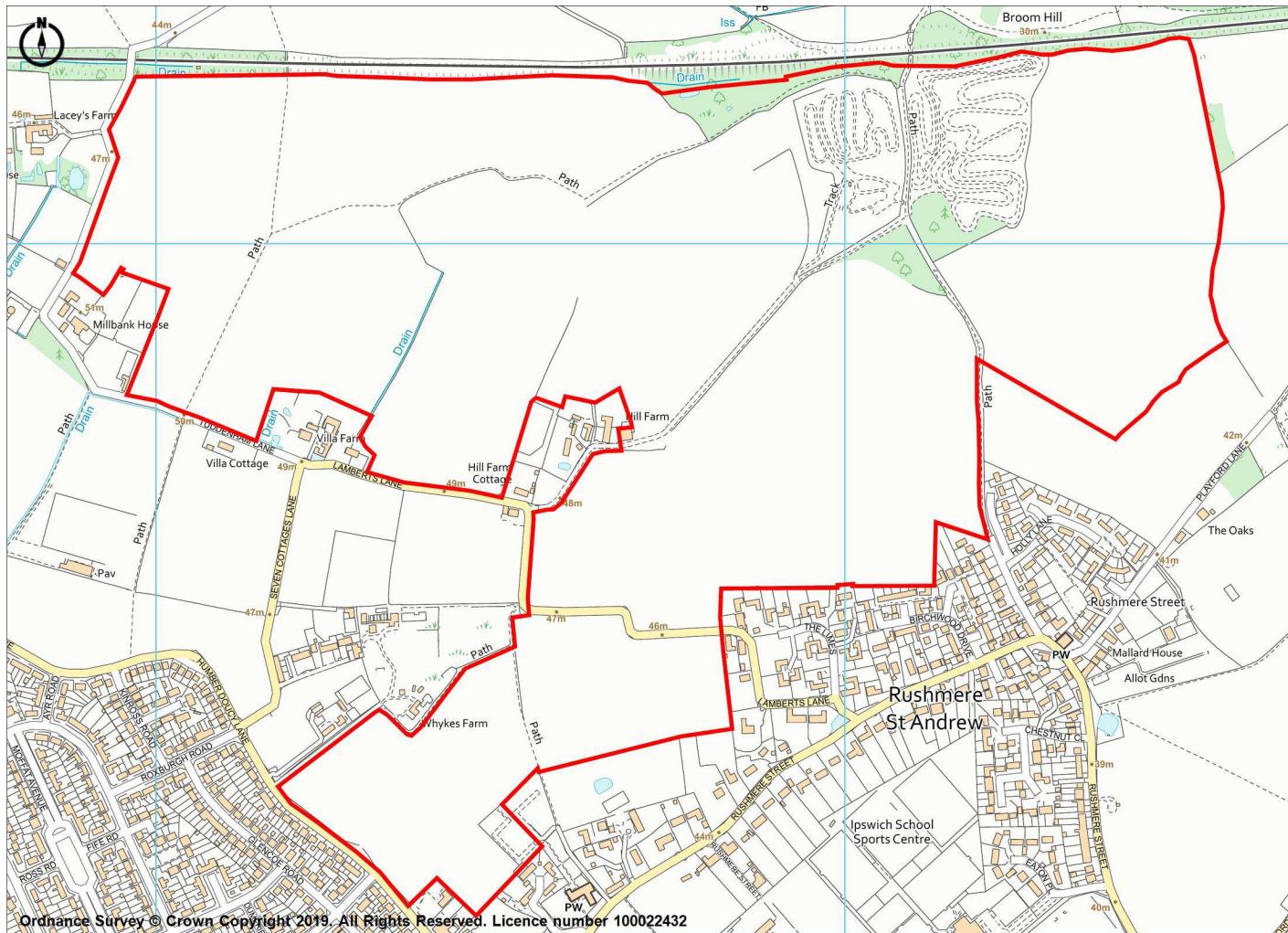
Given the failures of the Plan to provide the type of housing that people within the Borough need, provide sufficient affordable housing and adequately work with neighbouring authorities, it is not fully consistent with national policy.

- 6.3 We consider that the Council should take the opportunity to work with East Suffolk Council to identify and deliver a cross boundary development to provide housing to meet identified needs across the Plan period. At the minimum, the Council should include a commitment to an early review of the Plan if unmet needs are identified.

## **Appendices**

## **Appendix A**

## Site Location Plan - Rushmere St. Andrews, Humber Doucy Lane



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Licence number 100022432  
Plotted Scale - 1:10000. Paper Size - A4



## **Appendix B**



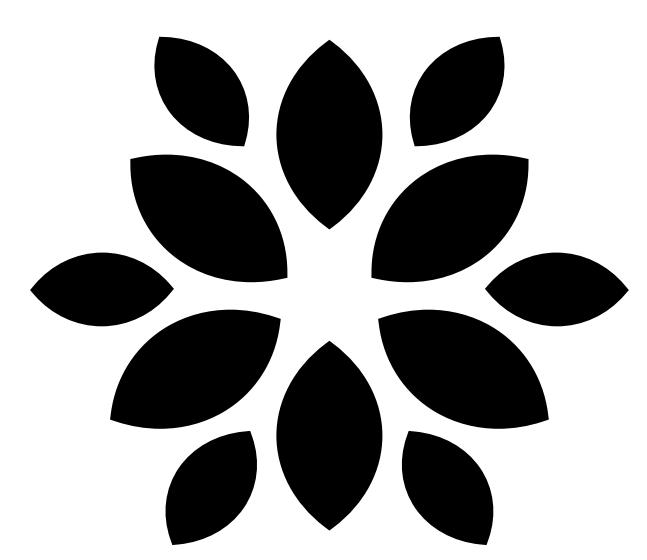
N  
Considerations

- Red line
- Railway
- A - Road
- B - Road
- Minor road
- Track on site

- Public Right of Way
- Downward slope
- Noise pollution
- Required junction improvement
- Required road improvement
- Potential cycle lane
- Local authority boundary

- Contours (5M)
- Priority habitat - deciduous woodland
- Rushmere MX track
- Listed building
- Orchard

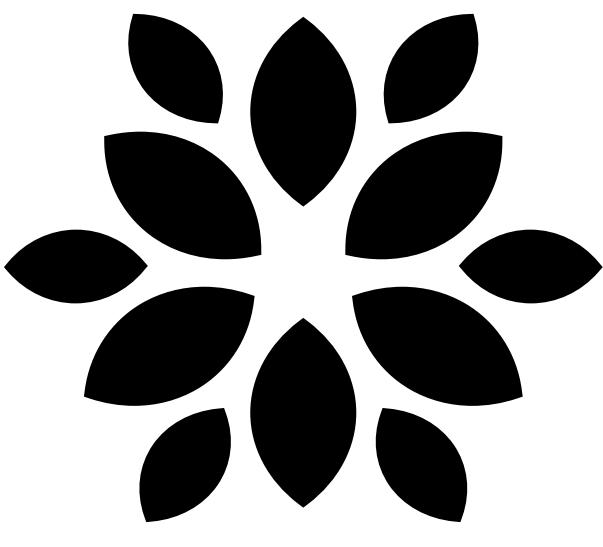
### LAND AT HUMBER DOUCY LANE



**BLOOR HOMES**

**MOSAIC**  
Urban Design & Masterplanning

**mode**



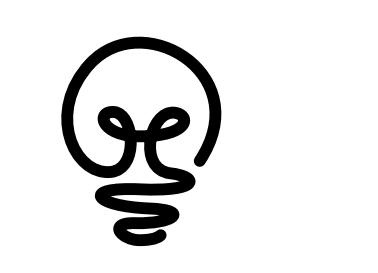
2-2,500 new homes at 35dph



New  
community  
facilities  
including 3-4  
local centres



4-5 primary  
school forms  
of entry and  
a secondary  
school



Employment



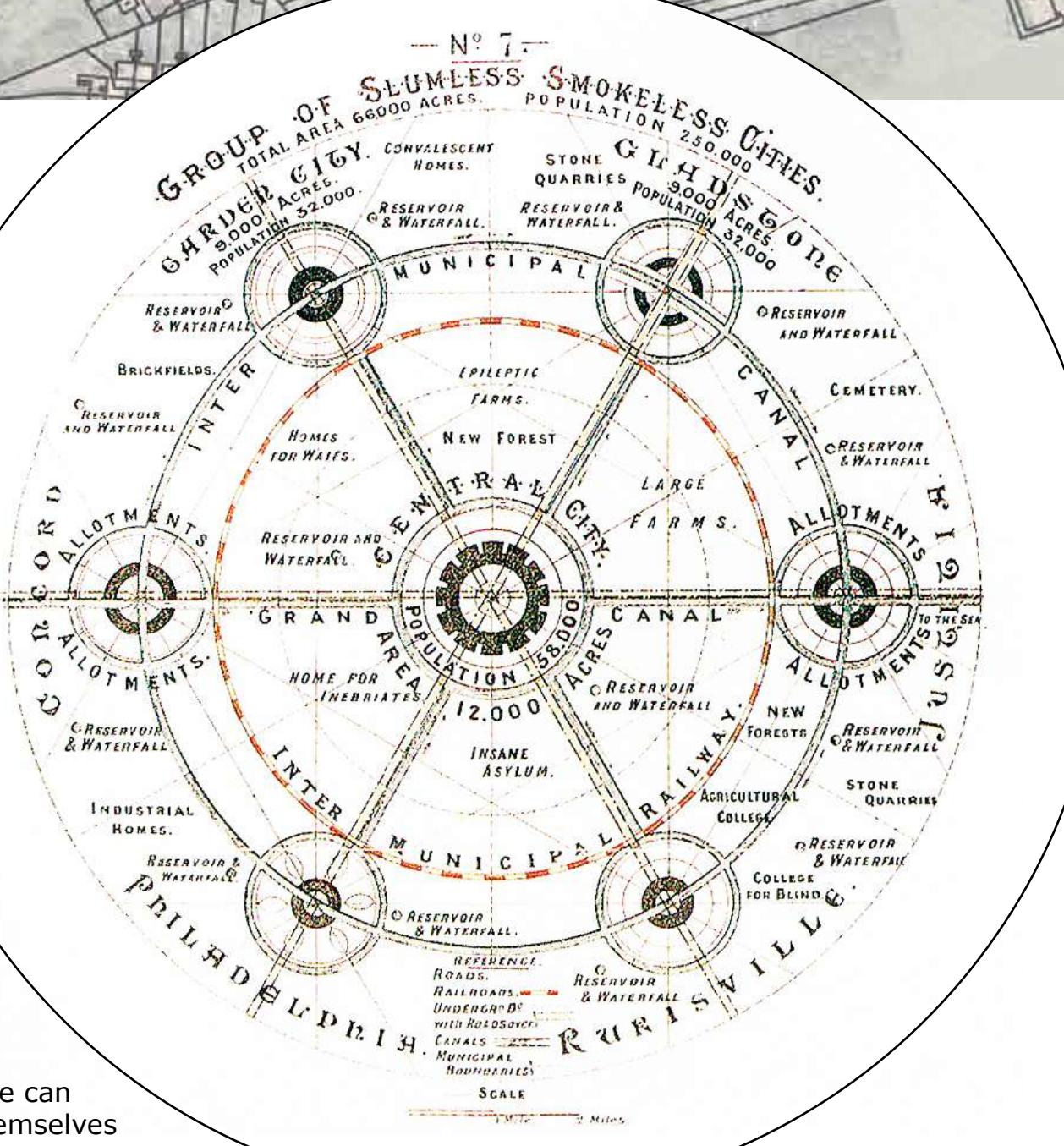
## OPPORTUNITY

### A Garden Community

The revised National Planning Policy Framework was published on 24 July 2018 and sets out the government's planning policies for England and how these are expected to be applied.

The National Planning Policy Framework (NPPF) recommends Local Authorities plan for larger scale development (new settlements or extensions) following the principles of Garden Cities. In response to the Government's Garden communities prospectus we intend to submit the Land at Humber Doucy Lane for consideration.

The Land at Humber Doucy Lane will not be a dormitory community, or a place which just uses 'garden' as a convenient label. We will set clear expectations for the quality of the development and how this can be maintained. We want to see a vibrant, mixed-use, community where people can live, work, and play for generations to come – a community which views themselves as the conservation areas of the future. The Land at Humber Doucy Lane will be holistically planned, self-sustaining, and characterful.



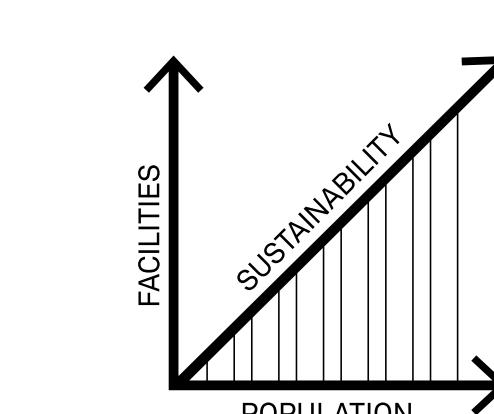
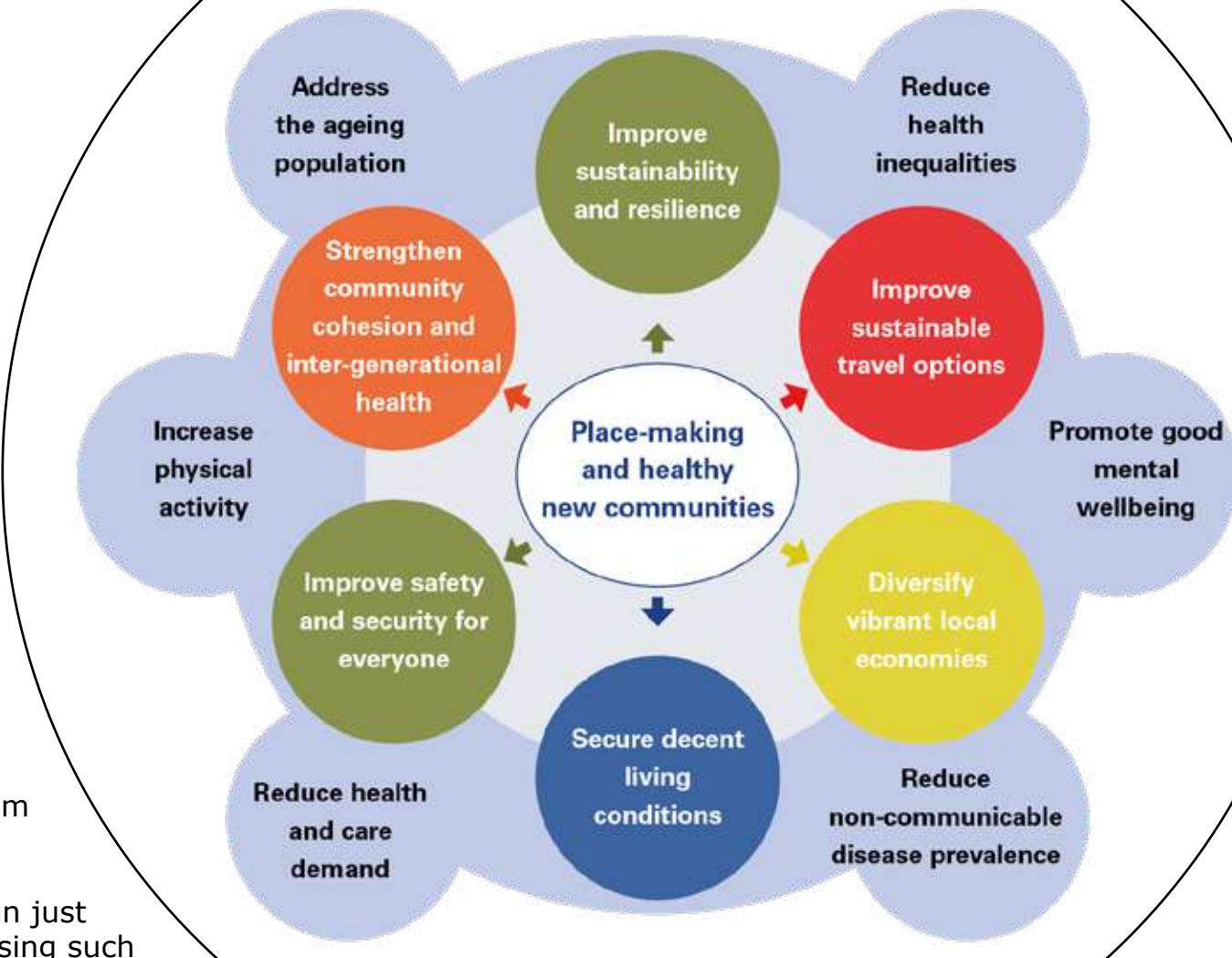
### A Healthy Community

The NPPF states planning policies and decisions should aim to achieve healthy, inclusive and safe places.

"When taking a place-based approach, healthy developments will not only help the local authority to improve population health in terms of both physical and mental wellbeing, but will also help in achieving multiple local objectives and priorities within the wider place-making agenda, such as improving road safety, reducing air pollution, maximising environmental protection, or securing infrastructure investment to attract new residents and a skilled working population. Meeting these wider objectives can result in attracting the right workforce to work in the health and care system and in other local industries."

All this makes creating a high-quality living environment more than just a matter of addressing issues that adversely affect health. Addressing such multiple local priorities can also help to promote good health: the quality of the environment and the local socioeconomic context are contributing factors."

Source: TCPA, 2017, guide 8 creating health promoting environments.

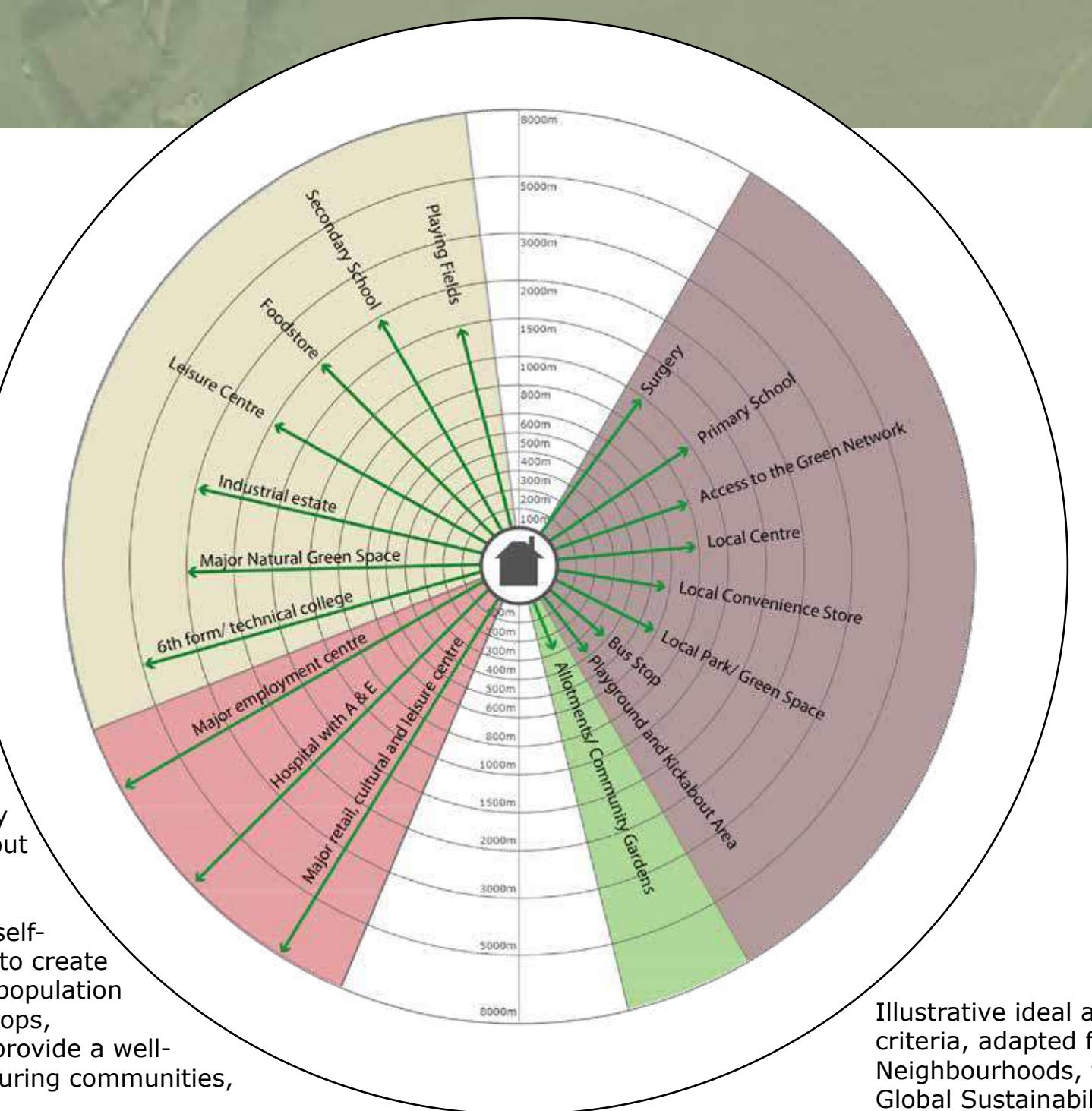


### A Complete Community

Access to local facilities is fundamental to the concept of locating sustainable development.

New development needs the full range of social, retail, educational, health, transport and recreational facilities to allow people, especially those of limited means or mobility, to go about their daily lives without over reliance on a private car.

If well planned, the Land at Humber Doucy Lane, Ipswich, can be a self-sustaining community. The scale of the site presents an opportunity to create a new healthy garden community of approximately 5,000 people. A population of this order is enough to trigger a full range of facilities including shops, employment, leisure and education on-site to support daily life and provide a well-rounded community that meet the needs of its citizens, and neighbouring communities, over their lifetime.



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Illustrative ideal accessibility criteria, adapted from 'Shaping Neighbourhoods, for Local Health and Global Sustainability'.  
22.08.2018 / Scale: 1:2,500 @ A0

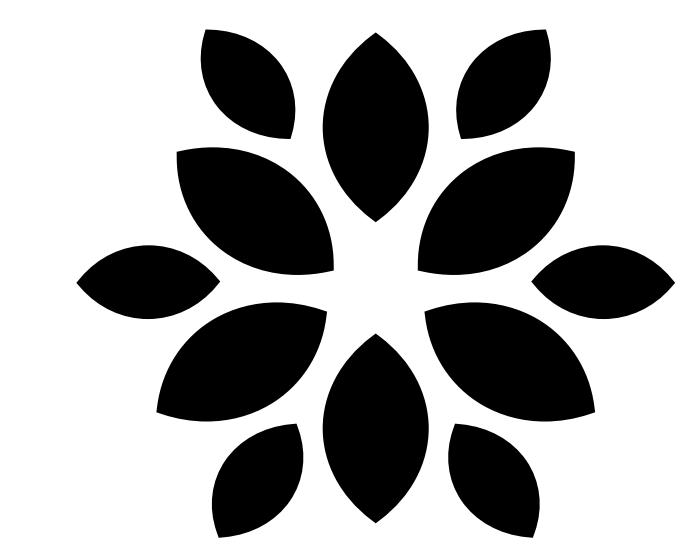


N  
◆  
Phase One  
Indicative Masterplan Framework

- Red line
- Public Right of Way
- Local authority boundary

- |     |                   |     |                     |      |                     |
|-----|-------------------|-----|---------------------|------|---------------------|
| (1) | Site access       | (4) | SUDS Pond           | (7)  | Structural planting |
| (2) | Public footpath   | (5) | Neighbourhood green | (8)  | Meadow parkland     |
| (3) | Community orchard | (6) | Mixed-use           | (9)  | Active sports       |
|     |                   |     |                     | (10) | Emergency access    |

LAND AT  
HUMBER  
DOUCY LANE



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## **Appendix C**



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**SUFFOLK COASTAL LOCAL PLAN  
EXAMINATION HEARING STATEMENT  
FOR HEARING SESSION ON 20 AUGUST 2019**

**MATTER 2A – HOUSING PROVISION**

**Prepared by Strutt & Parker on behalf of Bloor Homes Eastern  
July 2019**

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|                 |                                                                                         |
|-----------------|-----------------------------------------------------------------------------------------|
| Site Name:      | Land North of Humber Doucy Lane and South of Lamberts Lane, Rushmere St Andrew, Ipswich |
| Client Name:    | Bloor Homes Eastern                                                                     |
| Type of Report: | Hearing Statement – Matter 2A                                                           |
| Prepared by:    | Derek Stebbing BA(Hons) DiP EP MRTPI                                                    |
| Approved by:    | Andrew Butcher Dip TP. MRTPI                                                            |
| Date:           | 31 <sup>st</sup> July 2019                                                              |

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## Matter 2A – Housing Provision

### 1.0 Introduction

- 1.1 Strutt & Parker are instructed by Bloor Homes Eastern to submit this Hearing Statement to the Examination for the Suffolk Coastal Local Plan (2018-2036). Previous submissions on behalf of our clients have been made to the Suffolk Coastal District Council (now part of East Suffolk Council) throughout the emerging Local Plan process.
- 1.2 Bloor Homes Eastern are promoting the residential allocation of the land to the north east of Humber Doucy Lane and Lamberts Lane, Rushmere St Andrew, Ipswich. The land was referenced by the Council as Sites 1087 and 1145 in earlier Local Plan Consultation documents and was assessed in the Initial Sustainability Appraisal. A Location Plan outlining the site and Draft Masterplan accompanies this representation.
- 1.3 The overall site is approximately 115 hectares in size and comprises two potential residential development allocations, the first being the short-term delivery comprising of 13.5 hectares of land north east of Humber Doucy Lane; and the second comprising the remaining land, which lies to the north east of Lamberts Lane. This is being promoted as a medium-term opportunity by Bloor Homes for a Garden Village development. These opportunities respond to the identified role of the Local Plan in addressing the strategic objectives for the area.
- 1.4 This Hearing Statement is concerned with Matter 2A of the Examination Hearing programme, and specifically addresses Point 2.4 of the Inspector's questions for Matter 2A.

## 2.0 Point 2.4 Does Policy SCLP2.1 serve a clear purpose and would it be effective?

2.1 Policy SCLP2.1 states as follows :-

### ***Policy SCLP2.1: Growth in the Ipswich Strategic Planning Area***

*Suffolk Coastal will continue to play a key role in the economic growth of the Ipswich Strategic Planning Area, whilst enhancing quality of life and protecting the high quality environments. Over the period 2018-2036, the Suffolk Coastal Local Plan will contribute to:*

- a) *The creation of at least 30,320 jobs through the provision of at least 49.8ha of employment land across the Ipswich Functional Economic Area;*
- b) *The collective delivery of at least 37,328 dwellings across the Ipswich Housing Market Area; and*
- c) *Supporting the continued role of Ipswich as County Town.*

*The Council will work actively with the other local planning authorities in the ISPA and with Suffolk County Council to co-ordinate the delivery of development and in monitoring and reviewing evidence as necessary.*

2.2 The four authorities of Ipswich Borough Council, Suffolk Coastal District Council, Mid-Suffolk District Council and Babergh District Council are presently progressing joint work through the Ipswich Strategic Planning Area Board (formerly the Ipswich Policy Area) on the strategic cross-boundary issues affecting the four authorities. In particular, with specific relevance to our client's interests, the authorities (following the Inspector's report in 2017 on the Examination of the now adopted Ipswich Local Plan) are working together in order to meet the housing need for the Ipswich Housing Market Area and agree the strategic distribution of development to meet that need.

2.3 In 2017 the Ipswich Local Plan Inspector reported as follows:

*"28. Given my concerns about the robustness of the 13550 OAN there is an urgent need for the Council to work with its neighbouring authorities to produce a fit-for-purpose objective assessment of need for new housing for the Ipswich Housing Market Area. This conclusion is consistent with my Interim Findings published in April 2016 following the initial Examination hearings but also has regard to the subsequently-*

*published 2014-based household projections. Thus, and in line with the Memorandum of Understanding detailed in the assessment of the Duty to Co-operate, MM4 - MM6 (policies CS6 and CS7) commit the Council to working with its neighbours to prepare an updated OAN for housing for the HMA as a whole, a strategy for the distribution of it between the constituent districts and the adoption of joint or aligned local plans to deliver this by 2019.”*

and

*29. However, the Council contends that appropriate, available and deliverable housing sites within Ipswich itself would only deliver 9777 dwellings during the plan period. Whilst with reference to specific sites there is some challenge to this figure, there is nothing to give confidence that substantially more than this number of dwellings can be delivered in the town to 2031. Based on all that I have read and heard, considered in the round and notwithstanding the 2014-based household projection figure, I conclude that it is highly likely that the forthcoming work will identify that the OAN for Ipswich for the period to 2031 is at least equivalent to the 9777 dwellings which the Council contends can be delivered in this period”*

- 2.4 The authorities have prepared a Statement of Common Ground (SoCG) (v4 March 2019) to address the strategic cross-boundary planning matters in the Ipswich Strategic Planning Area. Key extracts from that document regarding the approach to the delivery of the housing requirement are set out below:

***“Process of reaching outcomes and agreements***

*The Ipswich Strategic Planning Area Board provides a mechanism to discuss the authorities’ approach to housing requirements and to inform and guide the approach to be taken within each Local Plan.*

*C1) The housing need calculated under the standard methodology will form the starting point for identifying housing requirements. The Suffolk Coastal First Draft Local Plan, published for consultation between July and September 2018, was based upon the need figures published by MHCLG in September 2017 under the ‘Planning for the Right Homes in the Right Places’ consultation. The NPPF was published in July 2018 and the Planning Practice Guidance updated in September 2018. The 2017 ratios of median workplace earnings to median house prices were published in April 2018 and the 2016-based household projections were published in September 2018. The Planning Practice Guidance has subsequently been updated in February 2019 to state that the 2014-based household projections should be used in*

*the calculation. Local housing need as calculated under the standard method will form the starting point in identifying housing requirements.*

*C2) The standard method will, therefore, also provide the starting point for identifying the total amount of housing to be provided in the Ipswich Housing Market Area.*

*C3) Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum housing number it is intending to deliver in its own area. Where the need cannot be met within the local authority's boundary, following a comprehensive re-assessment of deliverability the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.*

*C4) Provision for Gypsies and Travellers – the 2017 Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment identified a need for additional pitches to be provided for Babergh, Mid Suffolk, Ipswich and Suffolk Coastal. Each local planning authority will plan to meet its own need for permanent pitches for Gypsies and Travellers and should have a policy setting out how this will be delivered in its own area. Where the capacity to accommodate pitches cannot be met within the local authority's boundary a comprehensive re-assessment of deliverability will be undertaken and the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.*

*C5) Mix and type of housing: The Authorities published an update to Part 2 of the Strategic Housing Market Assessment in January 2019. This updates the size, type and tenure of housing needed, including the need for affordable housing, based upon the housing need calculated under the standard method.*

C6) Strategic policies in emerging Local Plans are to reflect the outcomes above.

#### **D. Consideration of bordering strategic housing developments**

##### Background

*Due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich Borough boundary.*

##### Evidence

*The Councils have jointly commissioned transport modelling (with Suffolk County Council). The Methodology Report and the Results Report Volume 1: Suffolk Coastal and Ipswich were published in August 2018 as part of the consultation on the Suffolk Coastal First Draft Local Plan. Further transport modelling of preferred options has been undertaken and the Results Report Volume 2: Suffolk Coastal and Ipswich and an updated Methodology Report were published in January 2019. The Councils jointly commissioned a Settlement Sensitivity Assessment in relation to identifying landscape sensitivity around Ipswich. The Strategic Housing and Employment Land Availability Assessments identify sites which border or cross authority boundaries.*

##### Process of reaching outcomes and agreements

*The conclusions of the above evidence have been, and will continue to be, considered in site selection and in identifying any necessary mitigation.*

### Outcomes and agreements

*Land north east of Humber Doucy Lane is identified as a cross-border location for future development (within Ipswich Borough and Suffolk Coastal District) for housing delivery post 2031. This joint approach will help enable land within Ipswich Borough to come forward for housing. The relevant policies in Local Plans are:*

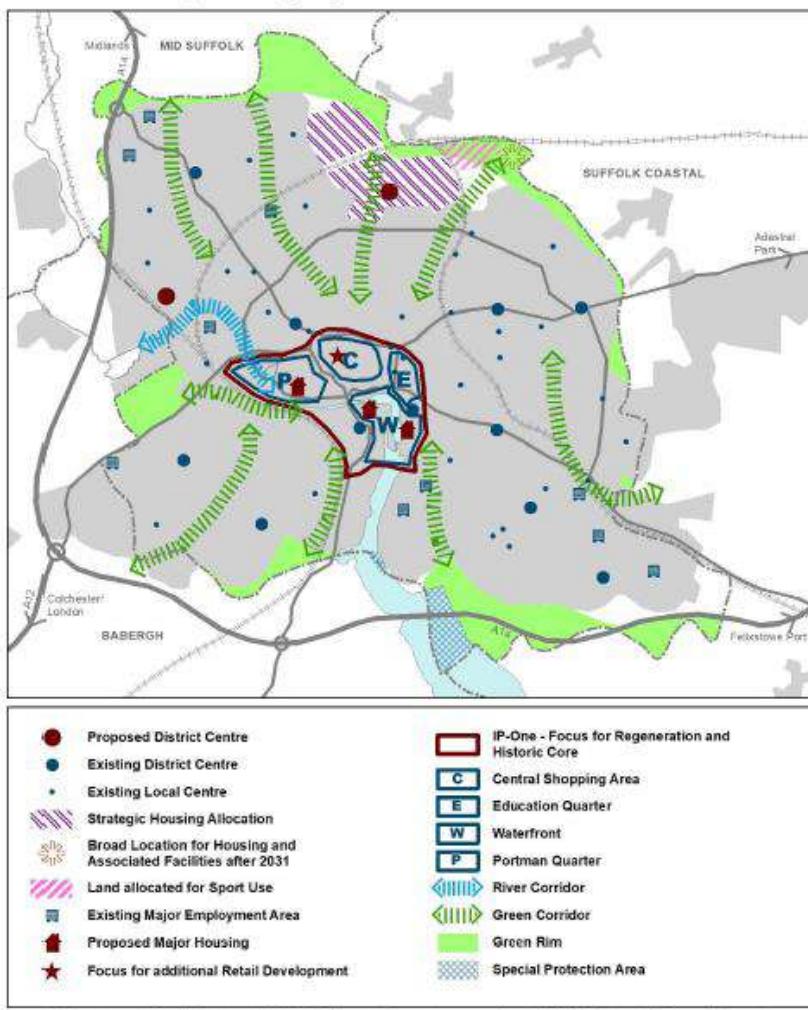
- *Ipswich Core Strategy and Policies DPD Review Preferred Options (November 2018), Policy ISPA4 ‘Cross Boundary Working to Deliver Sites’*
- *Suffolk Coastal Final Draft Local Plan (January 2019), Policy SCLP12.24 ‘Land at Humber Doucy Lane, Rushmere St Andrew’*

- 2.5 The key points arising from this strategic cross-boundary co-operation are that the four authorities are presently planning to meet a housing need of 37,278 dwellings up to 2036. Secondly, the SoCG recognises that “due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich borough boundary”.
- 2.6 However, Policy SCLP2.1 as presently drafted fails to provide sufficiently clear and effective strategic policy guidance on the nature of the Plan’s “close functional relationship” with Ipswich Borough. In fact, Section 2 of the Plan entitled “Wider Strategic Planning Area”, containing Policy SCLP2.1, is generally not explicit on the potential strategic cross-boundary issues that will clearly affect both the Suffolk Coastal Local Plan and the emerging Ipswich Local Plan during the respective Plan periods. We give detailed consideration to Policy SCLP12.24 (Land at Humber Doucy Lane) in our Hearing Statement for Matter 3 (Communities surrounding Ipswich). However it should be noted at this point that Policy SCLP12.24 is not set in the context of meeting strategic, long-term cross-boundary objectives. In fact, it was an addition to the Plan’s housing allocations introduced into the Plan at a relatively late stage.
- 2.7 As we understand the position, there is presently no intention by the Suffolk authorities to prepare a statutory or non-statutory Spatial Development Strategy for the Ipswich

Strategic Planning Area. It will therefore fall to the individual Local Plans prepared by the constituent authorities to take forward the strategic policy issues identified by the Ipswich Strategic Planning Area Board.

- 2.8 In our submission, the Suffolk Coastal Local Plan does not yet address such issues with sufficient clarity, particularly as they will affect the later years of the Plan period. It is clear from the Preferred Options consultation of the emerging Ipswich Local Plan that the Borough Council foresee a long-term strategic direction of growth to the north-east of the existing Ipswich urban area. This is identified on the Key Diagram accompanying that consultation, as below :

DIAGRAM 3: The Ipswich Key Diagram



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- 2.9 We would suggest that this long-term approach, which clearly indicates the proposed “direction of travel” for the growth of Ipswich, and which has obvious cross-boundary implications with the strategy of the Suffolk Coastal Local Plan, should be reflected with greater clarity in that Plan, and specifically within Policy SCLP2.1.

- 2.10 Furthermore, the recent publication for consultation of three potential routes for the Ipswich Northern Route (the link between the A12 and A14) reinforces the need for the Plan to set out in greater detail the strategic planning context for that link road, which is described in the Factual Note prepared by the Council on 25 July 2019.
- 2.11 Our client's land has key significance for the potential delivery of the Option C route, which is the southernmost and shortest route option. Whilst we clearly support that route option, it is not yet possible to pre-judge the outcome of the ongoing consultation. Nevertheless, we firmly consider that the Plan does need to contain a much clearer and fuller position statement by East Suffolk Council on the strategic planning implications of the proposed Link Road. In our assessment, it clearly recognises and endorses the long-term approach to the future growth of Ipswich, as being indicated in the emerging Ipswich Local Plan, which should be recognised in this Plan.

### **3. Conclusion and Proposed Change to Submission Local Plan**

- 3.1 In the context of the long-term strategic cross-boundary planning matters being addressed by the Ipswich Strategic Planning Area Board, and described above, we do not consider that Policy SCLP2.1 is effective. It presently fails to address cross-boundary matters with sufficient clarity. Specifically, it does not recognise the "direction of travel" for the growth of Ipswich post-2031, being identified in the emerging Ipswich Local Plan, nor the strategic implications of the proposed Ipswich Northern Route, in so far as it will directly support new homes and employment growth.
- 3.2 We consider that the Policy should be modified to reflect the content of the Factual Note published on 25 July 2019, together with a fuller position statement by the Council on its strategic planning objectives for the delivery of the Link Road and the spatial implications for future growth in the Ipswich/Suffolk Coastal Local Plan areas. It is absolutely clear that these are significant cross-boundary matters which should be addressed in the respective Local Plans. We therefore request that the Inspector recommends that such modification be made to the Plan in order to address these points.



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**SUFFOLK COASTAL LOCAL PLAN**

**EXAMINATION HEARING STATEMENT**

**FOR HEARING SESSION ON 21 AUGUST 2019**

**MATTER 2C – DISTRIBUTION OF GROWTH AND THE SETTLEMENT HIERARCHY**

**Prepared by Strutt & Parker on behalf of Bloor Homes Eastern**

**July 2019**

---

|                 |                                                                                         |
|-----------------|-----------------------------------------------------------------------------------------|
| Site Name:      | Land North of Humber Doucy Lane and South of Lamberts Lane, Rushmere St Andrew, Ipswich |
| Client Name:    | Bloor Homes Eastern                                                                     |
| Type of Report: | Hearing Statement – Matter 2C                                                           |
| Prepared by:    | Derek Stebbing BA(Hons) Dip EP MRTPI                                                    |
| Approved by:    | Andrew Butcher Dip TP. MRTPI                                                            |
| Date:           | 31 <sup>st</sup> July 2019                                                              |

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## Matter 2C – Distribution of Growth and the Settlement Hierarchy

### 1.0 Introduction

- 1.1 Strutt & Parker are instructed by Bloor Homes Eastern to submit this Hearing Statement to the Examination for the Suffolk Coastal Local Plan (2018-2036). Previous submissions on behalf of our clients have been made to the Suffolk Coastal District Council (now part of East Suffolk Council) throughout the emerging Local Plan process.
- 1.2 Bloor Homes Eastern are promoting the residential allocation of the land to the north east of Humber Doucy Lane and Lamberts Lane, Rushmere St Andrew, Ipswich. The land was referenced by the Council as Sites 1087 and 1145 in earlier Local Plan Consultation documents and was assessed in the Initial Sustainability Appraisal. A Location Plan outlining the site and Draft Masterplan accompanies our Hearing Statement for Matter 2A.
- 1.3 The overall site is approximately 115 hectares in size and comprises two potential residential development allocations, the first being the short-term delivery comprising of 13.5 hectares of land north east of Humber Doucy Lane; and the second comprising the remaining land which lies to the north east of Lamberts Lane. This is being promoted by Bloor Homes as a medium-term opportunity for a Garden Village development. These opportunities respond to the identified role of the Local Plan in addressing the strategic objectives for the area.
- 1.4 This Hearing Statement is concerned with Matter 2C of the Examination Hearing programme, and specifically addresses Points 2.17 and 2.18 of the Inspector's questions for Matter 2C.

**2.0 Point 2.17 - Is the strategy for growth set out in Policy SCLP3.1 justified and would it be effective in delivering sustainable development?**

2.1 Policy SCLP3.1 states as follows :-

***Policy SCLP3.1: Strategy for Growth in Suffolk Coastal District***

*The Council will deliver an ambitious plan for growth over the period 2018 – 2036 in Suffolk Coastal by:*

- a) *Supporting and facilitating economic growth through the supply of significantly more than the baseline requirement of 11.7ha of land for employment uses to deliver at least 6,500 jobs and to enable the key economic activities to maintain and enhance their role within the UK economy;*
- b) *Sustain and support growth in retail, commercial leisure and town centres including facilitating provision towards plan period forecasts of between 4,100 - 5,000 sq m of convenience retail floorspace and between 7,700 – 13,100 sqm of comparison retail floorspace;*
- c) *Significantly boosting the supply of housing, the mix of housing available and the provision of affordable housing, through the delivery of at least 582 new dwellings per annum (at least 10,476 over the period 2018 - 2036);*
- d) *Ensuring the provision of infrastructure needed to support growth;*
- e) *Protecting and enhancing the quality of the historic, built and natural environment across the District.*

*The strategy for growth will seek to provide opportunities for economic growth and create and enhance sustainable and inclusive communities through:*

- f) *The delivery of new Garden Neighbourhoods at North Felixstowe and South Saxmundham;*

- g) Utilising opportunities provided by road and rail corridors, including a focus on growth in the A12 and the A14 corridors;*
- h) New strategic employment allocations based around key transport corridors, including to support the Port of Felixstowe;*
- i) Strategies for market towns which seek to reflect and strengthen their roles and economies;*
- j) Appropriate growth in rural areas that will help to support and sustain existing communities.*

- 2.2 This Hearing Statement supports our client's case that the Submission Draft Plan pays insufficient regard to the strategic context of meeting the full housing need up to 2036 across the Ipswich Strategic Planning Area, the potential need for Ipswich Borough Council to consider sites beyond its administrative boundaries as part of strategic cross-boundary distribution of housing growth (as reflected in Agreement C3 of the submitted Statement of Common Ground (v4 March 2019) and the fact that part of our client's site falls within the Ipswich Borough Council administrative area.
- 2.3 Policy SCLP3.1 sets out the plan for growth across the district throughout the Plan period, identifying targets and forecasts for delivery across key sectors with a significant boost planned for housing supply. The policy sets a target of delivering at least 10,476 new dwellings throughout the Plan period with the delivery mechanism largely focused on two new garden Neighbourhoods at North Felixstowe and South Saxmundham.
- 2.4 However, the policy and its supporting justification (paragraphs 3.27-3.35) fails to make any specific reference at all to the "East of Ipswich Major Centre" as defined in the Plan's settlement hierarchy (within Policy SCLP3.2). There is no indication that the area is a part of the "Spatial Strategy for Growth" through to 2036 or indeed part of any ongoing strategic cross-boundary considerations with Ipswich Borough Council.
- 2.5 The thrust of our concerns regarding Policy SCLP2.1 is therefore also equally applicable to Policy SCLP3.1, in that the policy fails to recognise the Plan's stated "close functional relationship" with Ipswich Borough.

2.6 Policy SCLP3.1 is therefore defective through its failure to recognise and address the strategic cross-boundary issues arising from the Plan's strategy for growth over the period 2018-2036, and its further failure to take account of the "East of Ipswich Major Centre", either as part of those cross-boundary considerations or as part of the Plan's growth strategy. The policy is effectively silent on these matters. Furthermore, the policy does not reflect the outcomes and agreements set out in the submitted SoCG, notably the statement that "*The Ipswich Strategic Planning Area Board provides a mechanism to discuss the authorities' approach to housing requirements and to inform and guide the approach to be taken within each Local Plan*". It is clear that the Submission Draft Plan was largely prepared in advance of these considerations, at least in as far as addressing the cross-boundary implications of meeting housing need in both Ipswich and Suffolk Coastal Districts are concerned, with the small allocation set out at Policy SCLP12.24 being added at a late stage in the Plan's preparation and without fuller consideration of other potential development opportunities in the North East Ipswich area, which include our client's site.

### **3.0 Point 2.18 - Is the identification of settlements set out in the Settlement Hierarchy in Policy SCLP3.2 justified?**

- 3.1 Rushmere St. Andrew (excluding the village) is defined within Policy SCLP3.2 as constituting part of the "East of Ipswich Major Centre" within the policy's settlement hierarchy. The policy notes that "*The Settlement Hierarchy enables the Council to achieve its vision for the District, meeting the scale of development required and enhancing the quality of the built, natural, historic, social and cultural environments whilst sustaining the vitality of communities*", and also that "*The development requirements for Major Centres, Market Towns, Large Villages and Small Villages will be delivered through site allocations in the Local Plan or in Neighbourhood Plans, plus through windfall development in accordance with other policies in this Local Plan*".
- 3.2 The summary of the various policy approaches to the Settlement Hierarchy set out in Table 3.4 indicates that the only projected housing growth for the "East of Ipswich Major Centre" will be through development at Brightwell Lakes, at the Suffolk Police HQ site at Martlesham Heath and by development within settlement boundaries. It

is noteworthy that the proposed allocation in Policy SCLP12.24 is not listed within Table 3.4, inferring that it is in fact not being considered as part of the planned approach for housing development in the East of Ipswich Major Centre, as also discussed at paragraph 2.6 above. This is indicative of the Plan's disjointed approach towards addressing the strategic planning opportunities in that Major Centre.

- 3.3 As set out in our Hearing Statement for Matter 2A, we consider that the Suffolk Coastal Local Plan does not yet address strategic cross-boundary issues with Ipswich Borough with sufficient clarity, particularly as they will affect the later years of the Plan period. The emerging Ipswich Local Plan identifies a long-term strategic direction of growth to the north-east of the existing Ipswich urban area, which is not reflected in the Suffolk Coastal Local Plan. Such a planned direction of growth by Ipswich Borough Council is adjacent to the Plan's "East of Ipswich Major Centre" and potentially a part of that Major Centre, at least for the period post-2031.
- 3.4 The Plan's only statement, at paragraph 3.34, that "*In future Local Plan revisions, the Council will reconsider growth opportunities in the parts of the District neighbouring Ipswich, taking into account delivery rates at Brightwell Lakes and opportunity to bring forward development that supports the Business Case for strategic road routes to the north of Ipswich (as promoted by Suffolk County Council)*" is an inadequate and uncertain policy position, bearing in mind that the Plan is presently seeking to address growth requirements up to 2036, and that the Ipswich Northern Route could be delivered from 2027 onwards.

#### **4.0 Conclusion and Proposed Change to Submission Local Plan**

- 4.1 This Hearing Statement, specifically addressing Policies SCLP3.1 and SCLP 3.2, should be considered in the context of our client's broader case that the Plan presently fails to address the strategic cross-boundary matters being considered by the Ipswich Strategic Planning Area Board. We do not consider that Policy SCLP3.1 presently addresses such matters with sufficient clarity) and it specifically does not recognise the potential growth requirements of Ipswich Borough post-2031 and any potential requirements for further development in the "East of Ipswich Major Centre", as defined in Policy SCLP3.2 and amplified in Table 3.4.
- 4.2 We consider that Policy SCLP3.1, and its supporting justification, should be modified to provide a clear policy direction to the statement that is presently confined to paragraph 3.34 in the Plan, and that the "East of Ipswich Major Centre" will be expected to accommodate further growth in the later phases of this Plan period, together with supporting infrastructure such as the planned Ipswich Northern Route.



BNP PARIBAS GROUP



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**SUFFOLK COASTAL LOCAL PLAN  
EXAMINATION HEARING STATEMENT  
FOR HEARING SESSION ON 4 SEPTEMBER 2019  
MATTER 3 – AREA SPECIFIC STRATEGIES – DEVELOPMENT  
ALLOCATIONS**

**Prepared by Strutt & Parker on behalf of Bloor Homes Eastern  
July 2019**

---

|                 |                                                                                         |
|-----------------|-----------------------------------------------------------------------------------------|
| Site Name:      | Land North of Humber Doucy Lane and South of Lamberts Lane, Rushmere St Andrew, Ipswich |
| Client Name:    | Bloor Homes Eastern                                                                     |
| Type of Report: | Hearing Statement – Matter 3                                                            |
| Prepared by:    | Derek Stebbing BA(Hons) DiP EP MRTPI                                                    |
| Approved by:    | Andrew Butcher Dip TP. MRTPI                                                            |
| Date:           | 31 <sup>st</sup> July 2019                                                              |

## Suffolk Coastal Local Plan Examination

### Matter 3 – Area Specific Strategies – Development Allocations

#### 1.0 Introduction

- 1.1 Strutt & Parker are instructed by Bloor Homes Eastern to submit this Hearing Statement to the Examination for the Suffolk Coastal Local Plan (2018-2036). Previous submissions on behalf of our clients have been made to the Suffolk Coastal District Council (now part of East Suffolk Council) throughout the emerging Local Plan process.
- 1.2 Bloor Homes Eastern are promoting the residential allocation of the land to the north east of Humber Doucy Lane and Lamberts Lane, Rushmere St Andrew, Ipswich. The land was referenced by the Council as Sites 1087 and 1145 in earlier Local Plan Consultation documents and was assessed in the Initial Sustainability Appraisal. A Location Plan outlining the site and Draft Masterplan accompanied our Hearing Statement for Matter 2A. The site lies to the east of the proposed allocation of land at Humber Doucy Lane in the Plan at Policy SCLP12.24, which is the subject of this Hearing Statement.
- 1.3 The overall site is approximately 115 hectares in size and comprises two potential residential development allocations, the first being the short-term delivery comprising of 13.5 hectares of land north east of Humber Doucy Lane; and the second comprising the remaining land which lies to the north east of Lamberts Lane. This is being promoted by Bloor Homes as a medium-term opportunity for a Garden Village development. These opportunities respond to the identified role of the Local Plan in addressing the strategic objectives for the area.
- 1.4 This Hearing Statement is concerned with Matter 3 of the Examination Hearing programme, and specifically addresses Point 3.27 of the Inspector's questions for Matter 3.

## 2.0 Matter 3 – Communities Surrounding Ipswich

**Point 3.27 - What is the justification for the allocation of land at Humber Doucy Lane coming forward beyond 2031? Is Policy SCLP12.24 developable within the plan period?**

2.1 Policy SCLP12.24 states as follows:-

**Policy SCLP12.24: Land at Humber Doucy Lane**

*9.9ha of land to the east of Humber Doucy Lane is identified to come forward for the development of approximately 150 dwellings post 2031. Development will come forward as part of a master planned approach with land in Ipswich Borough.*

*Development will be expected to comply with the following criteria:*

- a) *Delivery of a high quality design incorporating a mix of housing types, including affordable housing on-site;*
- b) *A site-specific Flood Risk Assessment will be required;*
- c) *Provision of 0.1ha of land for an early years setting if needed within the part of the site in Suffolk Coastal District;*
- d) *Contribution to the creation of a ‘green rim’ around Ipswich and provision of on-site open space;*
- e) *Provision of a soft edge to the urban area through the provision of significant landscaping;*
- f) *Promotion of the use of sustainable modes of transport; and*
- g) *An archaeological assessment will be required.*

*Development will be accessed via Humber Doucy Lane. A Transport Assessment will be required to identify any necessary improvements to highways and junctions on Humber Doucy Lane and Tuddenham Road.*

2.2 This Hearing Statement further supports our client's case that the Submission Draft Plan pays insufficient regard to the strategic context of meeting the full housing need up to 2036 across the Ipswich Strategic Planning Area, the potential need for Ipswich Borough Council to consider sites beyond its administrative boundaries as part of strategic cross-boundary distribution of housing growth (as reflected in Agreement C3 of the submitted Statement of Common Ground (v4 March 2019) and the fact that a part of our client's site falls within the Ipswich Borough Council administrative area. It should be read alongside our Hearing Statements for Matters 2A and 2C.

2.3 Policy SCLP12.24 was introduced into the Plan at a late stage, shortly before its final consultation and Submission for Examination. It has clearly been introduced because the proposals for the Ipswich Garden Suburb straddle the administrative boundary between Ipswich and East Suffolk. Indeed, this confirmed by paragraph 12.215 which states that “*The site is identified to come forward post 2031 to enable the delivery of the Ipswich Garden Suburb to become well established and for*

*infrastructure such as the primary school associated with the Ipswich Garden Suburb to be delivered.”*

2.4 This approach is piecemeal and disjointed. As noted in our Hearing Statement for Matter 2C the proposed allocation is not identified within Table 3.4 of the Plan as an element of the growth proposals for the “East of Ipswich Major Centre”, nor is it identified at any other point in the Plan as being within that Major Centre. Nevertheless, it is quite clearly part of a strategic development proposal (Ipswich Garden Suburb) to meet part of Ipswich’s growth requirements.

2.5 Our concerns regarding Policies SCLP2.1 and SCLP3.1 are equally applicable to Policy SCLP12.24, in that this policy also fails to demonstrate the Plan’s stated “close functional relationship” with Ipswich Borough.

2.6 It is our submission that, if Policy SCLP12.24 is to be justified, it should be set quite clearly in the context of being one element of the strategic cross-boundary issues (between Ipswich and East Suffolk) arising from the Plan’s strategy for growth over the period 2018-2036; in this case for the period post-2031. It should be further identified as being part of the “East of Ipswich Major Centre”.

2.7 As we have stated in our Hearing Statement for Matter 2A, the Plan should contain clearer policy guidance (within Policy SCLP2.1) on the strategic cross-boundary matters that will clearly affect the area to the north-east of Ipswich. These include the proposed “direction of travel” for the growth of Ipswich post-2031 and the proposed Ipswich Northern Route. It is clear that the Submission Draft Plan was largely prepared in advance of these considerations, and the relatively late addition into the Plan of Policy SCLP12.24 demonstrates that it has been reactive rather than proactive.

2.8 Policy SCLP12.24 is therefore just one small part of a much bigger strategic picture, and we consider that, as a minimum, the Plan should signal that land to the north-west of Rushmere St. Andrew may come forward for development in later years of the Plan period in order to address the wider strategic growth requirements of the Ipswich Strategic Planning Area.

2.9 The Plan's present stated approach (at paragraph 3.34) of intending to reconsider growth opportunities in the parts of the District neighbouring Ipswich in future revisions of the Local Plan is inadequate, if the Plan is expected to provide clear strategic policies for the whole of the Plan period, namely 2018-2036.

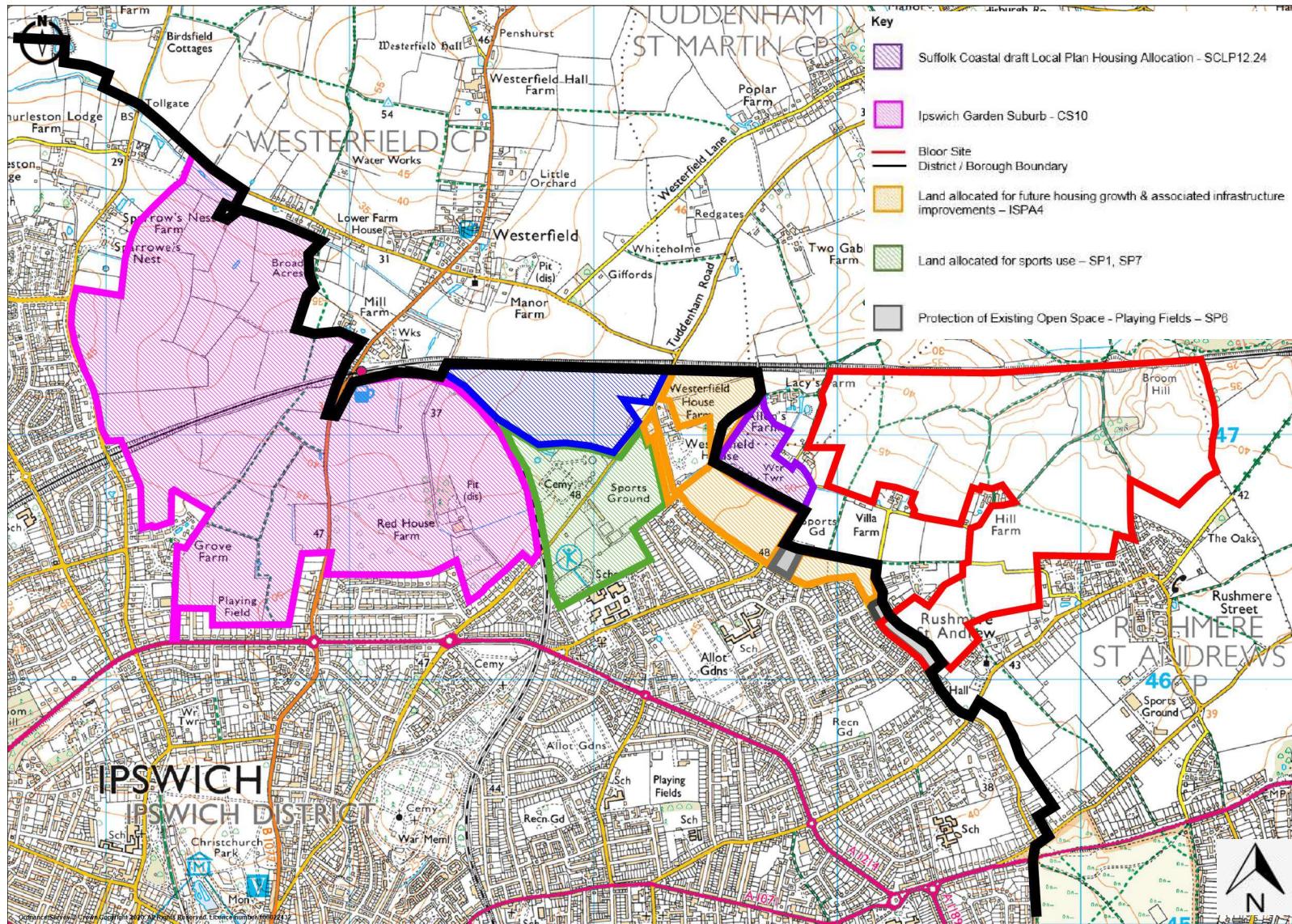
### **3. Conclusion and Proposed Change to Submission Local Plan**

3.1 This Hearing Statement, specifically addressing Policy SCLP12.24 should be considered in the context of our client's broader case that the Plan presently fails to address the strategic cross-boundary matters being considered by the Ipswich Strategic Planning Area Board. We do not consider that Policy SCLP12.24 and its supporting justification, as presently drafted, provides sufficient clarity or certainty on those matters, despite the fact that it is quite clearly proposed to be an element of meeting the potential growth requirements of Ipswich Borough post-2031.

3.2 Furthermore, Policy SCLP12.24 and its supporting justification, should be set within the context of contributing to the Plan's proposed distribution of growth to the "East of Ipswich Major Centre" and that further land, to the north-west of Rushmere St Andrew, may come forward for development in later years of the Plan period in order to address the wider strategic growth requirements of the Ipswich Strategic Planning Area, including the proposed Ipswich Northern Route.

## **Appendix D**

## Bloor Homes - Rushmere St Andrew - Site Allocations Plan



## **Appendix E**



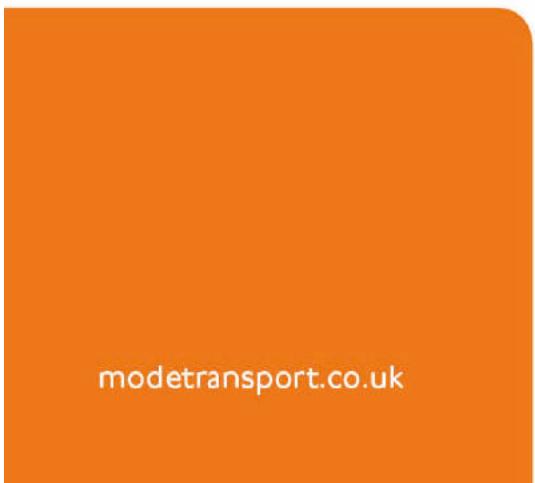
mode  
transport planning

Bloor Homes

# Land at Humber Doucy Lane, Rushmere St Andrew

## Phase 1 Transport Feasibility Study

March 2020



Bloor Homes

# Land at Humber Doucy Lane, Rushmere St Andrew

## Phase 1 Transport Feasibility Study

OFFICE ADDRESS:

Hawley Wharf  
1 Water Lane  
London  
NW1 8NZ

PROJECT NO:

J324587

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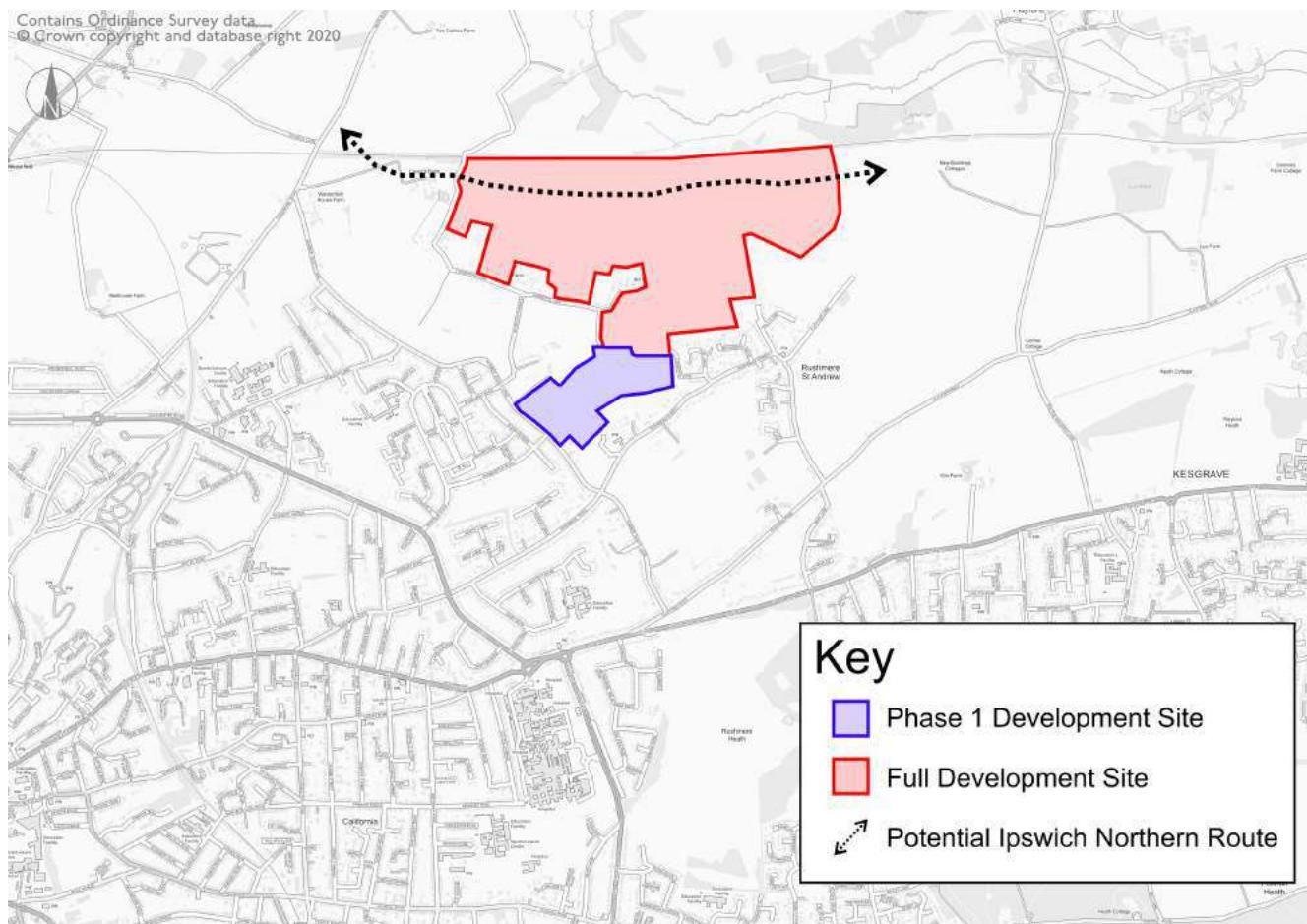
## APPENDIX A - SITE ACCESS MODELLING RESULTS

# 1 Introduction

## 1.1 Overview

- 1.1.1 mode transport planning (mode) have been commissioned by Bloor Homes to provide highways and transport advice for a residential development at land to the northeast of Humber Doucy Lane, approximately 3km from Ipswich Town Centre. The initial land parcel of the development is envisaged to provide circa 200 dwellings, which could act as a possible gateway for a further 1,200 dwellings and a future link to the potential Ipswich Northern Route (Inner Route). Whilst we understand that Suffolk County Council are not proceeding with the next stage of the business case into the Northern Relief Road, as confirmed at the Cabinet meeting on 25th February 2020, should this change in the future, the proposed Site can assist in the delivery of the Road. With Bloor Homes controlling a large part of the land to the north of Humber Doucy Lane, it is uniquely placed to be able to assist in the delivery of a relief road if required in the future. For the purposes of this report, the initial parcel of land is referred to as Phase 1.
- 1.1.2 **Figure 1.1** identifies the location of both Phase 1 and the wider site, as well as the indicative alignment of the Ipswich Northern Route (Inner Route).

Figure 1.1: Site Location

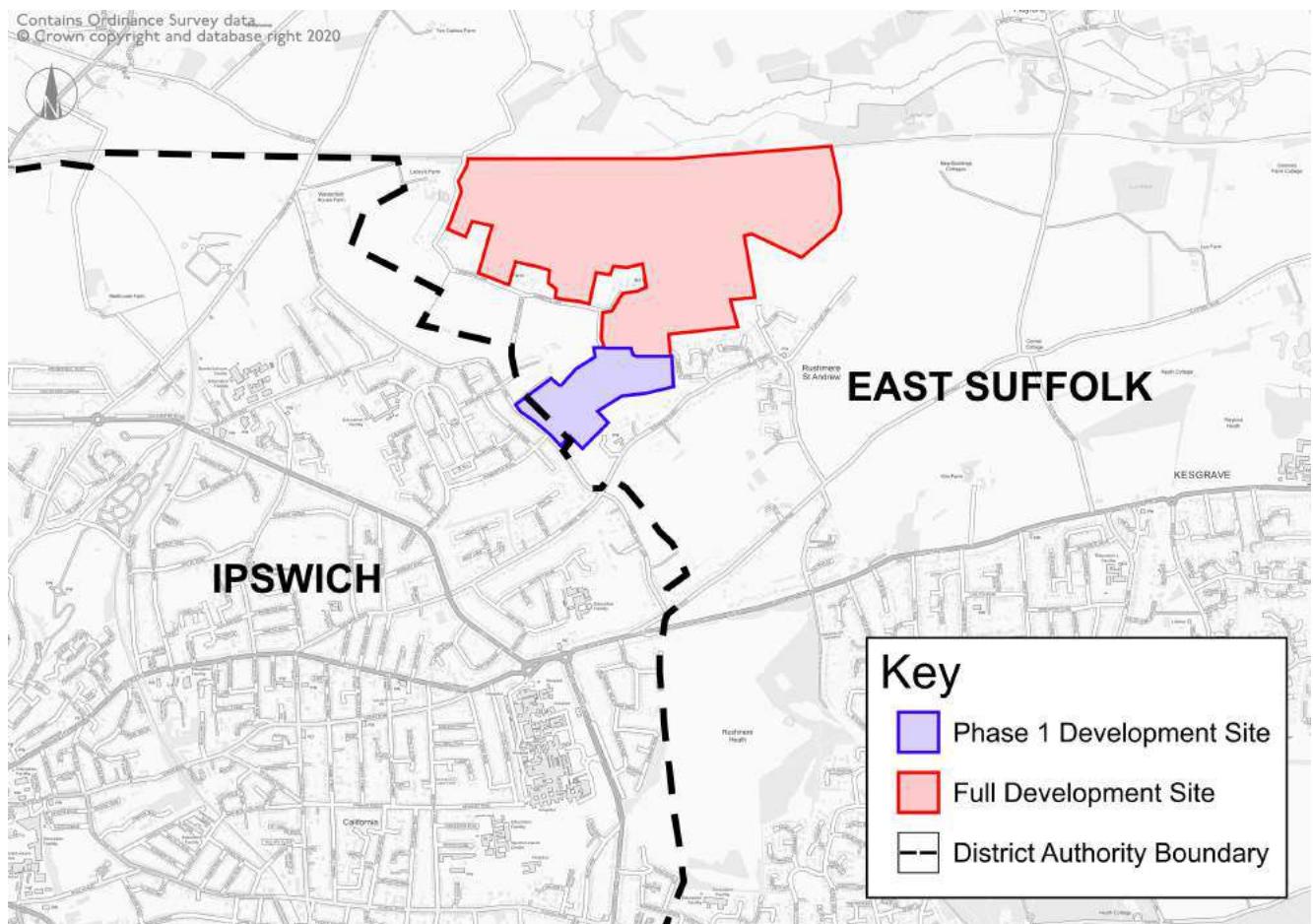


- 1.1.3 Phase 1 of the site is located on land immediately to the northeast of Humber Doucy Lane, extending from Rushmere Village Hall in the south to Tuddenham Lane in the north. The wider site encompasses a number of agricultural land parcels with areas of woodland and hedges bordering some of the fields. It is anticipated that initially this will be accessed via the Phase 1 development.
- 1.1.4 The consultation of the Ipswich Northern Route involves three key route options (outer, middle and inner) which offer links between the A14 and A12 in order to alleviate traffic routing through Ipswich and the Orwell Crossing to the south of the town.
- 1.1.5 The inner route option for the Ipswich Northern Route has the potential to route through the wider development area offering connection between the site to the A14 and the A12 to the west and east respectively.
- 1.1.6 Access to the Phase 1 site is currently proposed off Humber Doucy Lane via an existing agricultural access located approximately 40m north of Dumbarton Road, which will be widened and formalised as part of any future planning application.
- 1.1.7 In addition to the residential elements of the development, it is anticipated that Phase 1 could include a community orchard, a neighbourhood green, structural planting, meadow parkland and an area for active sports.
- 1.1.8 This Transport Feasibility Study considers the transport opportunities provided by the Phase 1 scheme, including access by sustainable modes. It also determines the level of traffic anticipated to be generated during the typical AM and PM peak hours and considers the forecast baseline traffic flows until 2036, being the end of the Plan period of both the emerging Suffolk Coastal Local Plan and Ipswich Local Period. This study also considers appropriate design of the site access to serve Phase 1.
- 1.1.9 In addition to the general context of the site, this report will explore how the site's location could provide an excellent opportunity to link to the inner option of the Ipswich Northern Route was promoted.

## 1.2 Planning History and Site Allocations

- 1.2.1 The site is located within Suffolk County and Suffolk County Council (SCC) act as highway authority for the area; however, Phase 1 of the development is located in both East Suffolk Council (formerly Suffolk Coastal District Council) and Ipswich Borough Council, both of whom will require consultation as part of the proposals. The location of the site relative to the district boundaries are shown on **Figure 1.2** below.

Figure 1.2: East Suffolk Council and Ipswich Borough Council boundaries



## 2 Existing Conditions

### 2.1 Introduction

- 2.1.1 This chapter sets out the context of the Phase 1 site in terms of the local highway network and explores the current situation of the site in terms of sustainable transport.

### 2.2 Local Highway Network

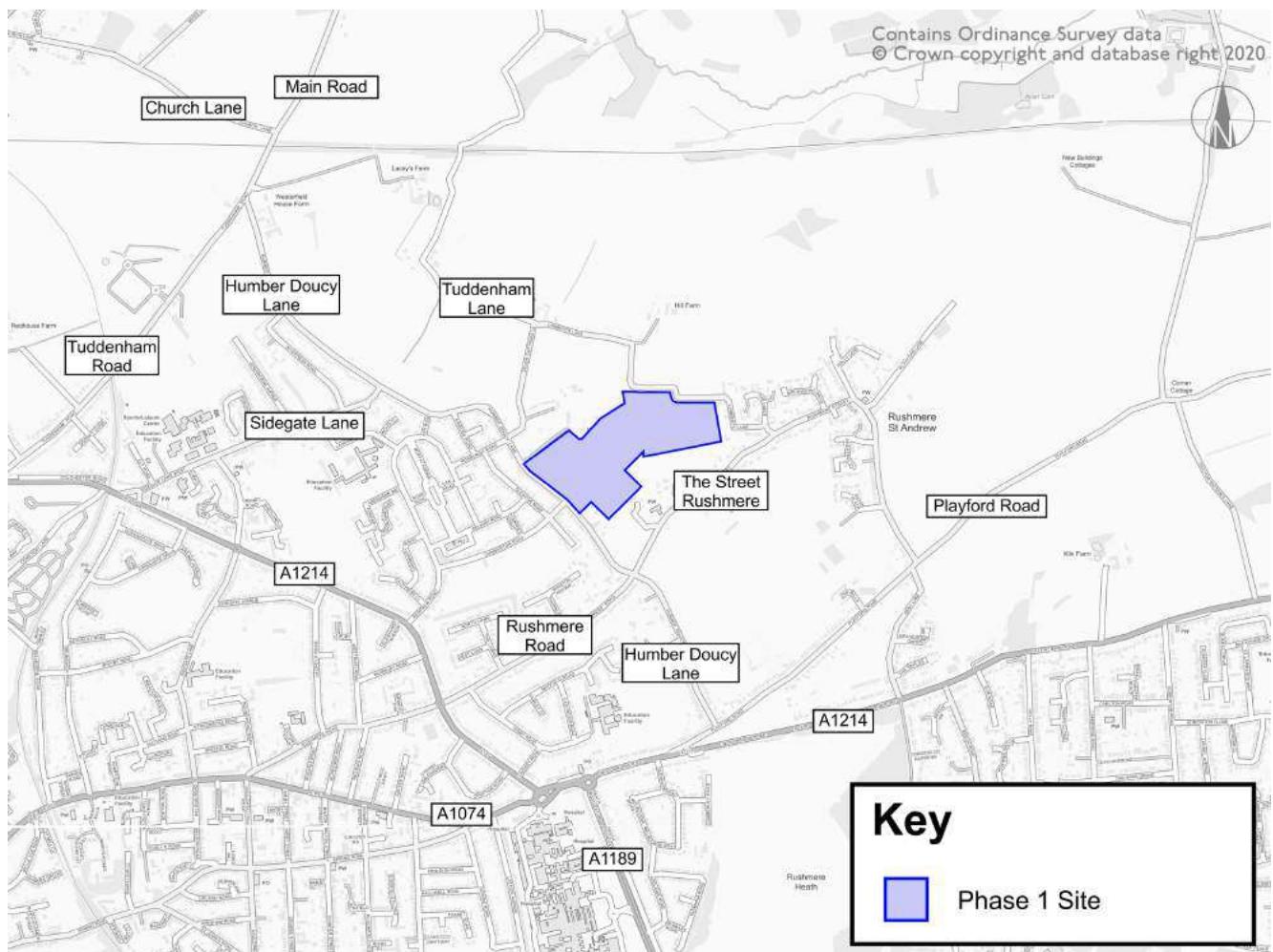
- 2.2.1 The first phase of development is to be located on land to the northeast of Humber Doucy Lane, extending from Rushmere Village Hall to Tuddenham Lane. The village of Rushmere St Andrew is approximately 650m to the east of the site, and Ipswich Town Centre is approximately 3km to the southwest.
- 2.2.2 Access to the Phase 1 site is currently provided off Humber Doucy Lane via an agricultural access located approximately 40m north of Dumbarton Road. This will be widened and formalised as part of any future planning application in order to appropriately serve the site. The access is currently an opening in the hedge line and is shown in **Figure 2.1** below.

Figure 2.1: Existing Site Access off Humber Doucy Lane



- 2.2.3 Humber Doucy Lane joins The Street Rushmere and Rushmere Road to the south via a mini roundabout, providing a connection to the village of Rushmere St Andrews to the east, and Ipswich Town Centre to the southwest respectively. At its northern extent, Humber Doucy Lane connects with Tuddenham Lane, which provides an alternative route to Ipswich Town Centre and a connection to the village of Westerfield and the A14. The local highway network in relation to the Phase 1 site is illustrated in **Figure 2.2**.

Figure 2.2: Local Highway Network



### Humber Doucy Lane

- 2.2.4 Humber Doucy Lane lies on a north-west to south-east axis and is subject to a 30mph speed limit. It has a 6m carriageway width outside the site access and benefits from 2m footway on its southern side. The road does not benefit from a centreline in the vicinity at the site frontage, and there are no parking restrictions along its extent, on site observations revealed that vehicles park on both sides of the carriageway.
- 2.2.5 To the south of the site, Humber Doucy Lane joins The Street Rushmere and Rushmere Road via a mini roundabout, where traffic can head south-west on Rushmere Road towards Ipswich Town Centre or north-east on The Street Rushmere towards the village of Rushmere St Andrew.

### The Street Rushmere

- 2.2.6 The Street Rushmere lies on a north-east to south-west axis and is a single carriageway road with a 4.5m carriageway width. It is subject to a 30mph speed limit and benefits from double yellow line restrictions to restrict parking along the carriageway. There is also a segregated footway along the northern side of the carriageway, which provides direct access to the Public Right of Way (PRoW) network that dissects the site. The Street Rushmere also provides pedestrian access to the village of Rushmere St Andrew via a continuous footway along the northern side of the carriageway.

### Rushmere Road

- 2.2.7 Rushmere Road lies on an east to west axis and is a single carriageway road with a 6m carriageway width. It is subject to a 30mph speed limit and benefits from double yellow line restrictions to restrict parking on the carriageway. Rushmere Road runs through the centre of a residential estate, with 2m footways on both sides of the carriageway. It continues west and provides a route towards Ipswich Town Centre via the A1156 Woodbridge Road.

### Tuddenham Road

- 2.2.8 Humber Doucy Lane extends north-westerly to Tuddenham Road via a priority junction, which enables connection to the village of Tuddenham to the north and the A1214 Colchester Road to the south, which continues towards Ipswich Town Centre. Tuddenham Road is subject to a 30mph speed limit within the vicinity of the junction with Humber Doucy Lane, and has a 6m carriageway width.

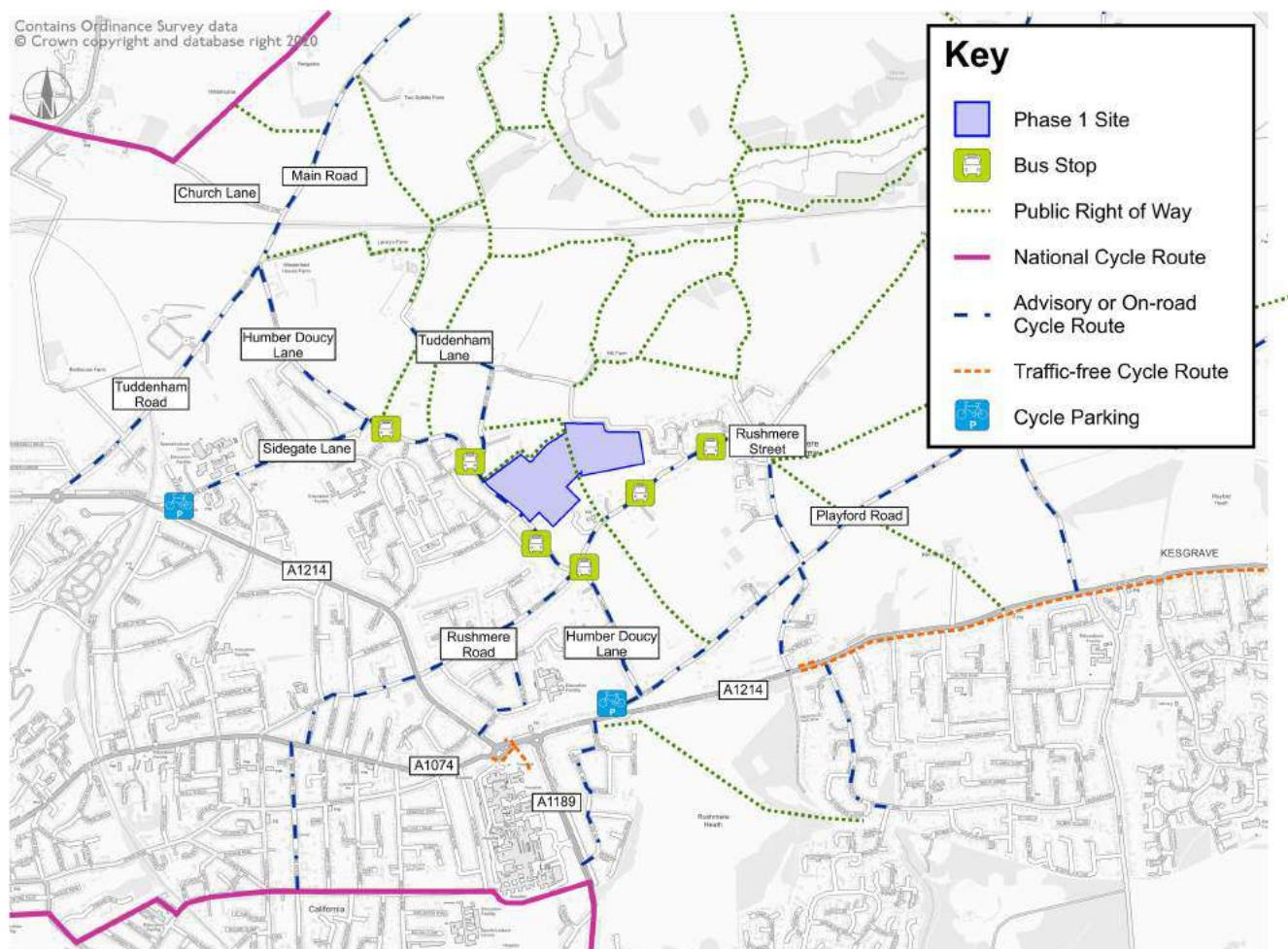
### Sidegate Lane

- 2.2.9 Sidegate Lane is single carriageway road accessed off Humber Doucy Lane opposite Ipswich Rugby Club, and provides a secondary route through a residential estate to join the A1214 Colchester Road, which continues towards Ipswich Town Centre. It is subject to 30mph speed limit and has a 6m carriageway width, and benefits from street lighting.

## 2.3 Walking and Cycling Accessibility

- 2.3.1 A desktop study has been undertaken to understand the existing facilities for pedestrians and cyclists within the vicinity of the proposed site and shown below on **Figure 2.3**.

Figure 2.3: Public Rights of Way (PRoW) and Cycling Routes



- 2.3.2 The nearby area benefits from numerous footways which follow the route of the local highway network and throughout the neighbouring residential estate. It is envisaged that these existing routes will be utilised and promoted for leisure usage. Suffolk County Council also provides an online map of all of the Public Rights of Way (PRoW), which identifies that a PRoW runs directly through the centre of the proposed site another that lies on the western boundary of the site.
- 2.3.3 In terms of cycling accessibility, Ipswich Borough Council provides an online cycle map illustrating the on-road and off-road cycle routes within and around the town (together with cycle parking facilities) and these routes are identified in **Figure 2.3**.
- 2.3.4 The online map indicates the following cycle facilities within the vicinity of the proposed site:

- The full extent of Humber Doucy Lane is an advisory cycle route;
- The full extent of Rushmere Street is an advisory cycle route;
- Seven Cottages Lane, to the north of the site is an advisory cycle route. This lane turns into Tuddenham Lane which is also an advisory cycle route, before becoming a public bridleway;
- Melborne Road and Adelaide Road, to the south of Humber Doucy Lane, forms an on-road signed cycle route (National Cycle Route number 4);
- There is cycle parking where Humber Doucy Lane meets Woodbridge Road East (via Playford Road) and where Sidegate Lane meets the A1214;

- There are small sections of traffic-free cycle routes to the south of Humber Doucy Lane (at the A1214/A1189 roundabout) and on the A1214 Woodbridge Road to the south of Rushmere St Andrew; and
- The westbound side of the A1214 Woodbridge Road, to the east of Rushmere Golf Course is a traffic free cycle route.

## 2.4 Access to Local Amenities

2.4.1 Guideline walking distances provided in the Chartered Institution of Highways and Transportation (CIHT) document 'Guidelines for Providing for Journeys on Foot (2000)', are shown in **Table 2.1**.

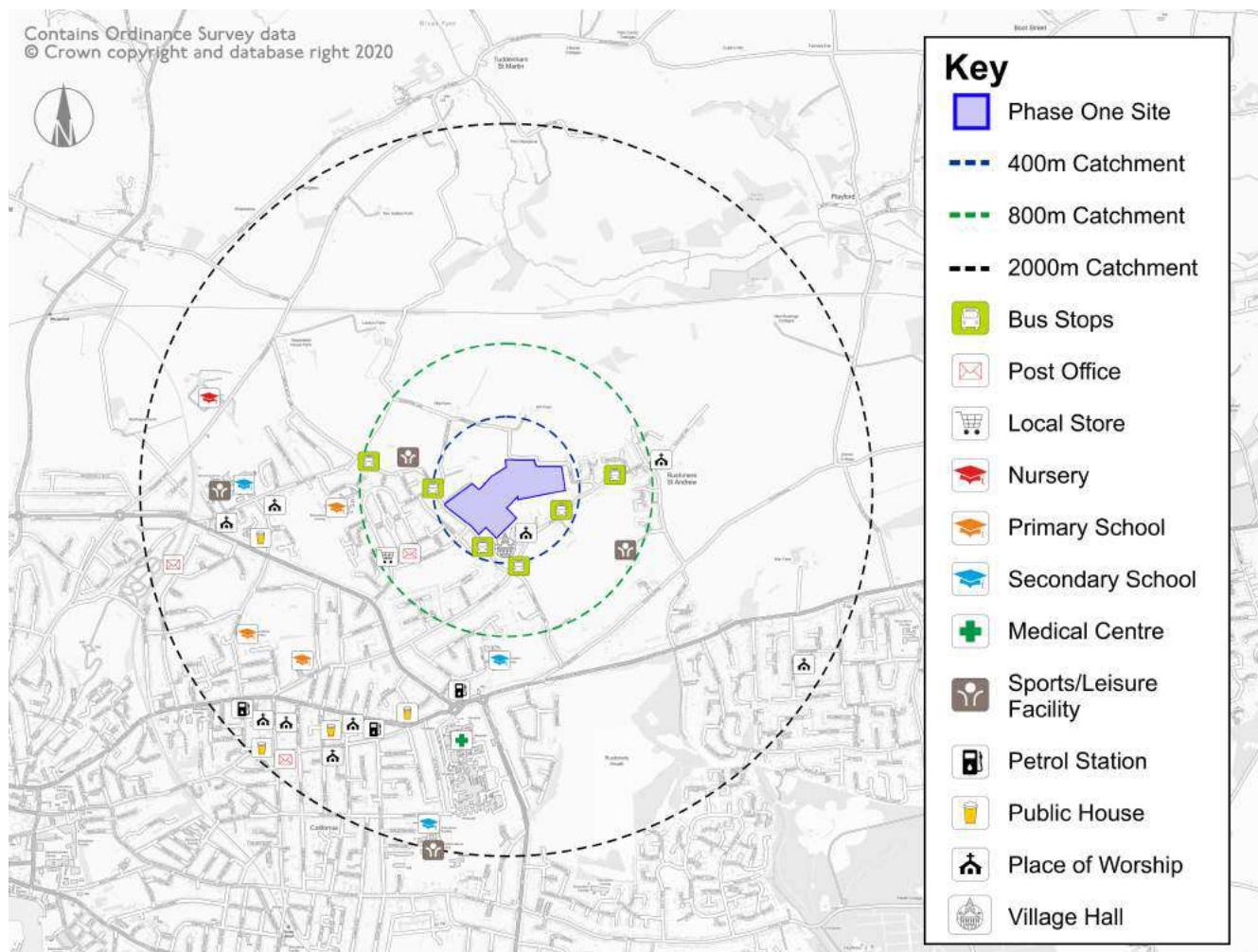
**Table 2.1: CIHT Guideline Acceptable Walking Distances**

| Criteria          | Town Centre | Commuting / Sight Seeing |
|-------------------|-------------|--------------------------|
| Desirable         | 200m        | 500m                     |
| Acceptable        | 400m        | 1,000m                   |
| Preferred Maximum | 800m        | 2,000m                   |

2.4.2 The CIHT guidelines shown in **Table 2.1** suggest that, for commuting purposes, up to 500m is a desirable walking distance, up to 1km is considered an acceptable walking distance and 2km is the preferred maximum walking distance.

2.4.3 Considering the walking distance guidelines above, a desk-top study has been undertaken to understand the number and type of local amenities in the local area and to identify those that will be accessible on foot. **Figure 2.4** below outlines the findings.

Figure 2.4: Amenities Location Plan



- 2.4.4 As can be seen in the figure above, there are a number of bus stops within 400m of the proposed residential site (with the nearest bus stop within 100m). Rushmere Village Hall, a place of worship and a community centre are also within a 400m catchment.
- 2.4.5 Within 800m, further bus stops are accessible, as is another place of worship. There are also two sports and leisure facilities, a local convenience store and a post office within the 800m catchment area.
- 2.4.6 Further afield within 2000m, there are numerous education facilities, places of worship, public houses, petrol stations, post offices, leisure facilities and a medical centre; all of which are accessible for the residents of the proposed development.

## 2.5 Bus Accessibility

- 2.5.1 The nearest bus stop to the proposed site is called the Community Hub, located at Rushmere Village Hall on Humber Doucy Lane. This is less than 100m from the Phase 1 site and can be reached on foot within 2 minutes. The 59 bus serves this stop and provides a connection towards Ipswich Town Centre and Rushmere during the week and on Saturday; there is currently no Sunday service.
- 2.5.2 The 59 service also serves the Roxburgh Road stop on Humber Doucy Lane, to the north of the site access.

- 2.5.3 Slightly further afield, there is a second bus stop at Rushmere Road which can be reached on foot within 6 minutes. This stop is served by the 59 service and the 71 and 72 services. The 71 service runs a weekday and Saturday route between Sudbourne and Ipswich, via Orford, Hollesley and Woodbridge. In addition, the 72 service operates during the week, connecting Woodbridge and Ipswich via Martlesham and Playford.
- 2.5.4 A summary of the bus timetables described above are shown in **Table 2.2** below for reference.

**Table 2.2: Local Bus Services**

| Service No | Route                                                 | Approx. Frequency – 2 way (buses/hour) |        |     |
|------------|-------------------------------------------------------|----------------------------------------|--------|-----|
|            |                                                       | Weekday                                | Sat    | Sun |
| 59         | Ipswich – Chelsworth Avenue - Rushmere                | Hourly                                 | Hourly | -   |
| 71         | Sudbourne – Orford – Hollesley – Woodbridge - Ipswich | 08:08                                  | 08:08  | -   |
| 72         | Woodbridge – Martlesham – Playford - Ipswich          | 09:48 and 13:03                        | -      | -   |

- 2.5.5 These existing services and stops provide future residents with an opportunity to travel sustainably using public transport, which is accessible on foot.

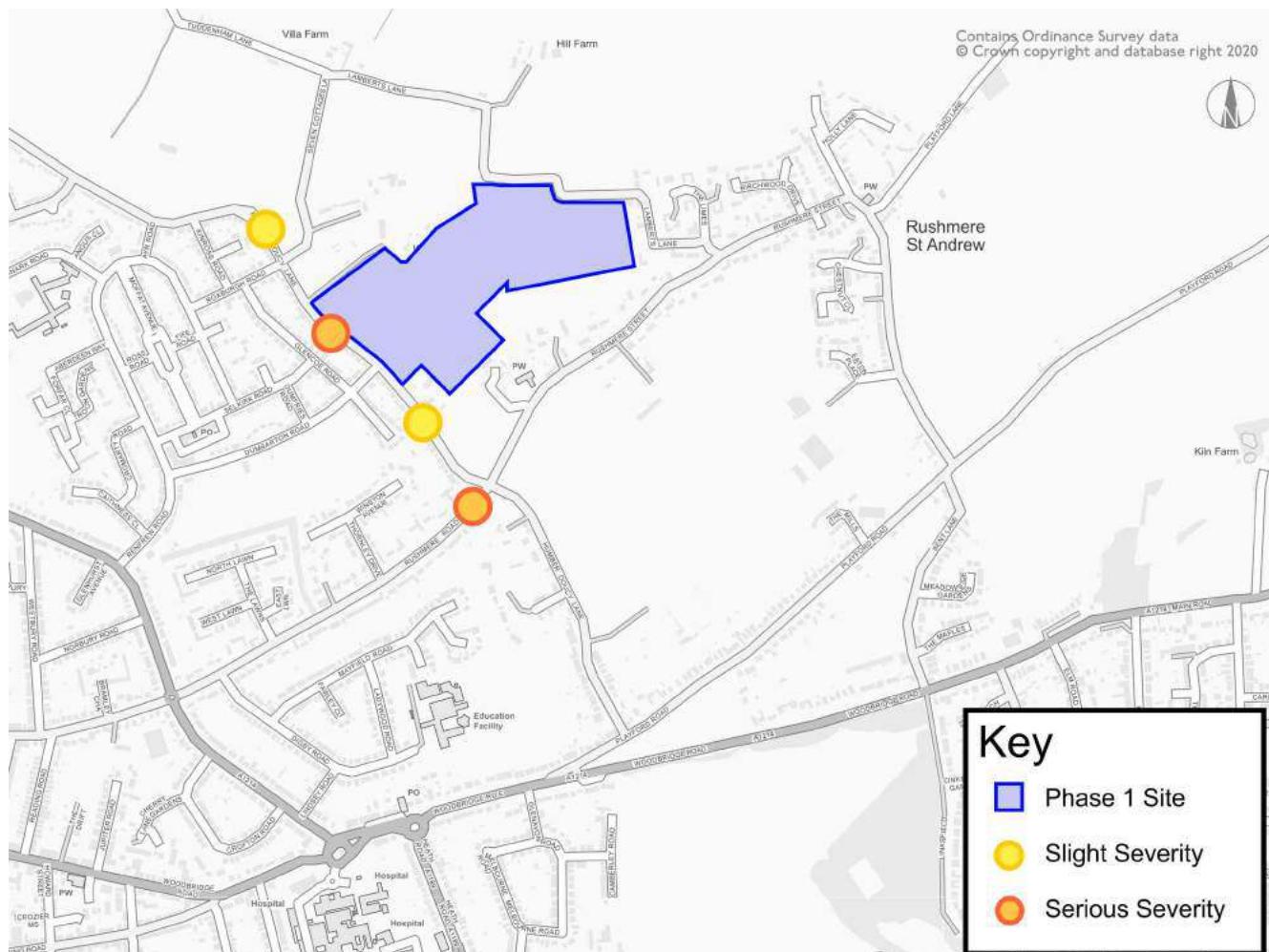
## 2.6 Rail Accessibility

- 2.6.1 There are two railway stations within proximity of the proposed site; with the closest being Derby Road Railway Station located 3km south of from the site. This railway station is located on the Felixstowe branch line which serves the Rose Hill area and southern area of California, Ipswich. There is an hourly service in each direction between Felixstowe and Ipswich. The railway station is managed by Greater Anglia trains.
- 2.6.2 Derby Road Railway Station is accessible from the site via a 10 minute cycle ride or a 6 minute car journey. This railway station is currently not easily accessible from the site via bus.
- 2.6.3 Westerfield Railway Station is also located close the site; approximately 3.5km northwest of the site. Westerfield station is on a branch line off the Great Eastern Main Line and is currently managed by Greater Anglia, who operate all trains serving the station. There is an hourly shuttle service to Ipswich via the Felixstowe line and there is a limited peak hour only service between Lowestoft and Ipswich.
- 2.6.4 Westerfield Railway Station is accessible via car in approximately 6 minutes. Westerfield railway station can also be accessed via public transport; the fastest route is served by the number 59 bus which runs from the Community Hub at Rushmere Village Hall. This journey would take approximately 19 minutes.
- 2.6.5 Individuals could also cycle to Westerfield Railway Station, where cycle parking is available, which would take approximately 11 minutes.

## 2.7 Road Safety Review

- 2.7.1 Personal Injury Collision (PIC) data has been obtained from Crashmap ([crashmap.co.uk](http://crashmap.co.uk)) for the most recently available six-year period (January 2013 and September 2018). The study area includes Humber Doucy Lane and the Humber Doucy Lane / Rushmere Road / The Street Rushmere roundabout.
- 2.7.2 The following figures show the extent of the local highway network being studied, location and severity of the PIC's reported during the study period.

**Figure 2.5: PIC Location Plan**



- 2.7.3 As shown in **Figure 2.5**, there were two collisions of serious severity and two collisions of slight severity within the specified search area during the study period. There were no fatal collisions reported within the search area during the 6 year period.
- 2.7.4 Based on the narrative, the collisions of serious severity occurred as a vehicle collided with a goods vehicle along Humber Doucy, with a child being injured; and a vehicle collided with a cyclist at the Humber Doucy Lane / Rushmere Road / The Street Rushmere roundabout.
- 2.7.5 The collisions of slight severity were due to a motorcyclist crashing after passing a stationary vehicle; and a vehicle with an inexperienced driver crashing along Humber Doucy Lane (no other vehicles were involved in the collision).

- 2.7.6 Based on the low number of collisions and their spread throughout the study area over the latest six-year period, it is concluded that there is no evidence to suggest that the proposed development will have a detrimental impact on highway safety.

## 2.8 Modal Share

- 2.8.1 The current modal split has been obtained from the 2011 Census data for “Method of Travel to Work” for the Rushmere St Andrew ward (E050007218), where the development is located. This travel data has been summarised below in **Table 2.3**.

**Table 2.3: Modal Share – Rushmere St Andrew Ward**

| Method of Travel to Work             | Modal Split |
|--------------------------------------|-------------|
| Underground, metro, light rail, tram | 0%          |
| Train                                | 3%          |
| Bus, minibus or coach                | 4%          |
| Taxi                                 | 0%          |
| Motorcycle, scooter or moped         | 1%          |
| Driving a car or van                 | 76%         |
| Passenger in a car or a van          | 5%          |
| Bicycle                              | 5%          |
| On foot                              | 5%          |
| Other method of travel to work       | 1%          |
| <b>Total</b>                         | <b>100%</b> |

- 2.8.2 The table above indicates that 81% of people in the Rushmere St Andrew ward currently travel to work by car, of which 76% are single occupancy car trips. Sustainable trips comprise of 5% walking to work, 3% using the train, 5% cycle to work and 4% use the bus. This indicates that by improving walking, cycling and public transport facilities to connect the site to the local area could provide an excellent opportunity to shift travel behaviours towards more sustainable modes of travel and reduce reliance on the car, particularly single occupancy car trips.
- 2.8.3 Consequently, the promotion of this site will assist in encouraging new and existing residents within the area to travel by sustainable modes of transport. This will be supported by preparing a Travel Plan to set out realistic measures to reduce the number of single-occupancy vehicle trips generated as a result of the development. It will also propose methods for implementing and monitoring the Travel Plan to achieve this modal shift. The Travel Plan can then be implemented for the wider site to help promote

sustainable transport for a greater audience. Some of the key measures that could be implemented are explored further in **Chapter 5**.

## 3 Access Strategy and Parking Standards

### 3.1 Introduction

3.1.1 The following section takes into consideration the existing transportation infrastructure outlined in previous chapters and explores the deliverability of the Phase 1 development at Humber Doucy Lane.

### 3.2 Access Strategy

3.2.1 Currently, it is proposed to deliver up to 200 dwellings as part of the first phase of the development with site access proposed via Humber Doucy Lane. The Phase 1 site already benefits from agricultural access onto Humber Doucy Lane. This will need to be widened and formalised as part of any development proposals.

3.2.2 To understand SCC access requirements to serve the development, the design guidance set out within Suffolk County Council has been reviewed. This outlines the size and scale of access roads for developments based on the proposed number of dwellings.

3.2.3 The SCC Design Guide states that Major Access Roads would be suitable for residential developments and roads serving more than 150 and up to 300 dwellings, and the following criteria should be met:

- “Two points of access should be provided to the part of the site being served and the road layout should conveniently connect those points of access”;
- ‘Where only one point of access is available, the road layout should form a circuit and there should be the shortest practical connection between this circuit and the point of access. This should always form the stem of a T-junction’; and
- “The minimum spacing between junctions should be 50m”.

3.2.4 The site proposes to provide a T-junction onto Humber Doucy Lane. A loop road within the site approximately 50m north of Humber Doucy Lane will provide a circuit within the internal road network.

3.2.5 In addition, a secondary emergency access point will be provided via the PRoW on the western boundary of the site.

3.2.6 The proposed site access will be positioned slightly north of the existing access point in order to ensure 50m junction separation with the Humber Doucy Lane / Dumbarton junction.

### 3.3 Background Traffic flows

3.3.1 To determine the current traffic volumes on Humber Doucy Lane and to inform the site access design, baseline traffic flows and vehicle speeds have been determined via an Automated Traffic Count survey (ATC), undertaken over a consecutive 7-day period (12/07/19 –18/07/19) in the vicinity of the proposed site access. Currently the speed limit on Humber Doucy Lane is 30mph.

3.3.2 The ATC survey results have been analysed to calculate 85<sup>th</sup> percentile speeds and subsequently used to derive appropriate visibility splays, in line with the Manual for Streets (MfS) guidance. The 85<sup>th</sup> percentile speeds identified within the survey are included in **Table 3.1** below for reference.

**Table 3.1: 85<sup>th</sup> percentile speeds and MfS Visibility Requirements**

| Direction  | 85 <sup>th</sup> percentile speed | MfS Visibility Requirements |
|------------|-----------------------------------|-----------------------------|
| Northbound | 30.4mph                           | 43.8m                       |
| Southbound | 34.7mph                           | 53.4m                       |

3.3.3 The proposed access junction arrangement has been shown on **Drawing J32-4587-PS-001**, which demonstrates that the required horizontal visibility splays can be achieved. This has been designed in line with guidance set out about from the Suffolk Design Guide for Residential Areas and from the Manual for Streets (MfS) and can be delivered in line with this guidance.

### 3.4 Swept Path Analysis

3.4.1 In addition to the above, swept path analysis has been undertaken to ensure that a refuse vehicle would be able to access and egress the proposed Phase 1 development in a forward gear. A Traffic Regulation Order (TRO) in the form of yellow lines has been included within the access design to protect the access from potential on-street parking. The swept path analysis assessment is shown on **Drawing J32-4587-PS-002**.

### 3.5 Cycleways and Pedestrian Routes

3.5.1 The SCC design guide comments that for larger residential housing schemes, joint pedestrian and cycle routes should link housing areas with community facilities, schools, shopping and places of employment. Further, the footpath layout should meet the needs of elderly people. These routes need to be carefully positioned and designed in order that their use will be maximised.

3.5.2 When the provision of a footpath or footway is required it will be necessary to ensure that it is sufficiently wide and well aligned to:

- Avoid the need for pedestrians when passing each other to step out into bus carriageways or to cause damage to planted areas;
- Allow for ramped crossing to garage drives or parking spaces;
- Allow, when necessary, for occasional access along footpath by emergency vehicles; and
- Provide for statutory and another services underground.

3.5.3 Major routes will link to housing areas with schools, shopping centre and employment areas. The absolute minimum width should be:

- Cycleway – 2 metres;
- Footway – 1.8 metres.

3.5.4 The internal road network for the Phase 1 development will be designed to provide 2m footways on both sides of the carriageway throughout the site, as well as providing links to the existing PRoW network shown within **Figure 2.4** and existing footways along Humber Doucy Lane.

### 3.6 Providing for people with disabilities

3.6.1 Access to any development should be available to all sections of the community. With this in mind, the following provisions should be considered:

- Suitable access routes for wheelchairs and the marking out of parking spaces close to pedestrian entrances;
- At all road junctions for pedestrians to cross the minor road with a minimum of inconvenience. Kerbs should, therefore, be dropped flush with the carriageway and tactile paving provided at all junctions;
- Firm, non-slip surfaces and options that avoid steps; and
- Particular attention should be paid to the locations at which pedestrian routes cross the carriageway so that footway and footpath users are not exposed to unexpected dangers.

3.6.2 The highway network within the site will be designed in line with the above to ensure accessibility for all users.

### 3.7 Parking Standards

3.7.1 SCC outline the parking standards that should be followed within the curtilage of new developments within the SCC Suffolk Guidance for Parking, Technical Guidance (Third Edition) May 2019. The relevant standards are detailed within **Table 3.2** below.

**Table 3.2: SCC Parking Standards**

| Land Use                | Car Parking (minimum)  | Cycle Parking (minimum)                                                                                                                   |
|-------------------------|------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| 1 Bedroom House or Flat | 1 space per dwelling   |                                                                                                                                           |
| 2 Bedroom House or Flat | 2 spaces per dwelling* | 2 secure covered spaces per dwelling. (Satisfied if garage or secure area is provided within curtilage of dwelling to minimum dimensions) |
| 3 Bedroom House or Flat | 2 spaces per dwelling  |                                                                                                                                           |
| 4 Bedroom House or Flat | 3 spaces per dwelling  |                                                                                                                                           |

\*reduction in this figure may be considered with a robust and degreeed highway mitigation

3.7.2 The parking guidance also contains information regarding the size and quantum of cycle parking that should be included for new residential developments. Thus, any planning application for Phase 1 and/or the wider site should adhere to this guidance.

### 3.8 Potential Constraints for Phase 1

3.8.1 As previously noted, there are various parcels of land along Humber Doucy Lane identified within both the Suffolk Coastal and Ipswich Local Plan SHELAA which refer to potential constraints of the area within the vicinity of Humber Doucy Lane.

3.8.2 In terms of highways, one of the key constraints is the increase in the development in the area impacting the local highway network. In addition, due to the proximity and connectivity of the site to Ipswich, and in order to seek to mitigate any impacts on the surrounding network, it is expected that a robust package

of measures to promote sustainable transport would form part of any proposals, such as a Travel Plan and a strategy to connect the site to the existing PRoW network. This has been explored further in **Chapter 5** of this report.

## 4 Traffic Flows, Trip Generation and Distribution

### 4.1 Introduction

4.1.1 In order to confirm that the site access design discussed within **Chapter 3** will be suitable for the Phase 1 proposal the traffic conditions on the local highway network currently and in the future; the following have been considered:

- Future year traffic growth;
- Development traffic flows and distribution;
- Assessment area and scenarios; and
- Junction capacity assessments.

### 4.2 Trip Generation

- 4.2.1 An assessment has been undertaken to calculate the potential trip generation of the proposed site using the TRICS database (Version 7.6.1). Multi-modal trip rates were obtained using the TRICS database for total persons and vehicle trips. TRICS category '03 –Residential' subcategory 'A – Houses Privately Owned' has been selected for sites ranging between 60 – 300 dwellings that are located within England, excluding Greater London. This search query has returned 20 sites within the TRICS database.
- 4.2.2 The network peak hour people and vehicle trip rates included in **Table 4.1** below. These trip rates have been applied to the development quantum to forecast the trip generation at the site (200 dwellings).

**Table 4.1: Trip Rates and Trip Generation**

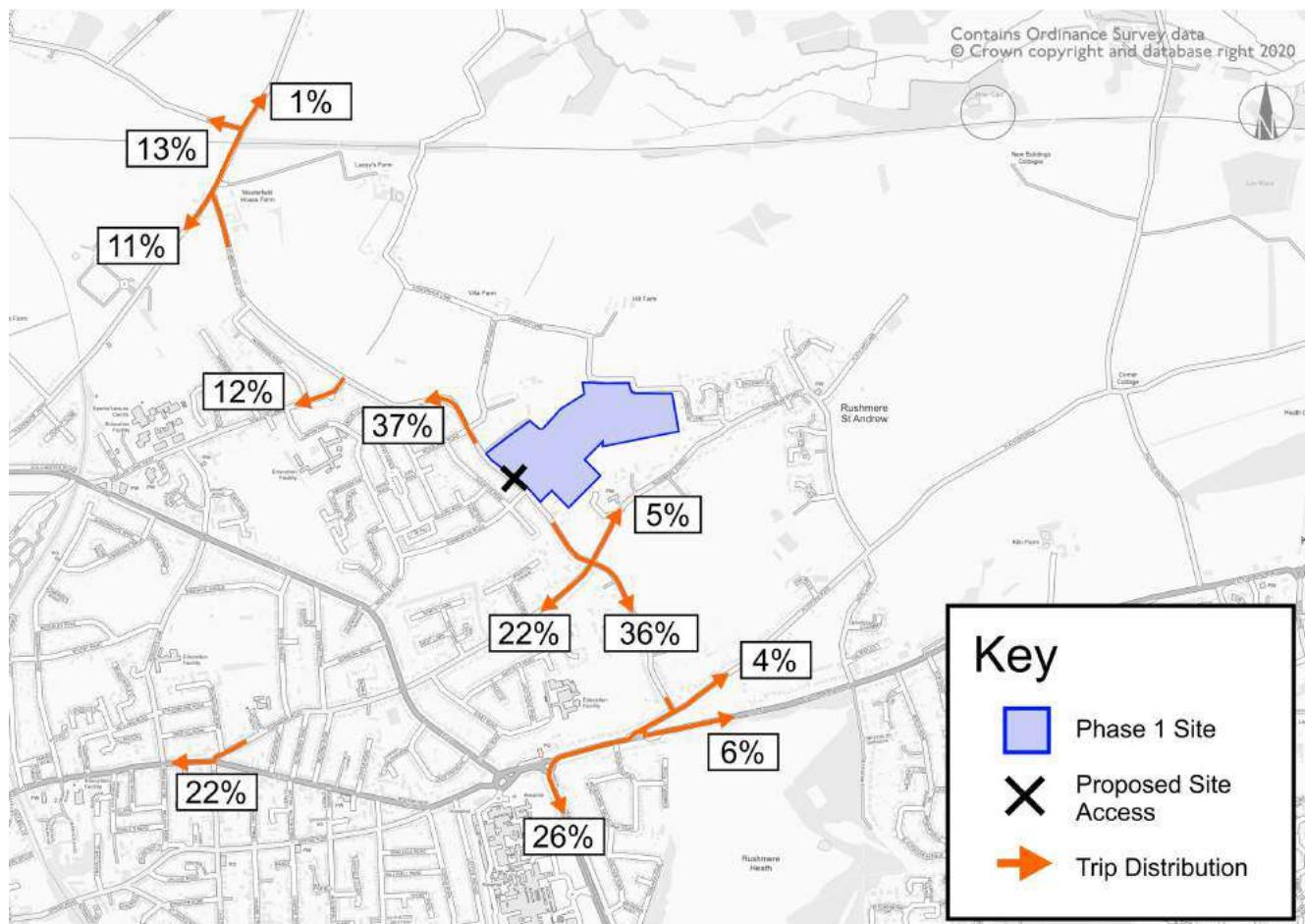
|                        | Weekday AM Peak<br>(08:00-09:00) |            |         | Weekday PM Peak<br>(17:00-18:00) |            |         |
|------------------------|----------------------------------|------------|---------|----------------------------------|------------|---------|
|                        | Arrivals                         | Departures | Two-way | Arrivals                         | Departures | Two-way |
| Total People Trip Rate | 0.176                            | 0.651      | 0.827   | 0.526                            | 0.234      | 0.76    |
| Total People Trips     | 35                               | 130        | 165     | 105                              | 47         | 152     |
| Vehicle Trip Rates     | 0.111                            | 0.332      | 0.443   | 0.299                            | 0.144      | 0.443   |
| Vehicle Trips          | 22                               | 66         | 88      | 60                               | 29         | 89      |

- 4.2.3 **Table 4.1** shows that the site could generate 165 people movements in the morning peak hour, and 155 people movements in the evening peak hour. Of these 88 and 89 two-way vehicle trips could be generated in the AM and PM peaks respectively.

### 4.3 Trip Distribution and Traffic Assignment

- 4.3.1 The forecast vehicular trip generation shown in **Table 4.1** has been distributed and assigned on the local network based on using the Office for National Statistics “Method of Travel to Work” data. **Figure 4.1** below summarises the likely percentage traffic impact from Phase 1 on the local highway network in the network peak hours.

**Figure 4.1: Traffic Distribution**



- 4.3.2 **Figure 4.1** shows that from the proposed site access on Humber Doucy Lane, 37% of trips will head northbound. These trips will route to Sidegate Lane (12%), Westerfield (13%), Tuddenham (1%) and Ipswich (11%). The remaining trips (63%) will head in a southerly direction towards the Humber Doucy Lane / Rushmere Road / The Street Rushmere Junction.
- 4.3.3 Here 22% of trips that head west towards the A1214 and Ipswich Town Centre via Woodbridge Road, 5% will head towards Rushmere Village and 6% will head towards the Humber Doucy Lane / Playford Road junction.
- 4.3.4 Beyond which, 4% of trips will head east on Playford Road towards East Suffolk and 6% of trips will head towards the A1214 eastbound towards the A12, whilst 26% will heading south towards the A1189 south towards Felixstowe.

## 4.4 Committed Developments

- 4.4.1 Currently there are no identified proposed developments within the vicinity of the site that would require to be considered as committed developments as part of the Phase 1 proposal, however this will need be discussed further with Suffolk County Council and Ipswich Borough Council as part of any future planning applications for both the Phase 1.

## 4.5 Future Year Traffic Growth

- 4.5.1 TEMPro v7.2 calibrated with the National Transport (NTM AF15) dataset has been used to generate traffic growth factors specific to the site's MSOA (Ipswich 004) with a base year of 2019. Growth factors for 2020 (assumed year for submission of planning application), 2025 (assumed opening year of the site) and 2036 (end of the Suffolk Coastal Local Plan period) have been derived and are presented in **Table 4.2** below.

**Table 4.2: TEMPro Growth Factors**

| Time Period | 2020 Growth Factor | 2025 Growth Factor | 2036 Growth Factor |
|-------------|--------------------|--------------------|--------------------|
| AM Period   | 1.013              | 1.098              | 1.185              |
| PM Period   | 1.013              | 1.099              | 1.186              |

## 4.6 Assessment Scenarios

- 4.6.1 It is proposed to carry out assessments of the following scenarios for the AM and PM peak hour periods:
- 2020 Future Year + Development (AM and PM peak hour);
  - 2025 Future Year + Development (AM and PM peak hour); and
  - 2036 Future Year + Development (AM and PM peak hour).

## 4.7 Junction Capacity Assessment

- 4.7.1 Industry standard software package, Junctions 9 (PICADY), has been used to assess the capacity of the proposed site access junction.
- 4.7.2 In terms of modelling results, a Ratio of Flow to Capacity (RFC) value of 0.85 or less typically demonstrates that a junction arm or turning movement is operating within practical capacity and is therefore unlikely to experience regular queuing. However, junctions that are operating between 0.85 and 1.00 are considered to be operating within theoretical capacity. Any junction operating over 1.00 is considered to be operating outside of acceptable thresholds of capacity. The queue results are measured in vehicles and the delay results are measured in seconds per vehicle.
- 4.7.3 The baseline flows are discussed in **Section 3.3**. The above TEMPro factors have been applied for the 2019 flows in order to utilise in the junction capacity modelling
- 4.7.4 A summary of the modelling results for the site access junction are presented below in **Table 4.3**, and the full PICADY outputs are included in **Appendix A**.

**Table 4.3: Site Access Junction Capacity Assessment**

| Approach                                | AM Peak Hour (08:00 – 09:00) |      | PM Peak Hour (17:00 – 18:00) |      |
|-----------------------------------------|------------------------------|------|------------------------------|------|
|                                         | Queue (Veh)                  | RFC  | Queue (Veh)                  | RFC  |
| 2020 Baseline + Proposed Development    |                              |      |                              |      |
| Site Access                             | 1                            | 0.09 | 0                            | 0.04 |
| Humber Doucy Lane                       | 0                            | 0.03 | 1                            | 0.09 |
| 2025 Future Year + Proposed Development |                              |      |                              |      |
| Site Access                             | 1                            | 0.09 | 0                            | 0.04 |
| Humber Doucy Lane                       | 0                            | 0.04 | 1                            | 0.09 |
| 2036 Future Year + Proposed Development |                              |      |                              |      |
| Site Access                             | 1                            | 0.09 | 0                            | 0.04 |
| Humber Doucy Lane                       | 1                            | 0.04 | 1                            | 0.09 |

4.7.5 **Table 4.3** above indicates that the proposed site access onto Humber Doucy Lane will operate within practical capacity during the morning and evening peak hour periods for all of the scenarios assessed.

## 4.8 Wider Highway Network Impact

4.8.1 As well as immediate traffic impacts on the proposed site access, the wider distribution pattern detailed within **Figure 4.1** indicates that the delivery of the 200 dwellings for Phase 1 will have a highways impact upon the following key junctions in the local area and will need to be assessed in more detail as part of any future planning application or further study work;

- Humber Doucy Lane / Tuddenham Road Priority Junction;
- Humber Doucy Lane / Rushmere Road / The Street Rushmere Roundabout;
- Humber Doucy Lane / Sidegate Lane priority junction;
- Sidegate Lane West / A1214 Colchester Road junction;
- A1214 Colchester Road / Tuddenham Road Roundabout; and
- Rushmere Road / Colchester Road roundabout.

4.8.2 The traffic impact of the wider site will also need consider the junctions detailed above but due to the possibility of assigning trips to the Ipswich Northern Route (Inner Option), a new traffic distribution and assignment assessment will need to be undertaken if the current position for Suffolk County Council changes.

## 5 Travel Planning

### 5.1 Introduction

- 5.1.1 An important component of delivering a residential development is the provision of appropriate sustainable transport infrastructure and supporting measures to promote the uptake of sustainable transport from the outset.
- 5.1.2 Some of the measures will increase the sustainability of the site by improving the level of public transport and walking/cycling (as discussed in the **Chapter 2**), and as a result will have a longer-term delivery timescale. Other measures will be site specific and can be more readily introduced in order to promote sustainable travel amongst future residents.

### 5.2 Travel Plan

- 5.2.1 The promote travel away from single occupancy vehicles a comprehensive Travel Plan should be delivered as part of the future planning application and will be delivered in line with Suffolk County Council guidance. It is likely that the Travel Plan will include measures such as welcome packs, doctor bike sessions, cycle training and potential subsidies towards public transport tickets and cycle equipment.
- 5.2.2 The Travel Plan will be managed by a dedicated co-ordinator and will be monitored in relation to a series of agreed targets in consultation with East Suffolk Council and Ipswich Borough Council as key stakeholders.

### 5.3 Pedestrian and Cycle Improvements

- 5.3.1 The proposals will include a network of pedestrian and cycle routes throughout the site to link with existing provision in the surrounding area; as including along the existing advisory cycle route along Humber Doucy Lane.
- 5.3.2 In addition, the cycle network will accommodate future provision to connect to the 'Inner' option of the Ipswich Northern Route (if this is route that is progressed). It is anticipated that a 3m cycleway will be provided alongside the carriageway to connect the site towards the A14 and the A12, as well as a number of villages enroute.
- 5.3.3 Cycle parking will be provided to meet the standards prescribed by Suffolk County Council and include visitor parking in public spaces. Complementary infrastructure should also be provided such as fixed bike pumps and tool kits.

### 5.4 Car Clubs

- 5.4.1 Car Clubs could be introduced for the future residents of the development to provide an alternative for those who do not require regular use or ownership. There are potential partnerships with existing providers such as 'Enterprise Rent-a-Car' that should be explored in the future.
- 5.4.2 The benefits of a car club are as follows:
  - Access to vehicles without financial burden of ownership;
  - No maintenance cost;
  - UK wide access; and

- Vehicles can be reserved in advance or last minute.

- 5.4.3 Car clubs typically work by providing residents/customers with an individual membership card to allow instant access to the network of vehicles within the car club. The schemes generally work through a dedicated app, through which residents can book a car when required.
- 5.4.4 A number of car club operators are transferring towards hybrid or electric vehicles which have clear benefits in terms of positively contributing towards the nationwide air quality targets.
- 5.4.5 Typically, there is a membership fee for the year and driving hours are paid for by credits. A developer would generally pre-load membership cards to an agreed level of credits for residents in order to sample the scheme and allow travel habits to form and to adopt to the car club scheme.

## 5.5 Electric Vehicle (EV) Charging Points

- 5.5.1 Local policy guidance seeks to promote electric vehicles by providing the appropriate infrastructure from the outset in order to facilitate use of electric and hybrid vehicles. The proposed site will provide electric vehicle charging facilities in line with current policy guidelines.

## 6 Summary and Conclusion

### 6.1 Summary

- 6.1.1 This transport feasibility study has been prepared on behalf of Bloor Homes in regard to the proposed residential development to the north east of Humber Doucy Lane. The initial land parcel of the development is expected to provide circa 200 dwellings, with the site acting as a possible gateway for a further 1,200 dwellings and a connection to the potential Ipswich Northern Route (Inner Route). Whilst we understand that Suffolk County Council are not proceeding with the next stage of the business case into the Northern Relief Road, as confirmed at the Cabinet meeting on 25th February 2020, should this change in the future, the proposed Site can assist in the delivery of the Road. With Bloor Homes controlling a large part of the land to the north of Humber Doucy Lane, it is uniquely placed to be able to assist in the delivery of a relief road if required in the future.
- 6.1.2 The current situation in terms of sustainable transport has been explored and the key findings are summarised below:
- There are numerous local amenities accessible for the new residents to use however, should the full quantum of development come forward (up to 1,400 dwellings) it will be necessary to include additional local amenities within the proposals;
  - Following a review of the most recent Personal Injury Collision records, there is no evidence to show the proposed development will have a detrimental impact on highway safety;
  - The pedestrian and cycle networks surrounding the Phase 1 development are of good quality, and the site is accessible from the existing bus services located along Humber Doucy Lane; and
  - Derby Road and Westerfield Rail Stations are accessible from the site and allow connection to Felixstowe, Ipswich and Lowestoft.
- 6.1.3 The Phase 1 site is proposed to be accessed via T-junction of Humber Doucy Lane. The access will include with a loop road within the site approximately 50m north of the access, providing a circuit appropriate to serve the development. In addition, the existing PROW route will be upgraded to provide a secondary emergency access on the western boundary of the site.
- 6.1.4 The proposed access junction arrangement shown on **Drawing J32-4587-PS-001**, demonstrating the appropriate horizontal visibility splays can be achieved. This access is in line with guidance set out in the Suffolk Design Guide for Residential Areas and Manual for Streets (MfS). Furthermore, through junction modelling to be suitable to provide safe access for residents of the proposed development, without negatively impacting existing nearby residents.
- 6.1.5 A trip generation and distribution exercise has been undertaken which has identified that the development traffic will head towards Ipswich Town Centre to the south west, the A14 to the west and A12 to the east via Humber Doucy Lane (as well as other villages enroute). Furthermore, the development traffic could be further distributed along additional routes if the inner option of the Ipswich Northern Route is progressed, as the proposed alignment currently passes through the wider site (just south of the railway line) and would provide the option for residents to access the bypass directly.

- 6.1.6 As part of a future planning application for Phase 1, a Travel Plan (TP) will be submitted which will set out the key aim of reducing the number of single-occupancy vehicle trips generated as a result of the development. It will also include proposals methods for implementing and monitoring the TP to achieve a modal shift. This TP can then be developed further for the wider site to provide a comprehensive sustainable transport strategy to help promote sustainable transport for the site.

## 6.2 Conclusion

- 6.2.1 In conclusion it has been demonstrated that the site could deliver a significant volume of residential development that would have access to a range of sustainable modes of transport. The proposals have been reviewed in line with the NPPF, SCC and other national best practice guidance documents and have been found to be in accordance with the transportation related policy contained within.

## APPENDICES

This drawing has been produced by mode transport planning.  
No responsibility will be accepted for the use of this drawing in any other project.  
DO NOT SCALE OFF THIS DRAWING.



visi 2.4m x 53.4m (34.7mph - MfS)

R11.0

2.0  
6.3  
2.0

HUMBER DOUCY LANE

279

Footpath to provide tactile crossing points to existing footway provision.

Proposed extent of double-yellow line restriction in order to assure refuse vehicle can manoeuvre into the site without obstruction see drawing J32-4483-PS-002

visi 2.4m x 43.8m (30.3mph - MfS)

drawing title

Indicative Access Design & Horizontal Visibility Splays

client

Bloor Homes

job title

Land off Humber Doucy Lane, Ipswich

mode transport planning

LABS Atrium  
Stables Market  
Chalk Farm Road  
London  
NW1 8AH

t 020 7293 0217  
e info@modetransport.co.uk  
w www.modetransport.co.uk

mode  
transport planning

scale 1:500@A3

drawn

mf

B

A

21-02-20  
31-07-19

Revised Footway  
Issued

checked

pt

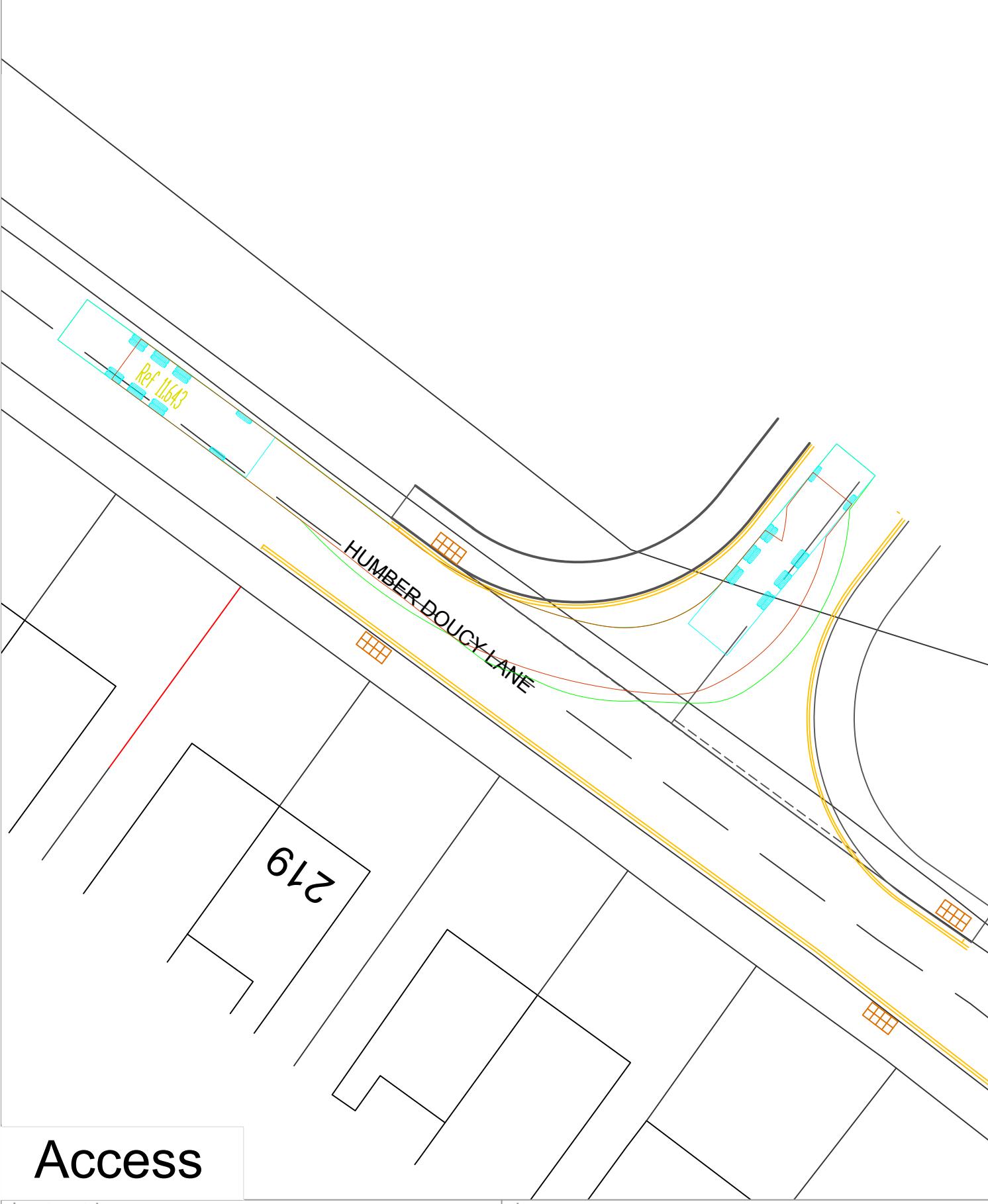
created

July 19

drawing no.

J32-4483-PS-001

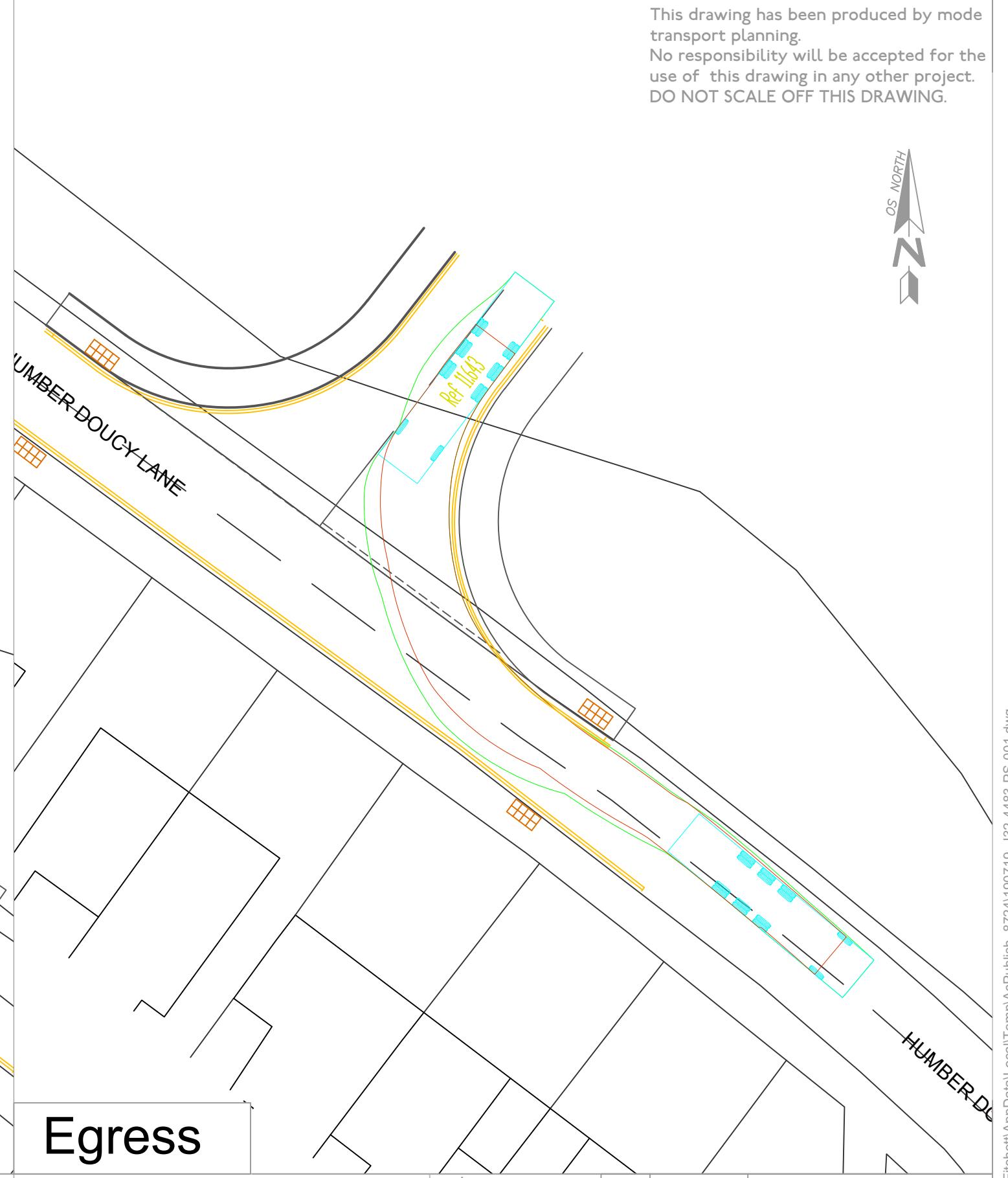
This drawing has been produced by mode transport planning.  
No responsibility will be accepted for the use of this drawing in any other project.  
DO NOT SCALE OFF THIS DRAWING.



drawing title  
**Refuse Vehicle Swept Path Analysis**  
Ref 11.643

Overall length 11.643m  
Overall width 2.500m  
Overall Body Height 3.751m  
Min Body Ground Clearance 0.304m  
Track Width 2.500m  
Lock to lock time 4.45s  
Wall to Wall Turning Radius 11.250m

client  
**Bloor Homes**  
job title  
**Land off Humber Doucy Lane, Ipswich**



**mode**  
transport planning

mode transport planning  
LABS Atrium  
Stables Market  
Chalk Farm Road  
London  
NW1 8AH  
t 020 7293 0217  
e info@modetransport.co.uk  
w www.modetransport.co.uk

scale **1:250@A3**  
drawn **mf**  
checked **pt**  
created **July 19**  
drawing no. **J32-4483-PS-002**

# APPENDIX A - Site Access Modelling results

| <b>Junctions 9</b>                                                                                                                                                      |  |  |  |  |  |  |  |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|--|--|--|--|
| <b>PICADY 9 - Priority Intersection Module</b>                                                                                                                          |  |  |  |  |  |  |  |  |
| Version: 9.0.2.5947                                                                                                                                                     |  |  |  |  |  |  |  |  |
| © Copyright TRL Limited, 2017                                                                                                                                           |  |  |  |  |  |  |  |  |
| For sales and distribution information, program advice and maintenance, contact TRL:<br>+44 (0)1344 770558 software@trl.co.uk www.trlsoftware.co.uk                     |  |  |  |  |  |  |  |  |
| <b>The users of this computer program for the solution of an engineering problem are in no way relieved of their responsibility for the correctness of the solution</b> |  |  |  |  |  |  |  |  |

**Filename:** 190724\_Site Access.j9

**Path:** C:\Users\Mode\Dropbox (mode)\Project\London\2. Projects\J324483\_Humber Doucy Lane, Ipswich\4. Data

**Report generation date:** 01/08/2019 12:48:52

- » 2019 + Dev, AM
- » 2019 + Dev, PM
- » 2024 + Dev, AM
- » 2024 + Dev, PM
- » 2036 + Dev, AM
- » 2036 + Dev, PM

#### Summary of junction performance

|                   | AM          |           |      |     | PM          |           |      |     |
|-------------------|-------------|-----------|------|-----|-------------|-----------|------|-----|
|                   | Queue (Veh) | Delay (s) | RFC  | LOS | Queue (Veh) | Delay (s) | RFC  | LOS |
| <b>2019 + Dev</b> |             |           |      |     |             |           |      |     |
| Stream B-C        | 0.1         | 7.58      | 0.08 | A   | 0.0         | 6.86      | 0.03 | A   |
| Stream B-A        | 0.0         | 11.23     | 0.02 | B   | 0.0         | 10.28     | 0.01 | B   |
| Stream C-AB       | 0.0         | 5.10      | 0.03 | A   | 0.1         | 5.69      | 0.08 | A   |
| <b>2024 + Dev</b> |             |           |      |     |             |           |      |     |
| Stream B-C        | 0.1         | 7.56      | 0.08 | A   | 0.0         | 6.92      | 0.03 | A   |
| Stream B-A        | 0.0         | 11.47     | 0.02 | B   | 0.0         | 10.51     | 0.01 | B   |
| Stream C-AB       | 0.0         | 4.91      | 0.04 | A   | 0.1         | 5.63      | 0.08 | A   |
| <b>2036 + Dev</b> |             |           |      |     |             |           |      |     |
| Stream B-C        | 0.1         | 7.68      | 0.08 | A   | 0.0         | 7.01      | 0.03 | A   |
| Stream B-A        | 0.0         | 11.90     | 0.02 | B   | 0.0         | 10.77     | 0.01 | B   |
| Stream C-AB       | 0.1         | 4.84      | 0.04 | A   | 0.1         | 5.59      | 0.08 | A   |

There are warnings associated with one or more model runs - see the 'Data Errors and Warnings' tables for each Analysis or Demand Set.

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

## File summary

### File Description

|                    |                       |
|--------------------|-----------------------|
| <b>Title</b>       |                       |
| <b>Location</b>    |                       |
| <b>Site number</b> |                       |
| <b>Date</b>        | 24/07/2019            |
| <b>Version</b>     |                       |
| <b>Status</b>      | (new file)            |
| <b>Identifier</b>  |                       |
| <b>Client</b>      |                       |
| <b>Jobnumber</b>   |                       |
| <b>Enumerator</b>  | DESKTOP-CE95GQI\ModeT |
| <b>Description</b> |                       |

## Units

| Distance units | Speed units | Traffic units input | Traffic units results | Flow units | Average delay units | Total delay units | Rate of delay units |
|----------------|-------------|---------------------|-----------------------|------------|---------------------|-------------------|---------------------|
| m              | kph         | Veh                 | Veh                   | perHour    | s                   | -Min              | perMin              |

## Analysis Options

| Vehicle length (m) | Calculate Queue Percentiles | Calculate detailed queueing delay | Calculate residual capacity | RFC Threshold | Average Delay threshold (s) | Queue threshold (PCU) |
|--------------------|-----------------------------|-----------------------------------|-----------------------------|---------------|-----------------------------|-----------------------|
| 5.75               |                             |                                   |                             | 0.85          | 36.00                       | 20.00                 |

## Demand Set Summary

| ID | Scenario name | Time Period name | Traffic profile type | Start time (HH:mm) | Finish time (HH:mm) | Time segment length (min) | Run automatically |
|----|---------------|------------------|----------------------|--------------------|---------------------|---------------------------|-------------------|
| D3 | 2019 + Dev    | AM               | ONE HOUR             | 07:45              | 09:15               | 15                        | ✓                 |
| D4 | 2019 + Dev    | PM               | ONE HOUR             | 16:45              | 18:15               | 15                        | ✓                 |
| D5 | 2024 + Dev    | AM               | ONE HOUR             | 07:45              | 09:15               | 15                        | ✓                 |
| D6 | 2024 + Dev    | PM               | ONE HOUR             | 16:45              | 18:15               | 15                        | ✓                 |
| D7 | 2036 + Dev    | AM               | ONE HOUR             | 07:45              | 09:15               | 15                        | ✓                 |
| D8 | 2036 + Dev    | PM               | ONE HOUR             | 16:45              | 18:15               | 15                        | ✓                 |

## Analysis Set Details

| ID | Include in report | Network flow scaling factor (%) | Network capacity scaling factor (%) |
|----|-------------------|---------------------------------|-------------------------------------|
| A1 | ✓                 | 100.000                         | 100.000                             |

# 2019 + Dev, AM

## Data Errors and Warnings

| Severity | Area            | Item                                           | Description                                                                                                                 |
|----------|-----------------|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| Warning  | Minor arm flare | B - Site Access - Minor arm geometry           | Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed. |
| Warning  | Major arm width | C - Humber Doucy Lane (S) - Major arm geometry | For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.        |

## Results

### Results Summary for whole modelled period

| Stream | Max RFC | Max delay (s) | Max Queue (Veh) | Max LOS | Average Demand (Veh/hr) | Total Junction Arrivals (Veh) |
|--------|---------|---------------|-----------------|---------|-------------------------|-------------------------------|
| B-C    | 0.08    | 7.58          | 0.1             | A       | 35                      | 52                            |
| B-A    | 0.02    | 11.23         | 0.0             | B       | 6                       | 8                             |
| C-AB   | 0.03    | 5.10          | 0.0             | A       | 20                      | 30                            |
| C-A    |         |               |                 |         | 248                     | 372                           |
| A-B    |         |               |                 |         | 2                       | 3                             |
| A-C    |         |               |                 |         | 281                     | 421                           |

### Main Results for each time segment

#### 07:45 - 08:00

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 29                    | 7                       | 544               | 0.053 | 28                  | 0.0               | 0.1             | 6.984     | A   |
| B-A    | 5                     | 1                       | 364               | 0.012 | 4                   | 0.0               | 0.0             | 9.998     | A   |
| C-AB   | 15                    | 4                       | 722               | 0.021 | 15                  | 0.0               | 0.0             | 5.093     | A   |
| C-A    | 205                   | 51                      |                   |       | 205                 |                   |                 |           |     |
| A-B    | 2                     | 0.38                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 230                   | 58                      |                   |       | 230                 |                   |                 |           |     |

#### 08:00 - 08:15

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 34                    | 9                       | 532               | 0.064 | 34                  | 0.1               | 0.1             | 7.225     | A   |
| B-A    | 5                     | 1                       | 349               | 0.015 | 5                   | 0.0               | 0.0             | 10.481    | B   |
| C-AB   | 19                    | 5                       | 739               | 0.026 | 19                  | 0.0               | 0.0             | 4.998     | A   |
| C-A    | 243                   | 61                      |                   |       | 243                 |                   |                 |           |     |
| A-B    | 2                     | 0.45                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 275                   | 69                      |                   |       | 275                 |                   |                 |           |     |

**08:15 - 08:30**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 42                    | 10                      | 517               | 0.081 | 42                  | 0.1               | 0.1             | 7.577     | A   |
| B-A    | 7                     | 2                       | 327               | 0.020 | 7                   | 0.0               | 0.0             | 11.228    | B   |
| C-AB   | 26                    | 6                       | 764               | 0.034 | 26                  | 0.0               | 0.0             | 4.874     | A   |
| C-A    | 296                   | 74                      |                   |       | 296                 |                   |                 |           |     |
| A-B    | 2                     | 0.55                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 337                   | 84                      |                   |       | 337                 |                   |                 |           |     |

**08:30 - 08:45**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 42                    | 10                      | 517               | 0.081 | 42                  | 0.1               | 0.1             | 7.578     | A   |
| B-A    | 7                     | 2                       | 327               | 0.020 | 7                   | 0.0               | 0.0             | 11.229    | B   |
| C-AB   | 26                    | 6                       | 764               | 0.034 | 26                  | 0.0               | 0.0             | 4.876     | A   |
| C-A    | 296                   | 74                      |                   |       | 296                 |                   |                 |           |     |
| A-B    | 2                     | 0.55                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 337                   | 84                      |                   |       | 337                 |                   |                 |           |     |

**08:45 - 09:00**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 34                    | 9                       | 532               | 0.064 | 34                  | 0.1               | 0.1             | 7.227     | A   |
| B-A    | 5                     | 1                       | 349               | 0.015 | 5                   | 0.0               | 0.0             | 10.484    | B   |
| C-AB   | 19                    | 5                       | 739               | 0.026 | 19                  | 0.0               | 0.0             | 5.002     | A   |
| C-A    | 243                   | 61                      |                   |       | 243                 |                   |                 |           |     |
| A-B    | 2                     | 0.45                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 275                   | 69                      |                   |       | 275                 |                   |                 |           |     |

**09:00 - 09:15**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 29                    | 7                       | 544               | 0.053 | 29                  | 0.1               | 0.1             | 6.992     | A   |
| B-A    | 5                     | 1                       | 364               | 0.012 | 5                   | 0.0               | 0.0             | 10.000    | B   |
| C-AB   | 15                    | 4                       | 722               | 0.021 | 15                  | 0.0               | 0.0             | 5.097     | A   |
| C-A    | 205                   | 51                      |                   |       | 205                 |                   |                 |           |     |
| A-B    | 2                     | 0.38                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 230                   | 58                      |                   |       | 230                 |                   |                 |           |     |

# 2019 + Dev, PM

## Data Errors and Warnings

| Severity | Area            | Item                                           | Description                                                                                                                 |
|----------|-----------------|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| Warning  | Minor arm flare | B - Site Access - Minor arm geometry           | Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed. |
| Warning  | Major arm width | C - Humber Doucy Lane (S) - Major arm geometry | For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.        |

## Results

### Results Summary for whole modelled period

| Stream | Max RFC | Max delay (s) | Max Queue (Veh) | Max LOS | Average Demand (Veh/hr) | Total Junction Arrivals (Veh) |
|--------|---------|---------------|-----------------|---------|-------------------------|-------------------------------|
| B-C    | 0.03    | 6.86          | 0.0             | A       | 14                      | 21                            |
| B-A    | 0.01    | 10.28         | 0.0             | B       | 3                       | 4                             |
| C-AB   | 0.08    | 5.69          | 0.1             | A       | 41                      | 62                            |
| C-A    |         |               |                 |         | 180                     | 270                           |
| A-B    |         |               |                 |         | 5                       | 7                             |
| A-C    |         |               |                 |         | 211                     | 317                           |

### Main Results for each time segment

#### 16:45 - 17:00

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 11                    | 3                       | 562               | 0.020 | 11                  | 0.0               | 0.0             | 6.540     | A   |
| B-A    | 2                     | 0.56                    | 385               | 0.006 | 2                   | 0.0               | 0.0             | 9.409     | A   |
| C-AB   | 32                    | 8                       | 663               | 0.048 | 31                  | 0.0               | 0.1             | 5.695     | A   |
| C-A    | 150                   | 37                      |                   |       | 150                 |                   |                 |           |     |
| A-B    | 4                     | 1                       |                   |       | 4                   |                   |                 |           |     |
| A-C    | 173                   | 43                      |                   |       | 173                 |                   |                 |           |     |

#### 17:00 - 17:15

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 13                    | 3                       | 553               | 0.024 | 13                  | 0.0               | 0.0             | 6.669     | A   |
| B-A    | 3                     | 0.67                    | 372               | 0.007 | 3                   | 0.0               | 0.0             | 9.755     | A   |
| C-AB   | 40                    | 10                      | 677               | 0.059 | 40                  | 0.1               | 0.1             | 5.657     | A   |
| C-A    | 177                   | 44                      |                   |       | 177                 |                   |                 |           |     |
| A-B    | 4                     | 1                       |                   |       | 4                   |                   |                 |           |     |
| A-C    | 207                   | 52                      |                   |       | 207                 |                   |                 |           |     |

**17:15 - 17:30**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 17                    | 4                       | 542               | 0.030 | 16                  | 0.0               | 0.0             | 6.855     | A   |
| B-A    | 3                     | 0.83                    | 354               | 0.009 | 3                   | 0.0               | 0.0             | 10.276    | B   |
| C-AB   | 53                    | 13                      | 696               | 0.076 | 53                  | 0.1               | 0.1             | 5.603     | A   |
| C-A    | 213                   | 53                      |                   |       | 213                 |                   |                 |           |     |
| A-B    | 6                     | 1                       |                   |       | 6                   |                   |                 |           |     |
| A-C    | 253                   | 63                      |                   |       | 253                 |                   |                 |           |     |

**17:30 - 17:45**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 17                    | 4                       | 542               | 0.031 | 17                  | 0.0               | 0.0             | 6.855     | A   |
| B-A    | 3                     | 0.83                    | 354               | 0.009 | 3                   | 0.0               | 0.0             | 10.276    | B   |
| C-AB   | 53                    | 13                      | 696               | 0.076 | 53                  | 0.1               | 0.1             | 5.596     | A   |
| C-A    | 213                   | 53                      |                   |       | 213                 |                   |                 |           |     |
| A-B    | 6                     | 1                       |                   |       | 6                   |                   |                 |           |     |
| A-C    | 253                   | 63                      |                   |       | 253                 |                   |                 |           |     |

**17:45 - 18:00**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 13                    | 3                       | 553               | 0.024 | 14                  | 0.0               | 0.0             | 6.672     | A   |
| B-A    | 3                     | 0.67                    | 372               | 0.007 | 3                   | 0.0               | 0.0             | 9.758     | A   |
| C-AB   | 40                    | 10                      | 677               | 0.059 | 40                  | 0.1               | 0.1             | 5.647     | A   |
| C-A    | 177                   | 44                      |                   |       | 177                 |                   |                 |           |     |
| A-B    | 4                     | 1                       |                   |       | 4                   |                   |                 |           |     |
| A-C    | 207                   | 52                      |                   |       | 207                 |                   |                 |           |     |

**18:00 - 18:15**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 11                    | 3                       | 562               | 0.020 | 11                  | 0.0               | 0.0             | 6.541     | A   |
| B-A    | 2                     | 0.56                    | 385               | 0.006 | 2                   | 0.0               | 0.0             | 9.413     | A   |
| C-AB   | 32                    | 8                       | 664               | 0.048 | 32                  | 0.1               | 0.1             | 5.693     | A   |
| C-A    | 150                   | 37                      |                   |       | 150                 |                   |                 |           |     |
| A-B    | 4                     | 1                       |                   |       | 4                   |                   |                 |           |     |
| A-C    | 173                   | 43                      |                   |       | 173                 |                   |                 |           |     |

# 2024 + Dev, AM

## Data Errors and Warnings

| Severity | Area            | Item                                           | Description                                                                                                                 |
|----------|-----------------|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| Warning  | Minor arm flare | B - Site Access - Minor arm geometry           | Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed. |
| Warning  | Major arm width | C - Humber Doucy Lane (S) - Major arm geometry | For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.        |

## Results

### Results Summary for whole modelled period

| Stream | Max RFC | Max delay (s) | Max Queue (Veh) | Max LOS | Average Demand (Veh/hr) | Total Junction Arrivals (Veh) |
|--------|---------|---------------|-----------------|---------|-------------------------|-------------------------------|
| B-C    | 0.08    | 7.56          | 0.1             | A       | 35                      | 52                            |
| B-A    | 0.02    | 11.47         | 0.0             | B       | 6                       | 8                             |
| C-AB   | 0.04    | 4.91          | 0.0             | A       | 22                      | 32                            |
| C-A    |         |               |                 |         | 295                     | 443                           |
| A-B    |         |               |                 |         | 2                       | 3                             |
| A-C    |         |               |                 |         | 276                     | 414                           |

### Main Results for each time segment

#### 07:45 - 08:00

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 29                    | 7                       | 544               | 0.053 | 28                  | 0.0               | 0.1             | 6.972     | A   |
| B-A    | 5                     | 1                       | 360               | 0.013 | 4                   | 0.0               | 0.0             | 10.127    | B   |
| C-AB   | 16                    | 4                       | 749               | 0.021 | 16                  | 0.0               | 0.0             | 4.907     | A   |
| C-A    | 244                   | 61                      |                   |       | 244                 |                   |                 |           |     |
| A-B    | 2                     | 0.38                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 227                   | 57                      |                   |       | 227                 |                   |                 |           |     |

#### 08:00 - 08:15

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 34                    | 9                       | 533               | 0.064 | 34                  | 0.1               | 0.1             | 7.210     | A   |
| B-A    | 5                     | 1                       | 343               | 0.016 | 5                   | 0.0               | 0.0             | 10.650    | B   |
| C-AB   | 21                    | 5                       | 772               | 0.027 | 20                  | 0.0               | 0.0             | 4.786     | A   |
| C-A    | 290                   | 72                      |                   |       | 290                 |                   |                 |           |     |
| A-B    | 2                     | 0.45                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 271                   | 68                      |                   |       | 271                 |                   |                 |           |     |

**08:15 - 08:30**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 42                    | 10                      | 518               | 0.081 | 42                  | 0.1               | 0.1             | 7.557     | A   |
| B-A    | 7                     | 2                       | 321               | 0.021 | 7                   | 0.0               | 0.0             | 11.468    | B   |
| C-AB   | 28                    | 7                       | 805               | 0.035 | 28                  | 0.0               | 0.0             | 4.630     | A   |
| C-A    | 352                   | 88                      |                   |       | 352                 |                   |                 |           |     |
| A-B    | 2                     | 0.55                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 331                   | 83                      |                   |       | 331                 |                   |                 |           |     |

**08:30 - 08:45**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 42                    | 10                      | 518               | 0.081 | 42                  | 0.1               | 0.1             | 7.558     | A   |
| B-A    | 7                     | 2                       | 321               | 0.021 | 7                   | 0.0               | 0.0             | 11.468    | B   |
| C-AB   | 28                    | 7                       | 805               | 0.035 | 28                  | 0.0               | 0.0             | 4.632     | A   |
| C-A    | 352                   | 88                      |                   |       | 352                 |                   |                 |           |     |
| A-B    | 2                     | 0.55                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 331                   | 83                      |                   |       | 331                 |                   |                 |           |     |

**08:45 - 09:00**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 34                    | 9                       | 533               | 0.064 | 34                  | 0.1               | 0.1             | 7.215     | A   |
| B-A    | 5                     | 1                       | 343               | 0.016 | 5                   | 0.0               | 0.0             | 10.653    | B   |
| C-AB   | 21                    | 5                       | 772               | 0.027 | 21                  | 0.0               | 0.0             | 4.790     | A   |
| C-A    | 290                   | 72                      |                   |       | 290                 |                   |                 |           |     |
| A-B    | 2                     | 0.45                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 271                   | 68                      |                   |       | 271                 |                   |                 |           |     |

**09:00 - 09:15**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 29                    | 7                       | 544               | 0.053 | 29                  | 0.1               | 0.1             | 6.980     | A   |
| B-A    | 5                     | 1                       | 360               | 0.013 | 5                   | 0.0               | 0.0             | 10.129    | B   |
| C-AB   | 16                    | 4                       | 749               | 0.021 | 16                  | 0.0               | 0.0             | 4.909     | A   |
| C-A    | 244                   | 61                      |                   |       | 244                 |                   |                 |           |     |
| A-B    | 2                     | 0.38                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 227                   | 57                      |                   |       | 227                 |                   |                 |           |     |

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## Data Errors and Warnings

| Severity | Area            | Item                                           | Description                                                                                                                 |
|----------|-----------------|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| Warning  | Minor arm flare | B - Site Access - Minor arm geometry           | Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed. |
| Warning  | Major arm width | C - Humber Doucy Lane (S) - Major arm geometry | For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.        |

## Results

### Results Summary for whole modelled period

| Stream | Max RFC | Max delay (s) | Max Queue (Veh) | Max LOS | Average Demand (Veh/hr) | Total Junction Arrivals (Veh) |
|--------|---------|---------------|-----------------|---------|-------------------------|-------------------------------|
| B-C    | 0.03    | 6.92          | 0.0             | A       | 14                      | 21                            |
| B-A    | 0.01    | 10.51         | 0.0             | B       | 3                       | 4                             |
| C-AB   | 0.08    | 5.63          | 0.1             | A       | 43                      | 64                            |
| C-A    |         |               |                 |         | 197                     | 296                           |
| A-B    |         |               |                 |         | 5                       | 7                             |
| A-C    |         |               |                 |         | 228                     | 343                           |

### Main Results for each time segment

#### 16:45 - 17:00

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 11                    | 3                       | 558               | 0.020 | 11                  | 0.0               | 0.0             | 6.581     | A   |
| B-A    | 2                     | 0.56                    | 380               | 0.006 | 2                   | 0.0               | 0.0             | 9.540     | A   |
| C-AB   | 32                    | 8                       | 671               | 0.048 | 32                  | 0.0               | 0.1             | 5.634     | A   |
| C-A    | 165                   | 41                      |                   |       | 165                 |                   |                 |           |     |
| A-B    | 4                     | 1                       |                   |       | 4                   |                   |                 |           |     |
| A-C    | 187                   | 47                      |                   |       | 187                 |                   |                 |           |     |

#### 17:00 - 17:15

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 13                    | 3                       | 549               | 0.025 | 13                  | 0.0               | 0.0             | 6.720     | A   |
| B-A    | 3                     | 0.67                    | 365               | 0.007 | 3                   | 0.0               | 0.0             | 9.924     | A   |
| C-AB   | 41                    | 10                      | 686               | 0.060 | 41                  | 0.1               | 0.1             | 5.585     | A   |
| C-A    | 194                   | 49                      |                   |       | 194                 |                   |                 |           |     |
| A-B    | 4                     | 1                       |                   |       | 4                   |                   |                 |           |     |
| A-C    | 224                   | 56                      |                   |       | 224                 |                   |                 |           |     |

**17:15 - 17:30**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 17                    | 4                       | 536               | 0.031 | 16                  | 0.0               | 0.0             | 6.922     | A   |
| B-A    | 3                     | 0.83                    | 346               | 0.010 | 3                   | 0.0               | 0.0             | 10.507    | B   |
| C-AB   | 55                    | 14                      | 708               | 0.078 | 55                  | 0.1               | 0.1             | 5.519     | A   |
| C-A    | 233                   | 58                      |                   |       | 233                 |                   |                 |           |     |
| A-B    | 6                     | 1                       |                   |       | 6                   |                   |                 |           |     |
| A-C    | 274                   | 69                      |                   |       | 274                 |                   |                 |           |     |

**17:30 - 17:45**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 17                    | 4                       | 536               | 0.031 | 17                  | 0.0               | 0.0             | 6.922     | A   |
| B-A    | 3                     | 0.83                    | 346               | 0.010 | 3                   | 0.0               | 0.0             | 10.507    | B   |
| C-AB   | 55                    | 14                      | 708               | 0.078 | 55                  | 0.1               | 0.1             | 5.517     | A   |
| C-A    | 233                   | 58                      |                   |       | 233                 |                   |                 |           |     |
| A-B    | 6                     | 1                       |                   |       | 6                   |                   |                 |           |     |
| A-C    | 274                   | 69                      |                   |       | 274                 |                   |                 |           |     |

**17:45 - 18:00**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 13                    | 3                       | 549               | 0.025 | 14                  | 0.0               | 0.0             | 6.721     | A   |
| B-A    | 3                     | 0.67                    | 365               | 0.007 | 3                   | 0.0               | 0.0             | 9.927     | A   |
| C-AB   | 41                    | 10                      | 687               | 0.060 | 41                  | 0.1               | 0.1             | 5.574     | A   |
| C-A    | 194                   | 49                      |                   |       | 194                 |                   |                 |           |     |
| A-B    | 4                     | 1                       |                   |       | 4                   |                   |                 |           |     |
| A-C    | 224                   | 56                      |                   |       | 224                 |                   |                 |           |     |

**18:00 - 18:15**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 11                    | 3                       | 558               | 0.020 | 11                  | 0.0               | 0.0             | 6.585     | A   |
| B-A    | 2                     | 0.56                    | 380               | 0.006 | 2                   | 0.0               | 0.0             | 9.542     | A   |
| C-AB   | 33                    | 8                       | 671               | 0.049 | 33                  | 0.1               | 0.1             | 5.634     | A   |
| C-A    | 165                   | 41                      |                   |       | 165                 |                   |                 |           |     |
| A-B    | 4                     | 1                       |                   |       | 4                   |                   |                 |           |     |
| A-C    | 187                   | 47                      |                   |       | 187                 |                   |                 |           |     |

# 2036 + Dev, AM

## Data Errors and Warnings

| Severity | Area            | Item                                           | Description                                                                                                                 |
|----------|-----------------|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| Warning  | Minor arm flare | B - Site Access - Minor arm geometry           | Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed. |
| Warning  | Major arm width | C - Humber Doucy Lane (S) - Major arm geometry | For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.        |

## Results

### Results Summary for whole modelled period

| Stream | Max RFC | Max delay (s) | Max Queue (Veh) | Max LOS | Average Demand (Veh/hr) | Total Junction Arrivals (Veh) |
|--------|---------|---------------|-----------------|---------|-------------------------|-------------------------------|
| B-C    | 0.08    | 7.68          | 0.1             | A       | 35                      | 52                            |
| B-A    | 0.02    | 11.90         | 0.0             | B       | 6                       | 8                             |
| C-AB   | 0.04    | 4.84          | 0.1             | A       | 23                      | 34                            |
| C-A    |         |               |                 |         | 323                     | 485                           |
| A-B    |         |               |                 |         | 2                       | 3                             |
| A-C    |         |               |                 |         | 302                     | 453                           |

### Main Results for each time segment

#### 07:45 - 08:00

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 29                    | 7                       | 539               | 0.053 | 28                  | 0.0               | 0.1             | 7.042     | A   |
| B-A    | 5                     | 1                       | 352               | 0.013 | 4                   | 0.0               | 0.0             | 10.351    | B   |
| C-AB   | 16                    | 4                       | 761               | 0.022 | 16                  | 0.0               | 0.0             | 4.835     | A   |
| C-A    | 267                   | 67                      |                   |       | 267                 |                   |                 |           |     |
| A-B    | 2                     | 0.38                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 248                   | 62                      |                   |       | 248                 |                   |                 |           |     |

#### 08:00 - 08:15

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 34                    | 9                       | 527               | 0.065 | 34                  | 0.1               | 0.1             | 7.299     | A   |
| B-A    | 5                     | 1                       | 334               | 0.016 | 5                   | 0.0               | 0.0             | 10.948    | B   |
| C-AB   | 22                    | 5                       | 787               | 0.027 | 22                  | 0.0               | 0.0             | 4.703     | A   |
| C-A    | 317                   | 79                      |                   |       | 317                 |                   |                 |           |     |
| A-B    | 2                     | 0.45                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 296                   | 74                      |                   |       | 296                 |                   |                 |           |     |

**08:15 - 08:30**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 42                    | 10                      | 511               | 0.082 | 42                  | 0.1               | 0.1             | 7.678     | A   |
| B-A    | 7                     | 2                       | 309               | 0.021 | 7                   | 0.0               | 0.0             | 11.895    | B   |
| C-AB   | 30                    | 8                       | 824               | 0.036 | 30                  | 0.0               | 0.0             | 4.534     | A   |
| C-A    | 385                   | 96                      |                   |       | 385                 |                   |                 |           |     |
| A-B    | 2                     | 0.55                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 362                   | 91                      |                   |       | 362                 |                   |                 |           |     |

**08:30 - 08:45**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 42                    | 10                      | 511               | 0.082 | 42                  | 0.1               | 0.1             | 7.678     | A   |
| B-A    | 7                     | 2                       | 309               | 0.021 | 7                   | 0.0               | 0.0             | 11.895    | B   |
| C-AB   | 30                    | 8                       | 824               | 0.036 | 30                  | 0.0               | 0.1             | 4.536     | A   |
| C-A    | 385                   | 96                      |                   |       | 385                 |                   |                 |           |     |
| A-B    | 2                     | 0.55                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 362                   | 91                      |                   |       | 362                 |                   |                 |           |     |

**08:45 - 09:00**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 34                    | 9                       | 527               | 0.065 | 34                  | 0.1               | 0.1             | 7.302     | A   |
| B-A    | 5                     | 1                       | 334               | 0.016 | 5                   | 0.0               | 0.0             | 10.952    | B   |
| C-AB   | 22                    | 5                       | 787               | 0.027 | 22                  | 0.1               | 0.0             | 4.707     | A   |
| C-A    | 317                   | 79                      |                   |       | 317                 |                   |                 |           |     |
| A-B    | 2                     | 0.45                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 296                   | 74                      |                   |       | 296                 |                   |                 |           |     |

**09:00 - 09:15**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 29                    | 7                       | 539               | 0.053 | 29                  | 0.1               | 0.1             | 7.049     | A   |
| B-A    | 5                     | 1                       | 352               | 0.013 | 5                   | 0.0               | 0.0             | 10.356    | B   |
| C-AB   | 16                    | 4                       | 761               | 0.022 | 17                  | 0.0               | 0.0             | 4.837     | A   |
| C-A    | 267                   | 67                      |                   |       | 267                 |                   |                 |           |     |
| A-B    | 2                     | 0.38                    |                   |       | 2                   |                   |                 |           |     |
| A-C    | 248                   | 62                      |                   |       | 248                 |                   |                 |           |     |

# 2036 + Dev, PM

## Data Errors and Warnings

| Severity | Area            | Item                                           | Description                                                                                                                 |
|----------|-----------------|------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| Warning  | Minor arm flare | B - Site Access - Minor arm geometry           | Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed. |
| Warning  | Major arm width | C - Humber Doucy Lane (S) - Major arm geometry | For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.        |

## Results

### Results Summary for whole modelled period

| Stream | Max RFC | Max delay (s) | Max Queue (Veh) | Max LOS | Average Demand (Veh/hr) | Total Junction Arrivals (Veh) |
|--------|---------|---------------|-----------------|---------|-------------------------|-------------------------------|
| B-C    | 0.03    | 7.01          | 0.0             | A       | 14                      | 21                            |
| B-A    | 0.01    | 10.77         | 0.0             | B       | 3                       | 4                             |
| C-AB   | 0.08    | 5.59          | 0.1             | A       | 44                      | 67                            |
| C-A    |         |               |                 |         | 213                     | 319                           |
| A-B    |         |               |                 |         | 5                       | 7                             |
| A-C    |         |               |                 |         | 251                     | 376                           |

### Main Results for each time segment

#### 16:45 - 17:00

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 11                    | 3                       | 554               | 0.020 | 11                  | 0.0               | 0.0             | 6.635     | A   |
| B-A    | 2                     | 0.56                    | 374               | 0.006 | 2                   | 0.0               | 0.0             | 9.688     | A   |
| C-AB   | 33                    | 8                       | 677               | 0.049 | 33                  | 0.0               | 0.1             | 5.593     | A   |
| C-A    | 178                   | 44                      |                   |       | 178                 |                   |                 |           |     |
| A-B    | 4                     | 1                       |                   |       | 4                   |                   |                 |           |     |
| A-C    | 206                   | 51                      |                   |       | 206                 |                   |                 |           |     |

#### 17:00 - 17:15

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 13                    | 3                       | 544               | 0.025 | 13                  | 0.0               | 0.0             | 6.787     | A   |
| B-A    | 3                     | 0.67                    | 359               | 0.008 | 3                   | 0.0               | 0.0             | 10.116    | B   |
| C-AB   | 43                    | 11                      | 693               | 0.061 | 42                  | 0.1               | 0.1             | 5.538     | A   |
| C-A    | 209                   | 52                      |                   |       | 209                 |                   |                 |           |     |
| A-B    | 4                     | 1                       |                   |       | 4                   |                   |                 |           |     |
| A-C    | 245                   | 61                      |                   |       | 245                 |                   |                 |           |     |

**17:15 - 17:30**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 17                    | 4                       | 530               | 0.031 | 16                  | 0.0               | 0.0             | 7.009     | A   |
| B-A    | 3                     | 0.83                    | 337               | 0.010 | 3                   | 0.0               | 0.0             | 10.772    | B   |
| C-AB   | 57                    | 14                      | 717               | 0.080 | 57                  | 0.1               | 0.1             | 5.468     | A   |
| C-A    | 251                   | 63                      |                   |       | 251                 |                   |                 |           |     |
| A-B    | 6                     | 1                       |                   |       | 6                   |                   |                 |           |     |
| A-C    | 301                   | 75                      |                   |       | 301                 |                   |                 |           |     |

**17:30 - 17:45**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 17                    | 4                       | 530               | 0.031 | 17                  | 0.0               | 0.0             | 7.009     | A   |
| B-A    | 3                     | 0.83                    | 337               | 0.010 | 3                   | 0.0               | 0.0             | 10.773    | B   |
| C-AB   | 57                    | 14                      | 717               | 0.080 | 57                  | 0.1               | 0.1             | 5.463     | A   |
| C-A    | 251                   | 63                      |                   |       | 251                 |                   |                 |           |     |
| A-B    | 6                     | 1                       |                   |       | 6                   |                   |                 |           |     |
| A-C    | 301                   | 75                      |                   |       | 301                 |                   |                 |           |     |

**17:45 - 18:00**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 13                    | 3                       | 544               | 0.025 | 14                  | 0.0               | 0.0             | 6.788     | A   |
| B-A    | 3                     | 0.67                    | 358               | 0.008 | 3                   | 0.0               | 0.0             | 10.120    | B   |
| C-AB   | 43                    | 11                      | 693               | 0.061 | 43                  | 0.1               | 0.1             | 5.530     | A   |
| C-A    | 209                   | 52                      |                   |       | 209                 |                   |                 |           |     |
| A-B    | 4                     | 1                       |                   |       | 4                   |                   |                 |           |     |
| A-C    | 245                   | 61                      |                   |       | 245                 |                   |                 |           |     |

**18:00 - 18:15**

| Stream | Total Demand (Veh/hr) | Junction Arrivals (Veh) | Capacity (Veh/hr) | RFC   | Throughput (Veh/hr) | Start queue (Veh) | End queue (Veh) | Delay (s) | LOS |
|--------|-----------------------|-------------------------|-------------------|-------|---------------------|-------------------|-----------------|-----------|-----|
| B-C    | 11                    | 3                       | 554               | 0.020 | 11                  | 0.0               | 0.0             | 6.638     | A   |
| B-A    | 2                     | 0.56                    | 374               | 0.006 | 2                   | 0.0               | 0.0             | 9.692     | A   |
| C-AB   | 33                    | 8                       | 677               | 0.049 | 33                  | 0.1               | 0.1             | 5.591     | A   |
| C-A    | 177                   | 44                      |                   |       | 177                 |                   |                 |           |     |
| A-B    | 4                     | 1                       |                   |       | 4                   |                   |                 |           |     |
| A-C    | 206                   | 51                      |                   |       | 206                 |                   |                 |           |     |



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## **Appendix F**

## Sustainability Appraisal Concerns

- 1.1 The preparation of a Sustainability Appraisal to inform the Local Plan is a legal requirement, as per the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations').
- 1.2 Furthermore, the NPPF makes clear (paragraph 32) that Local Plans should be informed by a Sustainability Appraisal that meets the relevant legal requirements; and that this should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains).
- 1.3 Requirements of the SEA Regulations include the need to explain why options have been selected, and alternatives rejected; and to appraise options to the same level of detail.
- 1.4 The emerging Ipswich Local Plan is accompanied by a Sustainability Appraisal ('the SA/SEA').
- 1.5 The SA acknowledges (Section 3, paragraph xxxvi) that the Spatial Strategy proposed in the Local Plan is a combination of several of the Spatial Options, but mostly aligns with Spatial Option 1.
- 1.6 Firstly, whilst it could be said that the spatial strategy the emerging Local Plan proposes resembles Spatial Option 1 more than the other options appraised, it is not Spatial Option 1. As such, the SA does not appear to have assessed the spatial strategy within the emerging Local Plan in a manner that enables comparison to reasonable alternatives.
- 1.7 Further to this, it is problematic that the commentary in Table 2 of the SA (which seeks to explain the reason for the selection of options and the rejection of alternatives – a requirement of the SEA Regulations) refers to Spatial Option 1 as having been the option selected. This of course contradicts earlier commentary within the SA, which confirms the selected option merely most closely resembles Option 1 relative to other options appraised.

- 1.8 Turning to the appraisal of the Spatial Options against the SA objectives, we have a number of concerns and comments in relation to how Spatial Option 1 and Spatial Option 2 (increased development beyond the Borough boundary) are assessed, as set out below.

**SA Objective 2 (to meet the housing requirements of the whole community)**

- 1.9 In respect of Spatial Option 1 (Higher-density urban regeneration), the SA/SEA suggests that this will have a minor positive impact on SA objective 2. It merits emphasising that this SA objective refers to meeting the housing requirements of the whole community. However, nowhere within the appraisal of this option does it appear to have considered the differing housing needs of the community, and the implications for these of pursuing this option. Instead, it appears to have simply focused on the quantum of development, without considering the type. Even prior to considering this issue, the appraisal identifies concerns in relation to this option, noting that it is unlikely to meet needs on its own. We consider that such an option in focussing on higher-density urban regeneration is unlikely to meet the housing needs of all, and would result in a narrow range of types of homes being delivered, skewed heavily towards smaller, flatted accommodation. This may disadvantage those requiring larger, family homes; as well as those in need of specialist accommodation. The SA should recognise this, and the scoring adjusted accordingly.
- 1.10 In respect of Spatial Option 2, we agree that increased development beyond the Borough boundary would have a major positive effect in relation to SA objective 2. In addition, and to assist a decision-maker in comparing this with alternative options, it should be recognised that through this approach there are far greater prospects that a variety of forms of housing and accommodation will be provided which meet the needs of all of the community, including through provision of affordable housing and specialist accommodation.

**SA Objective 5 (to improve levels of education and skills in the population overall)**

- 1.11 In respect of Spatial Option 1 and SA objective 5, the appraisal notes that future residents in these locations would likely have good access to education services. It

should be recognised that all school-aged people in the Borough should have access to education, regardless of proximity to educational facilities. Ability to access educational facilities without reliance on a private car is of relevance to the SA/SEA (SA objective 18), but not SA objective 5.

- 1.12 The assessment of Spatial Option 1 against SA objective 5 goes on to suggest the option may result in capacity concerns in some locations. However, despite identifying what would appear to be a significant issue in relation to this SA objective, Spatial Option 1 is still given a score of minor positive in relation to this.
- 1.13 In respect of Spatial Option 2, the appraisal recognises that this approach is likely to engender fewer capacity concerns. However, it also states that access to education services in these locations may well be more limited. We consider that access is highly unlikely to be so difficult as to constitute a negative impact in relation to this particular SA objective. Again, it is more relevant to SA objective 18. As Spatial Option 2 is assessed as having a minor negative impact in relation to promoting sustainable travel, the scoring of this SA objective as a minor negative for the same reasons is, in effect, double-counting this one issue.

#### **SA Objective 11 (to reduce vulnerability to climatic events and flooding)**

- 1.14 The SA/SEA assesses Spatial Option 2 as having a minor negative impact on this SA objective, explaining that fluvial flood risk is present in and around Ipswich. It makes reference to there being areas of fluvial flood risk to the north of Ipswich.
- 1.15 In actual fact, the Environment Agency flood mapping shows that the greatest areas of Flood Zone 2/3 are located within Ipswich itself (and as such, relevant to Spatial Option 1); and to the south of Ipswich. Areas of Flood Zone 2/3 to the north are very limited. The vast majority of land to the north of Ipswich is Flood Zone 1 – land least at risk of flooding from tidal or fluvial sources. Certainly, a significant quantum of development could be accommodated to the north or east of Ipswich without having to develop land in Flood Zone 2/3. The SA/SEA's conclusion on Spatial Option 2's impact on SA objective 11 is, in our view, reliant on entirely specious reasoning.

**SA objective 12 (safeguard the integrity of the coast and estuaries)**

- 1.16 In relation to SA objective 12 (safeguard the integrity of the coast and estuaries), the appraisal scored Option 1 as a minor positive, and justifies this by stating:

*"Option 1 would situate nearly all new development within urban locations and it is therefore unlikely that it would adversely affect the coast or estuaries. However, it would also not provide an opportunity to enhance the setting or character of the coast and estuaries".*

- 1.17 This appraisal completely overlooks that large sections of the Suffolk coast comprise Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites which are vulnerable to recreational disturbance. Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils ('the Suffolk RAMS') confirms that the entirety of Ipswich Borough is within the Zone of Influence of European sites, i.e. it can be expected that, without mitigation measures, residents of Ipswich Borough will visit these European sites.
- 1.18 Whilst it is recognised that higher density development located within existing urban areas may be able to make financial contributions towards mitigation, their ability to incorporate Suitable Alternative Natural Greenspaces (SANGs) will of course be extremely limited.
- 1.19 In respect of Spatial Option 2 and SA objective 12, the appraisal states:

*"Situating development in the rural areas could make it difficult to avoid adverse impacts on the coast and estuaries in all cases, including the biodiversity value, sensitive landscapes and heritage value prevalent here. This would be particularly the case if a new settlement were delivered."*

- 1.20 It concludes that there would be a minor negative impact.
- 1.21 We consider the SA's appraisal of Spatial Option 2 in relation to this SA objective to be wholly misconceived.

- 1.22 As noted above, the entirety of Ipswich Borough is within the Zone of Influence of the coastal SPAs, SACs and Ramsar sites. As such, development beyond the Borough boundary would be no more within the Zone of Influence than development within it. Development beyond the boundary is highly unlikely to have a direct impact (as in, encroach into any of the protected areas) on any of the estuaries or coasts, as, with the exception of the Stour and Orwell Estuaries SPA/Ramsar site, none of the estuaries or coastal areas are within such proximity to the Borough such that increased development beyond the Borough boundary would feasibly encroach into such areas. In any case, the Stour and Orwell Estuaries only has potential to be directly impacted by development to the south of the Borough.
- 1.23 The option of increased development beyond the Borough boundary has potential to incorporate SANGS and to reduce recreational disturbance of the European sites, not simply from future residents of the development, but also from existing residents within the locality. Spatial Option 2 should be seen as having a positive impact on this SA objective when compared to alternatives.

**SA objective 13 (to conserve and enhance biodiversity and geodiversity)**

- 1.24 Turning to SA objective 13 the appraisal in relation to this appears to be based on the misconception that greenfield land is inherently of ecological value. This is not the case. Indeed, intensively farmed agricultural land is generally of negligible ecological value, and such the ecological value of land can often be enhanced through its development.
- 1.25 In relation to Spatial Option 1, despite the appraisal text noting that it may be difficult to incorporate high quality green infrastructure into high-density, urban development, it fails to reflect this in the scoring of this option.
- 1.26 Furthermore, the text on Spatial Option 1 makes reference to landscape designations. This is an entirely different matter to biodiversity, one unrelated to this SA objective.
- 1.27 In respect of Spatial Option 2, in addition to the aforementioned flawed assumption that greenfield land is of ecological value, we note that the text notes the potential positive effects of this approach with low density development giving rise to opportunities for

ecological enhancements. However, the scoring (minor negative) does not reflect this positive effect.

**SA objective 14 (to conserve and where appropriate enhance areas and assets of historical and archaeological importance)**

- 1.28 In relation Spatial Option 1 and this SA objective, the appraisal text identifies the potential negative effects, stating as follows:

*“Should taller buildings be required to meet the higher density requirements, there is greater potential for development to have an adverse impact on long-distance views and to discord with the local character. A large quantity of cultural heritage assets, including Listed Buildings, Scheduled Monuments and Conservation Areas, are situated within the urban areas of Ipswich, the setting of which could be adversely impacted by any nearby high-density developments or tall buildings”.*

- 1.29 Notwithstanding this wholly negative assessment provided by the SA/SEA in relation to SA objective 14, the option is inexplicably scored as a positive / negative impact, rather than minor negative or major negative.
- 1.30 Spatial Option 2 is assessed as having a positive / negative effect on SA objective 14. However, from the commentary, it is clear that the negative impact relates to perceived concerns regarding harm to the character of rural locations.
- 1.31 Firstly, this is not an issue that is relevant to SA objective 14. This is more a matter for SA objective 15.
- 1.32 Secondly, and in any case, we do not agree with the statement that “where development takes place in rural locations it is more likely to discord with the local character and adverse impacts may be more likely”. On the contrary, it should be recognised that planning policies can, and more often than not do, insist that development responds positively to local character and context, including in rural areas. Development need not have an intrinsically harmful impact on the character of small settlements, as the SA/SEA appears to imply here.

**SA Objective 15 (to conserve and enhance the quality and local distinctiveness of landscapes and townscape)**

- 1.33 In relation to this SA objective and Spatial Option 1, the appraisal states that:

*"With most development taking place in urban areas, it is uncertain the extent to which high density development might discord with the local townscape character".*

- 1.34 We consider that a strategy wholly reliant on higher density development will, necessarily, result in negative impacts on the townscape. It should be recognised that Ipswich is not currently characterised by high density development, and such an approach would be very much at odds with the existing character of much of the Borough.
- 1.35 As such, we consider the assessment of Spatial Option 1 against SA objective 15 as a minor positive is unjustified.
- 1.36 In relation to Spatial Option 2, this is assessed as having a major negative impact on this SA objective. However, from the text it appears that the SA/SEA has failed to acknowledge that harm to the landscape can be mitigated and that there are likely to be a number of opportunities to provide development in locations which are not sensitive in landscape terms.
- 1.37 Furthermore, the appraisal of Spatial Option 2 in relation to this SA objective appears to have entirely overlooked the issue of townscape, instead focussing solely on landscape. It should be recognised that Spatial Option 2 will have a positive impact on landscape, by virtue of avoiding having to rely on increasing densities within the existing settlement.

**SA Objective 16 (to achieve sustainable levels of prosperity and growth throughout the plan area)**

- 1.38 In relation to SA objective 16, the appraisal of Spatial Option 1 identifies the potential harm of this approach to nearby market towns, but the scoring against this objective (major positive) does not reflect this concern.

## Conclusion

- 1.39 As noted earlier, the Sustainability Appraisal is an important component of the Local Plan, and plays a key role in justifying the approach taken, as well as the options rejected.
- 1.40 The SA which accompanies the emerging Local Plan at this stage gives rise to a number of concerns, particularly in relation to how the selected option has been assessed (if at all), and the robustness of the assessment which resulted in it being selected and alternatives rejected.
- 1.41 In particular, the issues identified above in relation to numerous SA objectives have resulted in the Spatial Option 1 being assessed as being far more positive than should be the case.
- 1.42 Conversely, there are numerous instances where a flawed approach to assessment of Spatial Option 2 has resulted in it being assessed as unduly negative.
- 1.43 A such, the SA prepared alongside the emerging Local Plan (Regulation 19) does not provide the necessary justification of the strategy proposed by the emerging Local Plan.
- 1.44 Once the appraisal is updated to address the above, the Council should review whether the strategy it proposes is suitable; and whether the reason for rejecting alternatives is still applicable.

**Felicia Blake**

---

**From:** Catherine Abbott  
**Sent:** 18 February 2020 07:30  
**To:** Felicia Blake  
**Subject:** FW: CC175705244: Comment Received  
**Attachments:** CC175705244 - Comment.pdf

Fel

This one relates to the local plan

Thanks

Kind Regards

Catherine Abbott  
Senior Administration Officer  
Planning & Development  
Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1 2DE

---

**From:** Ipswich Borough Council <noreply@ipswich.gov.uk>

**Sent:** 17 February 2020 20:37

**To:**

**Subject:** CC175705244: Comment Received

# MY IPSWICH

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Ref No: CC175705244

---

Dear Colleague,

A customer has submitted an online 'Comment' form for your service area. Please find the details of the 'Comment' listed below and also on the attached PDF which can be saved for your service records.

---

Service area: Planning & Development

**Comment:** I object to the proposed site allocation ip061 for housing.

The green field is an important wildlife stepping stone and is used by the local residents for leisure which is a benefit to fitness, social interaction and mental well being. Lavenham road and kelly road can not support the extra traffic this housing development would create if it went ahead. Already Kelly road and lavenham road are single roads due

to the sheer number of parked cars along it. Recently a heavily pregnant mum-to-be had to call out an ambulance which could not make its way to destination house due to parked cars blocking access. Amongst other wildlife present on the green (as highlighted in the suffolk wildlife trust report 2019) here are additional bats nesting in and around properties 201 to 215 and crane hall, these locations have not been picked up by the report, however, I will be approaching the national bat association to make sure they know of these locations.

---

#### **Customer Details**

**Email Address:** \_\_\_\_\_

---

#### **What you need to do next?**

- If you would like to add an internal note to the comment, i.e. if you have taken any action then please click [here](#).
  - Once you have added a note you will then receive an updated PDF including the notes you have added.
- 

**Kind Regards**

**Customer Services**

---

**\*\*\* THIS IS AN AUTOMATED EMAIL: This email address is unable to take replies \*\*\***

**Date and time of enquiry: 17/02/2020 20:36:35**

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**C**



**Felicia Blake**

---

**From:** Nick Davey  
**Sent:** 02 March 2020 17:18  
**To:** PlanningPolicy  
**Subject:** Public Consultation for the Ipswich Local Plan Review Final Draft 15th January 2020 – 2nd March 2020  
**Attachments:** Local Plan Final Draft Comments Form.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir / Madam

We are pleased to attach comments, made on behalf of Cardinal Lofts (Mill) Ltd, in respect of the Ipswich Local Plan Review Final Draft.

We would be grateful for confirmation of receipt.

Regards

Nick Davey

W: [www.jtspartnership.co.uk](http://www.jtspartnership.co.uk)

THE JTS PARTNERSHIP LLP  
Number One, The Drive  
Brentwood, CM13 3DJ

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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



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[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                            |
|----------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> | <b>Ipswich Final Draft Local Plan</b>                                                                                                                                                                                                      |
| <b>Please return this comments form to:</b>                          | <u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or<br><br>Planning Policy Team<br>Planning and Development<br>Ipswich Borough Council<br>Grafton House<br>15-17 Russell Road<br>Ipswich<br>IP1 2DE |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                            |
| <b>This form has two parts:</b>                                      | <b>Part A – Personal details</b><br><br><b>Part B – Your comment(s).</b>                                                                                                                                                                   |

#### **PART A PERSONAL DETAILS**

|                                               | <b>1. Personal details</b>       | <b>2. Agent's details (if applicable)</b>                            |
|-----------------------------------------------|----------------------------------|----------------------------------------------------------------------|
| <b>Title</b>                                  |                                  |                                                                      |
| <b>First name</b>                             |                                  |                                                                      |
| <b>Last name</b>                              |                                  |                                                                      |
| <b>Job title (where relevant)</b>             |                                  |                                                                      |
| <b>Organisation (where relevant)</b>          | <b>Cardinal Lofts (Mill) Ltd</b> | <b>The JTS Partnership LLP</b>                                       |
| <b>Address<br/>(Please include post code)</b> |                                  | <b>Number One<br/>The Drive<br/>Brentwood<br/>Essex<br/>CM13 3DJ</b> |
| <b>E-mail</b>                                 |                                  |                                                                      |
| <b>Telephone No.</b>                          |                                  |                                                                      |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                                                                |
|----------------------------------------------------------------------|----------------------------------------------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | The JTS Partnership LLP on behalf of Cardinal Lofts (Mill) Ltd |
|----------------------------------------------------------------------|----------------------------------------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part.                                                                                                                                                                                                            | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Core Strategy and Policies<br/>Development Plan<br/>Document Review<br/>Final Draft &amp; Site Allocations and Policies<br/>(Incorporating IP-One Area Action Plan) Development Plan Document<br/>Review Final Draft – Background.</b> | <p><b>Background</b></p> <p>Cardinal Lofts (Mill) Ltd owns the freehold, or has a major interest in, a number of sites (IP035: St Peter Port – IP206: Cranfields – IP211: Regatta Quay), which are all located in the Northern Quays area of the Waterfront. The Company has been talking to planning officers about potential future developments for some time and, in October 2018, it presented its emerging proposals for the St Peter Port site to the Council's Conservation and Design Panel.</p> <p>The successful development of the Company's site is key to delivering both a number of the Council's objectives for the Waterfront area (including the aim of improving north-south links between the Waterfront and the Town Centre) and the overall strategy of concentrating new development in the IP-One Area. The Company is, however, concerned that the emerging policies do not take into account the significant 'abnormal' costs of developing these sites (and, in particular, IP035) and will, therefore, render development financially unviable and, ultimately, non-deliverable. As such, the Final Draft is unsound.</p> <p>In March 2019, the Company made representations, in respect of both the preferred options draft Core Strategy and Site Allocations and Policies documents, seeking a greater degree of flexibility into those policies that will be directly material to any future application(s) that are brought forward for these sites. In addition to seeking recognition, within the emerging plans, that development needs to be profitable, in order to be undertaken, the Company specifically requested that the Borough Council:-</p> <ul style="list-style-type: none"> <li>• amend those policies relating to Site IP035 that restrict the height and density of development that may be achieved; and,</li> <li>• introduce a specific recognition that, in order to further the</li> </ul> |

| <b>Document(s) and document part.</b>                                                                                                             | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                   | <p>development of all three sites, some parking provision should be made for new residents, which can only be located on-site IP035.</p> <p>Whilst the Council has accepted some of the suggestions, the Company is still concerned that the operation of the new Plan will potential frustrate the development of these sites. Accordingly, it is of the review the Final Draft is not sound.</p>                                                                                                                                                            |
| <b>Core Strategy and Policies<br/>Development Plan Document Review Final Draft – Chapter 6: Vision and Objectives – Paragraphs 6.7 &amp; 6.8.</b> | <p><b>Vision &amp; Objectives</b></p> <p>The Company continues to support the general Vision as is set out at paragraph 6.7. It is also in general agreement with the Objectives (paragraph 6.8), but considers that there should be explicit recognition that, unless development is viable (or is subsidised from the public purse) it will not take place and the Vision will not, therefore, be achieved (and is unsound).</p> <p>Summary: Object for the reasons set out above. The inclusion of the word 'viable' needs to be added to Objective 4.</p> |
| <b>Core Strategy and Policies<br/>Development Plan Document Review Final Draft – Chapter 6: The Spatial Strategy – Paragraphs 6.10 to 6.22.</b>   | <p><b>The Spatial Strategy</b></p> <p>The Company offers its general support for the spatial strategy, as set out at paragraphs 6.10 to 6.22, and, in particular, the objective of focussing development in central Ipswich in order to tackle issues of deprivation and social exclusion (see also paragraph 6.8 - Objective 3).</p> <p>Summary: Support.</p>                                                                                                                                                                                                |
| <b>Core Strategy and Policies<br/>Development Plan Document Review Final Draft – Chapter 8: Policy CS2 and paras 8.53 to 8.67.</b>                | <p><b>The Location and Nature of Development</b></p> <p>Policy CS2 gives expression to the Council's spatial strategy and its main principles are supported by the Company. In particular, the Company again notes the focus that is being placed upon the IP-One Area, where high-density development will be the norm.</p> <p>The Company notes, and welcomes, the changes made to criterion h of the policy, which is now consistent with the guidance set out in the NPPF.</p> <p>Summary: Support</p>                                                    |

| <b>Document(s) and document part.</b>                                                                                            | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Core Strategy and Policies Development Plan Document Review Final Draft – Policy CS3</b>                                      | <p><b>IP-One Area Action Plan</b></p> <p>The Company welcomes the change made to criterion c and the explicit recognition that guidance set out in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft may not always be the optimum way to develop a site.</p> <p><b>Summary: Support</b></p>                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS5 and paras 8.92 to 8.98.</b>   | <p><b>Improving Accessibility</b></p> <p>The Company generally welcomes, and supports, initiatives that are designed to minimise the need to travel and promote foot, bicycle and public transport travel modes.</p> <p>The Company also welcomes the recognition that some journeys will need to be made by car, however, it is disappointed that only the Town Centre is specifically mentioned as being a location, the vitality and viable of which, depends upon access by a variety of transport modes. The Company is of the view that, in order for the Final Draft to be found sound, this 'recognition' needs to be expanded to include the whole of the IP-One Area.</p> <p><b>Summary: Object for the reasons set out above.</b></p> |
| <b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS8 and paras 8.113 to 8.125</b>  | <p><b>Housing Type and Tenure</b></p> <p>The Company welcomes the acknowledgement that, in some cases, such as due to the high cost of development and 'abnormals' relating to a site, it may not always be viable to provide a full mix of dwelling types and sizes.</p> <p><b>Summary: General support.</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS12 and paras 8.150 to 8.163</b> | <p><b>Affordable Housing</b></p> <p>The Company welcomes the acknowledgement that, in some cases, such as due to the high cost of development and 'abnormals' relating to a site, it may not always be viable to provide full affordable housing provision.</p> <p>It is understood that the Council will shortly be progressing with its proposed Community Infrastructure Levy. This will place additional financial burdens upon development and, in some circumstances, reduce the amount of affordable housing that can be provided (on viability</p>                                                                                                                                                                                       |

| <b>Document(s) and document part.</b>                                                                                                 | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                       | <p>grounds).</p> <p><b>Summary:</b> General support.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Core Strategy and Policies<br/>Development Plan Document Review Final Draft – Chapter 8: Policy CS16 and paras 8.199 to 8.209.</b> | <p><b>Green Infrastructure, Sport and Recreation</b></p> <p>Whilst the Company generally supports the objectives of this policy, it considers that, in order for the Final Draft to be found sound, there should be an explicit recognition that, on high density sites within the IP-One Area, and particularly along the Waterfront, it will not be possible to make full provision for private, and public, open space, in accordance with the Council's standards. Open space is a very 'land hungry' use and, if developments have to meet full standards, densities will be greatly reduced. This could threaten the achievement of the Council's spatial strategy and result in new development not making the best, and most effective, use of previously developed sites.</p> <p><b>Summary:</b> Object for the reasons set out above.</p> |
| <b>Core Strategy and Policies<br/>Development Plan Document Review Final Draft – Chapter 9: Policy DM6 and paras 9.6.1 to 9.6.9.</b>  | <p><b>Provision of New Open Spaces, Sport and Recreation Facilities</b></p> <p>The Company's comments, in respect of this policy, follow on from those set out above in relation to Policy CS16. The Company again offers its general support to the objectives of the policy, but considers that, in order to be found sound, it needs to be more explicit in recognising that, on higher density, previously developed sites in the IP-One Area, and particularly on the Waterfront, it will not be possible to make full provision for open space in accordance with the Council's standards.</p> <p><b>Summary:</b> Object for the reasons set out above.</p>                                                                                                                                                                                   |
| <b>Core Strategy and Policies<br/>Development Plan Document Review Final Draft – Chapter 9: Policy DM7 and paras 9.7.1 to 9.7.11</b>  | <p><b>Provision of Private Outdoor Amenity Space in New and Existing Developments</b></p> <p>As with the comments relating to Policies CS16 and DM6, there should be explicit recognition that, in respect of high density, previously developed sites, it may not always be possible to make full provision for private amenity space to accord with the Council's standards.</p> <p><b>Summary:</b> Object for the reasons set out above.</p>                                                                                                                                                                                                                                                                                                                                                                                                     |

|                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>Document(s) and document part.</b>                                                                                                                                              | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Core Strategy and Policies<br/>Development Plan<br/>Document Review<br/>Final Draft – Chapter 9: Policy DM13 and paras 9.13.1 to 9.13.26</b>                                    | <b>Built Heritage &amp; Conservation</b><br><br>The Company supports the general objectives set out in this policy and is satisfied with the revised wording of the policy, which better accords with the guidance set out in the NPPF.<br><br>Summary: General support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Core Strategy and Policies<br/>Development Plan<br/>Document Review<br/>Final Draft – Chapter 9: Policy DM15 and paras 9.15.1 to 9.15.7 and IP-One Area Inset Policies Map.</b> | <b>Tall Buildings</b><br><br>Whilst the Company generally supports the policy, it objects to the exclusion of Site IP035 from the 'arc of land', where tall buildings may be appropriate, as shown on the IP-One Area Inset Proposals Map.<br><br>The costs of developing Site IP035 are such that a high density development, potentially involving one, or more, 'tall buildings' will be required. The Council has granted planning permission (ref: 07/00555/FUL) to redevelop the site for mixed use purposes, with buildings ranging from 7 to 11 storeys in height and, since then, 'tall buildings' have been developed on a number of adjacent sites.<br><br>The policy, as currently worded, will potentially frustrate the development of this key Waterfront site and is, therefore, unsound. Impacts upon the setting of adjacent listed buildings, and other heritage assets, can be adequately addressed under Policy DM13.<br><br>Summary: Objection. |
| <b>Core Strategy and Policies<br/>Development Plan<br/>Document Review<br/>Final Draft – Chapter 9: Policy DM22 and paras 9.22.1 to 9.22.8</b>                                     | <b>Car and Cycle Parking in New Development</b><br><br>The Company welcomes the recognition (para 9.21.6) that many people still own cars and that adequate levels of residential parking, that uses land efficiently and is well designed, needs to be provided as part of new residential schemes.<br><br>Summary: Support.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Core Strategy and Policies<br/>Development Plan</b>                                                                                                                             | <b>The Density of Residential Development</b><br><br>The Company welcomes the policy support for high densities of residential                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

| <b>Document(s) and document part.</b>                                                                                                           | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <b>Document Review Final Draft – Chapter 9: Policy DM23 and paras 9.23.1 to 9.23.6</b>                                                          | <p>development in the Portman Quarter and Waterfront areas.</p> <p><b>Summary: Support.</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 4: Policy SP2</b> | <p><b>Land Allocated for Housing</b></p> <p>The Company welcomes the identification of Site IP035 for development as a residential-led mixed-use scheme. It is, however, of the view that the site has a much greater capacity than is indicated in the policy – in fact, a much greater density, than that implied by the capacity figure, is required in order to make any form of development viable.</p> <p>As is acknowledged in the related Site Sheet (the status of which is not clear), Site IP035 is subject to a number of abnormal development costs, not the least being archaeology. A lot of information was collated, about the archaeological potential of the site, in connection with the submission, and grant of planning permission, under reference 07/00555/FUL. The site is known to be of high archaeological potential and the cost of full archaeological excavation and recording was costed at £1.3 million (plus or minus 50%) and was estimated to take 12 months (plus or minus 50%), in 2008. Given the uncertainty surrounding both the cost, and timescale for, archaeological excavation, and the financial crash of 2008/2009, it proved impossible to raise the necessary finance to fund the development.</p> <p>The site is also subject to a number of other abnormalities, which include the following.</p> <ul style="list-style-type: none"> <li>• <b>Hydrology:</b> There are a number of water channels running under the site (it lies on the route of the former Lower Brook Street) and there are concerns that archaeological excavation could change the hydrology of the site and thus impact upon the structural integrity of the two listed adjacent churches. Accordingly, there is a requirement for the condition of the churches to be monitored, throughout the excavation process, with a £250k cash bond (in 2008) being required in order to insure against any damage.</li> <li>• <b>Numbers 1-5 College Street:</b> The listed buildings that lie within the site are in a very poor state of repair and £500k has recently had to be spent on them to make them wind and watertight. They cannot be insured (as they are currently empty) and the cost of the works</li> </ul> |

| Document(s) and document part.                 | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                |  |  |  |                     |           |                    |  |  |                    |            |  |                          |          |            |
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|                                                | <p>already carried out has to be recovered from any future development.</p> <ul style="list-style-type: none"> <li>• <b>Land Contamination:</b> There is a 'backfilled' pit on the site and the cost of remediation works have been put at over £100k.</li> <li>• <b>Sustainable Urban Drainage:</b> The site lies within Flood Zone 2/3, with the water table being very close to the surface. Accordingly, SUDS measures have to be above ground, which adds in the order of £500k, over and above the cost of installing a 'traditional' SUDS scheme, to development costs.</li> <li>• <b>Air Quality:</b> The site is surrounded by the heavily trafficked Star Lane gyratory system and the additional costs of air quality mitigation measures are put at £500k.</li> <li>• <b>Design:</b> the site lies between two listed churches and adjacent to the Wet Dock Conservation Area. As a result, a high standard of design will be required, which it is anticipated will add up to 20% to normal build costs.</li> </ul> <p>The following table summarises the abnormal costs (i.e. those over and above developing the 'average' brownfield' site) and compares the option of dealing with archaeological issues via excavation and recording (which cannot be financed due to the uncertainties involved) or via the construction of an above ground raft, upon which the development will sit (so preserving the archaeology in-situ).</p> <p>Whichever route is chosen, the costs of developing this site are very high and, in order to be justified, a much higher number of dwellings, and a greater density, than is indicated in Policy SP2 needs to be provided.</p> <table border="1" data-bbox="472 1588 1409 2045"> <thead> <tr> <th colspan="3" data-bbox="472 1588 1409 1729">ST PETER PORT<br/>ABNORMAL* COST OF DEVELOPMENT</th> </tr> <tr> <th data-bbox="472 1729 937 1834"></th> <th data-bbox="937 1729 1234 1834">Excavate and Record</th> <th data-bbox="1234 1729 1409 1834">Raft Slab</th> </tr> </thead> <tbody> <tr> <td data-bbox="472 1834 937 1902"><b>ARCHAEOLOGY</b></td> <td data-bbox="937 1834 1234 1902"></td> <td data-bbox="1234 1834 1409 1902"></td> </tr> <tr> <td data-bbox="472 1902 937 1969"><b>Excavations</b></td> <td data-bbox="937 1902 1234 1969">£2,500,000</td> <td data-bbox="1234 1902 1409 1969"></td> </tr> <tr> <td data-bbox="472 1969 937 2045"><b>Construction Cost</b></td> <td data-bbox="937 1969 1234 2045">£500,000</td> <td data-bbox="1234 1969 1409 2045">£2,000,000</td> </tr> </tbody> </table> | ST PETER PORT<br>ABNORMAL* COST OF DEVELOPMENT |  |  |  | Excavate and Record | Raft Slab | <b>ARCHAEOLOGY</b> |  |  | <b>Excavations</b> | £2,500,000 |  | <b>Construction Cost</b> | £500,000 | £2,000,000 |
| ST PETER PORT<br>ABNORMAL* COST OF DEVELOPMENT |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                |  |  |  |                     |           |                    |  |  |                    |            |  |                          |          |            |
|                                                | Excavate and Record                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Raft Slab                                      |  |  |  |                     |           |                    |  |  |                    |            |  |                          |          |            |
| <b>ARCHAEOLOGY</b>                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                |  |  |  |                     |           |                    |  |  |                    |            |  |                          |          |            |
| <b>Excavations</b>                             | £2,500,000                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                |  |  |  |                     |           |                    |  |  |                    |            |  |                          |          |            |
| <b>Construction Cost</b>                       | £500,000                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | £2,000,000                                     |  |  |  |                     |           |                    |  |  |                    |            |  |                          |          |            |

| <b>Document(s) and document part.</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |                                                     |                   |
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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Risk Insurance for Adjacent Buildings</b>                                                                        | <b>£250,000</b>                                     |                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Additional Interest / Management arising from 12 month excavation period</b>                                     | <b>£500,000</b>                                     |                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>TOTAL ADDITIONAL COST DUE TO ARCHAEOLOGICAL ISSUES</b>                                                           | <b>£3,750,000</b>                                   | <b>£2,000,000</b> |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                     |                                                     |                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>1-5 COLLEGE STREET (cost of making wind &amp; watertight)</b>                                                    | <b>£500,000</b>                                     |                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>LAND CONTAMINATION</b>                                                                                           | <b>£100,000</b>                                     |                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>SUSTAINABLE URBAN DRAINAGE</b>                                                                                   | <b>£500,000</b>                                     |                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>AIR QUALITY</b>                                                                                                  | <b>£500,000</b>                                     |                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>DESIGN</b>                                                                                                       | <b>Increase cost of constructing facades by 20%</b> |                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                                                                                                                     |                                                     |                   |
| <p><b>*Abnormal – costs over, and above, cost of developing ‘average’, brownfield, urban site.</b></p> <p>The Company also considers that there needs to be explicit reference to any future development of the site having to incorporate an element of car parking, for both the residential units to be accommodated thereon and for the further residential units to be developed on Sites IP206 and IP211.</p> <p>Development needs to incorporate some parking for the new residential units (at an indicative ratio of 2:1), together with parking (at a similar ratio) for those parts of Sites IP206 and IP211, which have not yet been built out.</p> <p>Sites IP206 and IP211 fell into the hands of the Receiver, before they were completed, due to the recession of 2008/2009. Unfortunately, and in order to generate some income/funds, the Receiver has sold off all the available parking, on both sites, with those parts of the development which have been completed. As such, there is no existing parking, and no</p> |                                                                                                                     |                                                     |                   |

|                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| <b>Document(s) and document part.</b>                                                                                                                      | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|                                                                                                                                                            | <p>opportunity to provide further parking, for those parts of these developments that have not yet been completed. If the remaining parts of these developments are to be brought forward, in accordance with Policy SP3, some parking has to be provided on an adjacent, accessible, site.</p> <p>This is particularly important with respect to Site IP206. The Borough Council will be familiar with the issues that have beset the 20-storey tower block building which, despite being completed to 'shell' for nearly a decade, has never been occupied. Before that development can be completed, all of the cladding needs to be removed and replaced, and structural issues need to be rectified, at significant cost. Site IP206 also includes the Victorian Albion Wharf building, which the Company is committed to rebuilding, whilst retaining the important dock facing elevation (again at significant cost). Both investments can only be justified if there is some parking provision made for the new residents.</p> <p><b>Summary:</b> Support the identification of Site IP035, but object to the indicative capacity and lack of express reference to the need to provide parking for both the development itself and adjacent sites (IP206 and IP211). Without these changes, the Final Draft is unsound.</p> |
| <b>Site Allocations and Policies<br/>(Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 4: Policy SP3.</b>       | <p><b>Land with Planning Permission or Awaiting a Section 106.</b></p> <p>The Company supports the intentions underlying Policy SP3 and, in particular, the identification of Sites IP206 and IP211. The Company still considers, however, that the capacity figures are on the conservative side (and should be increased by up to 50%), with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035).</p> <p><b>Summary:</b> Object for the reasons set out above.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Site Allocations and Policies<br/>(Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 5: Paras 5.1 to 5.8.</b> | <p><b>IP-One Area</b></p> <p>The Company supports the general vision for the IP-One area (see also representations made with respect to Core Strategy Chapter 6: Vision and Objectives and Spatial Strategy).</p> <p><b>Summary:</b> General support</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| <b>Document(s) and document part.</b>                                                                                                                                    | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 5: Policy SP11 and paras 5.17 to 5.23.</b> | <p><b>The Waterfront</b></p> <p>The Company fully supports this Policy.</p> <p><b>Summary: Support</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 5: Policy SP15 and paras 5.32 and 5.38</b> | <p><b>Improving Pedestrian and Cycle Routes</b></p> <p>The Company supports the general thrust of the Policy, including the proposals to improve pedestrian links between the Central Shopping Area and Waterfront. However, there are still serious concerns about how these proposals impact upon the development of Site IP035.</p> <p><b>Summary: Qualified Support</b></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 6: Merchant Quarter</b>                    | <p><b>The Merchants Quarter</b></p> <p>The Company controls three of the most important sites (IP035, 1P206 and IP211) in the Merchants Quarter and it is concerned that the Development Options plan (page 82), together with the Development Principles (as expressed in the table on page 83 &amp; 84), are not sound in that they will render development unviable and frustrate proposals to bring the sites forward. Whilst the Company does not take issue with the objectives for the Merchants Quarter, it is of the view that:-</p> <ul style="list-style-type: none"> <li>• North-South Linkages through Site IP035 are in the wrong location.</li> <li>• Proposals for a new 'urban focal space' on Site IP035 are oversized and over-ambitious.</li> <li>• Site IP035 is capable of accommodating buildings of more than five storeys in height without having an adverse impact upon the setting of adjacent listed buildings or the historic environment.</li> </ul> <p>This representation should be read together with the comments made</p> |

| <b>Document(s) and document part.</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
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|                                       | <p>with respect to the Site Allocations and Policies Document Chapter 5: Policy SP2.</p> <p>Summary: Object</p>     |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

#### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

#### **PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan-making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

80

**Felicia Blake**

---

**From:** Philip Charles  
**Sent:** 29 February 2020 09:29  
**To:** PlanningPolicy  
**Subject:** British Telecom, Bibb Way/Handford Road

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi,

I am writing in response to the proposed changes to the former British Telecom building on Handford Road/Bibb Way. I am a resident of Alderman Road and a daily user of the Alderman Nature reserve and canal that runs alongside the BT building.

My question would be are there any plans for developing the area of the nature reserve and canal on Bibb Way that is in front of the BT building? As I am sure you are aware it is an area that is often frequented by drug users and has become rather neglected. That being said it is a haven for wildlife and in the past 12 months I have seen badger, otter and bats on that corner as well as the foxes every day who have a den there also. Whilst I do not oppose the conversion of the building into residency I am concerned for the potential impacts on the wildlife in that area. Are there any plans for development or alteration to the canal or tow path?

Thank you and I look forward to hearing from you.

Best, Philip.

---

Philip Charles

**Felicia Blake**

---

**From:** J Churchyard1  
**Sent:** 04 February 2020 14:27  
**To:** Felicia Blake  
**Subject:** Boat yard development objection

To whom it may concern regarding the development of the old boatyard cullingham rd.  
I and everyone effected by this plan to put housing so close to river are shocked this would even be considered  
there are several reasons why

1 This according to ibc own maps show this to be a high risk area for flooding

2 The sewers which run this road struggles as it is. So adding more houses to an already strained system will lead to major problems.

We have had anglian water out three times in the last 10years to jet to overloaded system  
. At the moment it is a mostly grassed area which allows water to soak away the surface area of roofs driveways ect would cause more problems

3 I'm always finding goldcrest newts in my back garden so the whole bank and surrounding area is their habitat

4 parking down this road has always been a issue adding more houses is just going to make it worse so each house would require at least two spaces per house

5 The building which would be pulled down will be full of asbestos which if some fly by night demolition team took the job on would pose a significant health danger to us the residents

6 Who will be responsible for the damage to our property if any damage is caused by heavy machinery such as pile driving if has to be done.

7 We do not want our back gardens overlooked a sunlight blocked just so someone can make a quick buck

So please reconsider this because this will not make a improvement to the St. It will damage our environment, risk our property to flooding. I will keep a copy of this email and if we suffer any flooding I will gladly show local papers

Yours sincerely Jamie churchyard

cc: -

.

Sent from my Sony Xperia™ smartphone

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

|                                                                      |                                                                                                                                                                                                                                                         |
|----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Consultation document(s) to which this comments form relates:</b> |                                                                                                                                                                                                                                                         |
| <b>Please return this comments form to:</b>                          | <p><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</p> <p><b>Planning Policy Team<br/>Planning and Development<br/>Ipswich Borough Council<br/>Grafton House<br/>15-17 Russell Road<br/>Ipswich<br/>IP1 2DE</b></p> |
| <b>Return by:</b>                                                    | <b>11.45pm Monday 2<sup>nd</sup> March 2020</b>                                                                                                                                                                                                         |
| <b>This form has two parts:</b>                                      | <p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>                                                                                                                                                                         |

| <b>PART A PERSONAL DETAILS</b>                |                            |                                           |
|-----------------------------------------------|----------------------------|-------------------------------------------|
|                                               | <b>1. Personal details</b> | <b>2. Agent's details (if applicable)</b> |
| <b>Title</b>                                  | Mr                         |                                           |
| <b>First name</b>                             | Charles                    |                                           |
| <b>Last name</b>                              | Croydon                    |                                           |
| <b>Job title (where relevant)</b>             |                            |                                           |
| <b>Organisation (where relevant)</b>          | Clean Air Ipswich          |                                           |
| <b>Address<br/>(Please include post code)</b> |                            |                                           |
| <b>E-mail</b>                                 |                            |                                           |
| <b>Telephone No.</b>                          |                            |                                           |

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

|                                                                      |                                     |
|----------------------------------------------------------------------|-------------------------------------|
| Your name or organisation ( <i>and client if you are an agent</i> ): | Charles Croydon (Clean Air Ipswich) |
|----------------------------------------------------------------------|-------------------------------------|

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

| Document(s) and document part. | Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                | <p><b>Extensive modal shift is required in Ipswich to improve air quality and reduce carbon emissions but also to reduce the impacts of traffic from new developments.</b></p> <p><b>Suffolk County Council modelling indicates just over 15% modal shift is required in Ipswich by 2026 (as well as junction improvements etc to the existing network) yet sustainable travel options in Ipswich are poor and need considerable investment. There is insufficient evidence that the required funding to deliver the required improvements is available.</b></p> |
|                                | <p><b>The Local Plan is unsound because there are insufficient actions and investment proposed to improve air quality and to deliver the required levels of modal shift.</b></p>                                                                                                                                                                                                                                                                                                                                                                                 |
|                                | <p><b>Given the high levels of modal shift required but the cycling network is so poor people will not want to cycle and there is lack of cycle training to help people feel confident and safe.</b></p>                                                                                                                                                                                                                                                                                                                                                         |
|                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

| <b>Document(s) and document part.</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|                                       |                                                                                                                     |
|                                       |                                                                                                                     |

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

| <b>Document(s) and document part</b> | <b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b> |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------|
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |
|                                      |                                                                                                                     |

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**      Yes

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**      yes

**Adoption of the Ipswich Local Plan Review.**      Yes

**PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

Planning & Development Department  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE



Tuesday 11<sup>th</sup> February 2020

Dear Sirs,

**King George V Field, Old Norwich Road, IP032 (UC033)**

I refer to the recent proposed local plan site allocation and would wish to comment on behalf of the Trustees of the King George V Field.

The use of this field for housing purposes has been under discussion with various developers and indeed your own council staff for probably as long as twenty years. The original developments envisaged housing to be over the entire site rather than partially over the site which the current plan seems to indicate. For the playing field to regenerate itself the intention was for the site to be sold for housing development and then a multi-sports field produced in the general area of Whitton but on a separate site.

Very clearly if this development goes ahead as it stands these plans would have to go out of the window as the Trust would not have sufficient funds to properly develop a multi-purpose site which is part of their original brief when set up.

You will equally understand that we cannot vacate the site and indeed it is in danger of "crumbling" around us because of indecision over the years.

The latest council officer involved has been a Helen Pluck but various officers have had contact with us over the years.

You will understand that it is not the principle that the Trustees would be concerned about but the partial use of the site and indeed it cannot be vacated until alternative arrangements have been made.

I would also comment that the Trust did not have any notification directed to it other than it being picked up by chance.

Please confirm that this letter is registered as a comment / objection.

Yours faithfully

D.J.Coe  
Trustee

**Felicia Blake**

---

**From:** Tom Cole  
**Sent:** 28 February 2020 16:19  
**To:** PlanningPolicy  
**Cc:** Paul Burley  
**Subject:** Ipswich Local Plan Review Final Draft Consultation - Constable Homes Ltd - Red House Farm  
**Attachments:** 280220 Red House Farm Reps FINAL.PDF

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir or Madam,

Please find enclosed representations made on behalf of our client, Constable Homes Ltd, relating to Red House Farm, Tuddenham Road.

The representations are made in response to the Ipswich Local Plan Review Final Draft Consultation.

I would be grateful if you could respond to confirm receipt of this email.

Regards,  
Tom

**THOMAS COLE**  
SENIOR PLANNER

Montagu Evans LLP, 5 Bolton Street, London, W1J 8BA

Property Week Best Places to Work 2018 and 2019



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5 Bolton Street  
London  
W1J 8BA

Planning Policy  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

28 February 2020

Sent by email to: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Dear Sir or Madam,

**IPSWICH BOROUGH COUNCIL LOCAL PLAN REVIEW FINAL DRAFT CONSULTATION  
RED HOUSE FARM, TUDDENHAM ROAD**

**Introduction**

We write on behalf of our client, Constable Homes Ltd, to make representations in respect of the Ipswich Local Plan Review Final Draft, consisting of:

- The Core Strategy and Policies Development Plan Document (DPD) Review Final Draft; and
- The Site Allocations and Policies (incorporating IP-One Area action Plan) DPD Review Final Draft.

The final draft Local Plan sets out the Council's policies for growth in the Borough up to 2036.

These representations relate to the promotion of Red House Farm for residential development. Our client has engaged with previous plan-making stages in responding to the Call for Sites and Regulation 18 consultation exercises, and has entered into pre-application discussions with the Council and Highways Authority.

By way of background to these representations, Constable Homes Ltd has an interest in the land referred to as Red House Farm. Constable Homes is an operating subsidiary of the Anderson Group, which is a private development and construction business with an exceptional track-record of delivery across the south-east.<sup>1</sup> As a case in point, Anderson Group is currently nearing completion of 93 new homes off Europa Way in Ipswich Borough ('Jasmine Park'), and this has delivered around 50 completions per annum.<sup>2</sup>

The extent of our client's ownership is defined by the red line shown on Figure 1 below. The site is located to the north of Ipswich and comprises several fields and a 19th Century former farmhouse and outbuildings. The woodland and mature trees on-site are subject of a Tree Preservation Order ('Land between Tuddenham Road and Westerfield Road, No 7 2001'). The parcel of land is currently accessed by vehicles from Tuddenham Road and extends to circa 6.5 hectares in area. It is adjacent to residential dwellings to the south and is bound by agricultural land to the east, west and north.

Westerfield National Rail station is located approximately 500 metres to the north of the site and is served by a regular trains service between Felixstowe and Ipswich.

<sup>1</sup> <https://www.andersongroup.co.uk/>

<sup>2</sup> <https://www.andersongroup.co.uk/project/europa-way/>

**WWW.MONTAGU-EVANS.CO.UK**

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**Figure 1: Red House Farm**



Source – Google Maps

The site is identified as part of a Strategic Housing Site in the adopted Local Plan (2017) which is referred to as the Ipswich Garden Suburb.

Under draft Policy CS10 of the emerging Local Plan, the Ipswich Garden Suburb is expected to deliver 3,500 homes across three neighbourhoods referred to as Henley Gate (east of Henley Road and north of the railway line), Fonnereau (west of Westerfield Road and south of the railway line) and Red House (east of Westerfield Road). Red House Farm is located in the Red House neighbourhood.

#### **Response to the Draft Plan**

The representations are set out against the draft policies in the Core Strategy and Policies Development Plan Document Review Final Draft dated January 2020. As the site is allocated as a strategic site in the Core Strategy, the draft Site Allocations Document has no policies of relevance and so is not discussed further in these representations.

#### **Policy CS7: The Amount of Housing Required**

Draft Policy CS7 sets out the Council's proposed strategic housing policy. It establishes that the Council's minimum housing requirement is at least 8,010 dwellings for the period of 2018 to 2036, which equates to an annual average of 445 dwellings. The housing land supply would comprise a combination of site allocations with a windfall allowance of 50 units per annum between 2022 and 2036, which results in a total of 7,214 units. This is inconsistent with the minimum housing requirement of 8,010 units. We presume that this shortfall of 796

units is as a result of the housing supply period being reduced by a year from the base date of the Plan to 2019-2036 as per Table 4 of the Plan. This should be clarified by the Council.

The Government published the Housing Delivery Test 2019 measurement on 13 February 2020. Ipswich only delivered 611 homes across the previous three years against a target of 1,319 homes across the period. This equates to 46% of the minimum target which means that the Council is a "buffer authority". We note that the 2019 calculation uses 445 homes per annum and so reflects that of draft Policy CS7. In the previous year, the measurement for Ipswich Borough Council was 66%. This indicates that the Council's housing delivery has worsened and that measures need to be taken to recover the position. It is also very close to the 45% threshold in 2019 NPPF paragraph 215b. That threshold will increase to 75% next year which only serves to reinforce the urgency of addressing the significant shortfall in housing delivery. The Council should be proactively identifying opportunities to accelerate delivery to overcome this.

Paragraph 73 of the NPPF is therefore relevant, which states that strategic policies in respect of housing land supply should include a buffer of 20% to the five year housing land supply, where "*there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply*".

This adds to significant challenge of meeting 75% of need by November 2020 as set out in Paragraph 215c of the NPPF. It is assumed that this date is February 2021. No buffer has been applied to Policy CS7. In order for the Plan to be effective, a buffer equivalent to one year's supply (445 dwellings) units should be added to the five year housing land supply.

The NPPF is clear that, as a minimum, plans must seek to meet the area's objectively assessed needs in order to be found sound and so this should be set out within the Plan. The Council is in a critical position of acute under supply and failing to quantify the true need increases the likelihood that the unmet need will not be addressed. It is evident that an immediate review of the Plan will be necessary if the Council is only targeting a capped need figure.

#### Policy CS8: Housing Type and Tenure

Draft Policy CS8 explains the Council's policy approach to housing type and tenure is to plan for a mix of dwelling types to be provided to achieve strong, vibrant and healthy communities. In order to expedite the early delivery of residential development at Red House Farm, our client had considered the suitability of pursuing a scheme with an element of care accommodation as an alternative to a conventional residential scheme of around 100 C3 Class dwellings. In the Council's pre-application advice to our client, it has been suggested by Officers that there is no need for elderly accommodation in the Borough.

This is despite the Ipswich Housing Market Area Strategic Housing Market Assessment (SHMA) Part 2 Partial Update (January 2019) explaining that housing need projections indicate that the population aged 65 or over is set to "*Increase dramatically in the HMA over the plan period; from 104,985 to 153,578 in 2036, a rise of 46.3%*" (our emphasis). Despite this, the Council has taken the position that the SHMA identified no further need for specialist housing for the elderly and that a retirement living proposal at Red House Farm would not be supported by the Council.

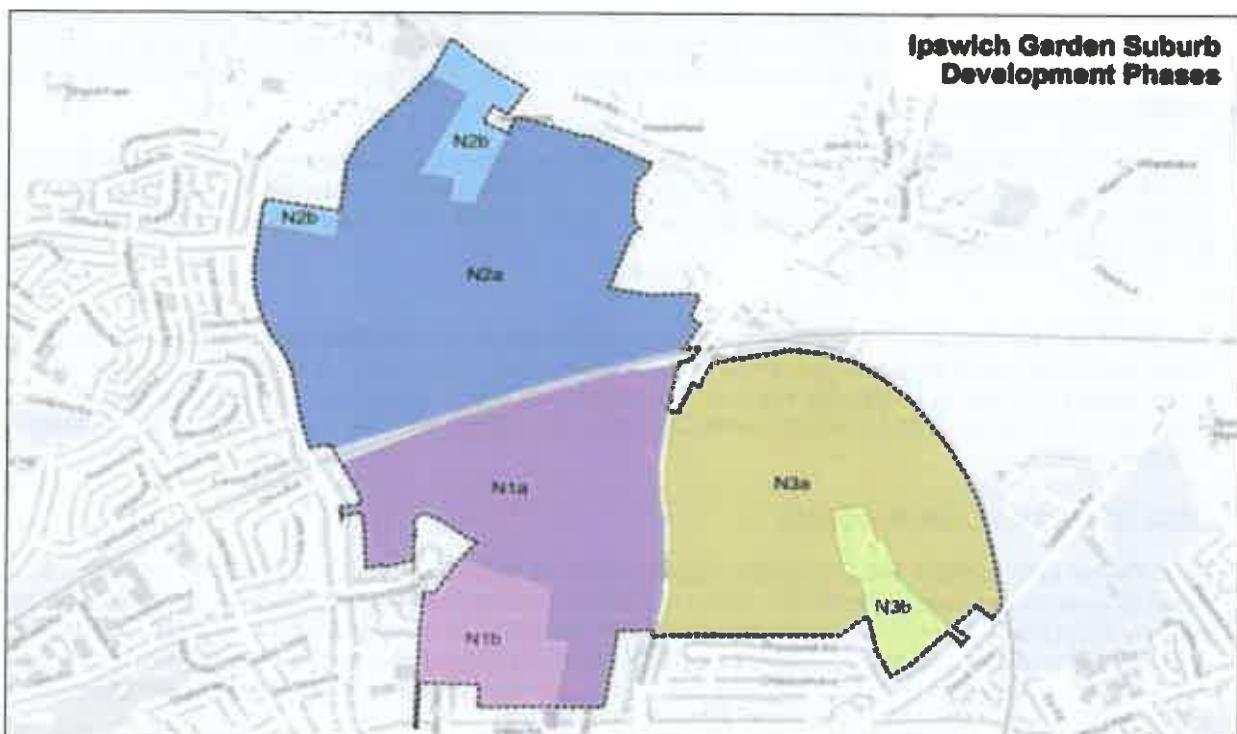
In response, we remind the Council that draft Policy CS8 does not separate elderly provision from other forms of housing and so it would effectively contribute to the Council's five year housing land supply. It is therefore somewhat surprising that the Council is not actively encouraging this form of development in the context of pressing overall needs. It is also relevant to note that a retirement village scheme is plainly a different form of housing provision to sheltered housing and so identifying a surplus of sheltered housing in the SHMA does not mean that there is no need for development to cater for the elderly. As such, the Council's position on this matter is not supported. Policy CS8 should be expanded to acknowledge that retirement living proposals are supported in order for the Plan to be effective. We also note the additional trickle-down benefits that would be achieved through down-sizing which will release family housing in established areas, which some buyers may prefer to new-build development and this would contribute to the diversity of housing supply. Our client will

continue to engage proactively with the council to agree an appropriate form and type of residential scheme on this discrete area of the Garden Suburb.

**Policy CS10: Ipswich Garden Suburb**

Draft Policy CS10 outlines that the spatial strategy regarding the scale and location of housing growth is to deliver 3,500 homes within the Garden Suburb. This is consistent with the adopted policy position. Our client's land is identified as part of the Garden Suburb allocation (area N3(b)) (Figure 2 below). This has been carried through from the Regulation 18 consultation and is supported by our client, reflecting that the site is inherently sustainable, suitable and available for residential-related development.

**Figure 2: Ipswich Garden Suburb Development Phases Plan**



Source – Ipswich Borough Council

We welcome that the Council is considering how the wider site might come forward for development, however we reiterate our concerns made at Regulation 18 stage that the Council continues to number the phases in a way that implies they should be delivered in numerical order; the phases are labelled N1(a), N1(b), N2(a), N2(b), N3(a) and N3(b). As explained above, Red House Farm incorporates a former farmhouse and outbuildings, and there are mature trees that line the boundaries of the plot. We note that the indicative masterplan shown by the Ipswich Garden Suburb SPD (2017) prioritises these features being retained and therefore, provided that the ability to connect other parcels is not prejudiced, development of this site can come forward in a self-contained manner.

As explained to the Council during pre-application discussions, our client has devised a way for Red House Farm to come forward for development at the earliest opportunity, in a manner that is independent of the wider masterplan but that does not conflict with the SPD. Development could be achieved by retaining existing buildings on site and existing trees around its periphery that would robustly screen a future proposal.

Our client's highways advisor, Caneparo Associates, has designed an effective and safe access arrangement in which the existing access from Tuddenham Road can be utilised to serve the development without severe



Impacts as per Paragraph 109 of the NPPF. This can be achieved by restricting access to residents only at this time, and then for general use, public transport and cycles in the future once the remaining road infrastructure is in place within the Red House Neighbourhood as per the Garden Suburb SPD (2017) requirements.

To that end, we are surprised that when the Council interprets its own policy that this development would be precluded rather than positively facilitated. It cannot be the intention of the planning system to delay much-needed development, particularly when the Government is clear that LPAs should act positively to enable development to be brought forward. The Council clarify its approach in order that the Plan is not ambiguous and therefore effective. As advocated by the NPPF, planning policies should be sufficiently flexible to ensure that they do not act as a burden to the delivery of development. This identifies a fundamental issue with the policy and the Council must reconsider how it proposes to operate the draft allocation in light of this.

We therefore suggest that the policy wording be amended to outline how each parcel could come forward individually, whilst still being in general accordance with the Council's growth strategy and the requirement for balanced growth across the strategic allocation. This could facilitate the timely delivery of residential accommodation, as recognised at paragraph 68(d) of the NPPF, especially in the context of the Council's housing supply position which is fast deteriorating.

#### Concluding Remarks

Our client welcomes and supports that the draft Plan to identify the site for development through its continued allocation within the Ipswich Garden Suburb. This reflects that the site represents a suitable, available and deliverable site, and offers a realistic prospect for the delivery of a significant quantum of C-class housing development within the emerging Plan period. This must be realised in a fashion that looks to facilitate the timely development of the site and not act as an impediment to this and we request that the Council reconsiders its current approach to ensure that its Local Plan will be effective.

Constable Homes Ltd is eager to continue to positively engage with the Council through Plan-making and will continue its pre-application discussion with the authority to refine the proposals at Red House Farm. We request that we are kept informed of any policy updates going forward. We would like to have the right to participate at any oral examination if necessary.

If you have any queries regarding this submission, or would like to discuss the proposals further, please do contact Paul Burley or Tom Cole at this office.

Yours sincerely,

*Montagu Evans*

Montagu Evans LLP

**From:** \_\_\_\_\_  
**Sent:** 15 January 2020 12:54  
**To:** PlanningPolicy  
**Subject:** Fwd: site ref IP307-Prince of Wales Drive

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

>>> To whom it may concern

>>> Firstly, I am surprised and saddened to think what was a piece of land sustained as a possible siting for twelve dwellings, Boyer are now intending to increase that number to eighteen. (Boyer leaflet distributed to some residents) I think the current proposal is too dense and totally out of character with the openness of the surrounding area. The plans would make it claustrophobic and cause a lot of distress, I fail to see any enhancement or asset to the area.

>>> Having lived here for over fifty years there have been many changes, mostly in highway traffic. Prince of Wales Drive is a nightmare with parking and the volume of traffic throughout the day and into the evening. Halifax School is the 'bottle neck' so to speak. As residents we have ongoing confrontations with unthinking parents whose children attend Halifax School, they tend to think it a given right to park wherever they like. This happens on a daily basis concerning parking across and turning in driveways with no thought or consideration to residents who may have to attend hospital appointments and the like. Currently the School is advising there is 'designated parking' within the parking area which is currently being used by AGE UK. You can count anything from 20/25 cars daily, mainly staff members, yet dinner ladies for some reason are not allowed to park over there, hence they and other part time members will park on the road or use the lay-by. What and where will these cars park if the plans go ahead?

>>> With proposed plans for houses to be built so close to the edge of the road, what are the chances of car owners just parking on the pavement? You only have to look on Streetview at no 27 to see what I mean. Two of the houses have no parking so they either park on the pavement or use the current car park. Residents in Aberdare Close suffer verbal abuse as do many of us regarding parking facilities. I have recently noticed the School leaves their traffic cones out on the road all day, due to the fact that coaches plus delivery lorries cannot draw up outside the school to unload.

>>> We have outstanding views of the River Orwell which give us immense pleasure, but if these plans go ahead these will be lost and replaced with houses which means we will be overlooked and suffer a loss of privacy, not to mention the added noise nuisance. Is it not within our Human Rights to be able to enjoy the peace and quiet of our own dwellings?

>>> Would bungalows be another option? They would certainly fit in much better and provide people with homes (maybe even disabled people) but definitely not two storey houses or three storey flats which would be totally out of character to the surrounding area.

>>> With the School, Dentist and Doctor's being over subscribed what would be the next option? What recreational space would be provided considering there is nothing shown on the plans? It would be a shame to see the garden at the front of the shops dug up because a lot of wildlife including foxes frequent this area.

>>> I would like to ask if Halifax School has been approached in favour of building an extension (Nursery) on the land? This would have a two fold solution, more much needed places for children within the area plus it would alleviate the continuing parking problems. It would also mean the local residents would get some respite, something nobody seems to consider.

>>> I understand the AGE shop takes £100,000 per year, it has been a very valuable asset to our community and in hindsight it is a great pity the Co-op never opened a smaller shop which would enable people to buy their daily necessities. They do advertise that they care for the local community! Apart from local residents you have parent's at the School plus next door to them there is the Prince of Wales Drive Nursing Home. People with money to spend and what choice do they have? With so much being placed on people's mental health nowadays, we need somewhere like a shop and a community place to bring people together. We are an ageing population in this area

and many do not have the capabilities to either walk down to Maldenham let alone up to Asda in the opposite direction for shopping. We are on the brow of a hill which makes it very difficult.

>>> Thank you for reading my comments, I only hope this makes someone rethink the proposed plans.

>>> Kind regards

>>> RoseMarie Cornish (Mrs)

>>> Sent from my iPad

## **Felicia Blake**

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**From:** RoseMarie Cornish <.....  
**Sent:** 23 February 2020 16:02  
**To:** Felicia Blake  
**Subject:** IP307 Planning Proposal

Dear Felicia

I hope this finds you well.

Please find my changed objection letter as promised. I will send photo's separately.

Kind regards

RoseMarie

~~~~~

Dear Sirs / Madam

It saddens me to think the Co-op have decided there is no need for a shop on this land but I beg to differ and think they have just set their sights on building houses.

The former Co-op was doing very nicely (Takings of £4000 on a Sunday) but it threw in the towel once Asda opened its doors on Stoke Park Drive. Next door to the Co-op was a very successful hairdressers alongside a Kitchen Design store but these were given notice and our community fell apart. If you look at the Chantry / Pinewood area they have three Co-op stores in very close proximity to the new Aldi, then just up the road there is the huge Tesco Store plus B&M and coming this way there is Asda. Sometimes the traffic flow is so bad at the latter that vehicles are queuing out on the road to get in. It kind of defeats what the Co-op are saying about their store not being viable.

We are on the brow of a hill with an ageing population and some of us and not very mobile making it near impossible to travel down and up to Asda. Come to that, younger families without transport have an awful long way to walk from Maidenhead to Asda.

The Co-op, (slogan, local caring shop) was the hub of the community, once they decided to close that and the adjoining stores, the community spirit fell away. People have become very isolated and with this comes depression. Mental health is a big issue nowadays and I hope this is taken into account when considering the proposals.

AGE UK ran a very successful shop within the former Co-op, (taking £100,000 per year) they had so many plans to set up a little cafe and a community centre within the store. These are things we desperately need in this area as we have nothing to bring the community together. I contacted AGE UK and they replied saying it wasn't their choice to close and given the chance they would carry on.

We bought our property over 50 years ago and have seen a great many changes. The main reason in buying was the stunning and iconic view up the River Orwell, no bridge back in 1969. This is something which can be enjoyed by many people in this part of town and it would be criminal and heartbreaking if we were to lose that wondrous view. Lord Belstead was insistent that the land in this area was as open as possible giving people the feeling of fresh air and well being. To think of blocking this with two storey houses plus a three storey block of flats would be heartbreaking.

I notice on the planning proposal that the current green spaces would be removed.

Again I wish to object to this because these are very important habitats, the piece of land in front of the main store attracts a lot of wildlife, goldfinch, blue and great tits; plus foxes. The great stag beetle (an endangered species) returns year after year and I for one have registered sightings of it. On the proposal plans I can see no green areas, no community areas, no bin or bike storage, surely that is wrong?

On the subject of Highway, the proposed area is a pressure point for traffic with it being directly opposite Halifax

School. When there are delays on Wherstead Road, Belstead Road or Heaven forbid the Orwell Bridge is closed, Prince of Wales Drive then becomes a 'rat run' with vehicles, including HGV's trying to find a way through. The school itself generates so much traffic from staff, and neighbour's have ongoing confrontations with blocking driveways and inconsiderate and abusive parent's every day. The school were given permission, and are still using the former Co-op car park as an overspill for their staff and visitors. It removes some of the vehicles from Prince of Wales Drive yet there is still a problem. Bus drivers have been known to call the Police due to cars blocking either side of the road making it impassable. Only last week we had cars parked all along the side of the bungalows, a bus was trying to manoeuvre up the road when a very irate woman tried to overtake the stationary cars coming face to face with the bus driver. Obviously the poor bus driver had right of way, yet the car driver got out of her car and was very abusive to him. In the end she had to reverse back up the road but these are ongoing situations. Traffic collisions are not uncommon but thankfully up to now, nothing too serious.

Red cones are left on the road outside the school all day to stop cars parking across the entrance but fail to do much good even with the caretaker in attendance. School buses ferrying children about plus delivery lorries have to unload on the actual road because they can't access the school. The lay-by outside the school is forever blocked with staff cars. I will attach photo's giving you an idea of the problems.

Thank you for reading my comments, please feel free to contact me should you wish to discuss any of the points which I have raised.

Yours sincerely  
RoseMarie Cornish (Mrs)

Sent from my iPad

**Felicia Blake**

---

**From:** RoseMarie Cornish --  
**Sent:** 23 February 2020 16:07  
**To:** Felicia Blake  
**Subject:** Fwd: IP 307 Photo's attached

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Felicia

These are the photo's which relate to my previous email. I hope they make sense.

The first one is of the green space outside the old Co-op

Photo 2 & 3 show a school bus which collects or drops the children off on the road, the red cones are on the road all day.

Photo 4 & 5 show how staff/visitors leave their cars on Prince of Wales Drive.

Kind regards

RoseMarie

Sent from my iPad

**Begin forwarded message:**

**Subject:** IP 307





## **Felicia Blake**

---

**From:** Cycle Ipswich  
**Sent:** 02 March 2020 21:54  
**To:** PlanningPolicy  
**Cc:** Felicia Blake; info@cycleipswich.org.uk  
**Subject:** Re: EXTENSION OF TIME: Notice of Public Consultation Ipswich Local Plan Review Final Draft

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hello,

It's all very well having local plans, however relying on developer funding to make them actually happen is going to mean very little progress. Politicians need to properly fund the changes required as a political choice. Similarly, there's no point voting for a climate emergency when there's no serious funding to support it.

There needs to be a radical step change in the quality of and funding of walking, cycling, and public transport infrastructure. This focal plan is not radical enough.

To solve the air quality, obesity, health issues due to physical inactivity, traffic congestion, etc, there needs to be a step change in the modal shift and improved walking and cycling infrastructure. Park and Ride facilities have a negative impact on rural bus services outside of Ipswich, thus rural bus services should be prioritised over park and rides.

There is nothing in POLICY CS20: Key Transport Proposals about reducing rat running on residential roads, increasing the use of 20mph speed limits (as has happened in parts of London and all of Edinburgh), nor implementing protected cycle tracks on main roads. All of which are key to getting the modal shift required to reduce congestion and air pollution.

With the proposals in the local plan, there's likely to be very little change in the levels of walking and cycling in Ipswich. People currently only choose to walk or cycle in limited parts of Ipswich due to the very limited bits of infrastructure that exist, even then it's despite the conditions, not because it's a wonderful experience, or due to it being faster and more convenient than driving for short journeys.

Kind regards,

Shaun McDonald  
On behalf of Cycle Ipswich

On 24 Jan 2020, at 09:01, Felicia Blake <[Felicia.Blake@ipswich.gov.uk](mailto:Felicia.Blake@ipswich.gov.uk)> wrote:

Dear Sir/Madam,  
Please see attached.  
Kind regards,  
If you wish to be taken off our email list please reply to me or email [PlanningPolicy@ipswich.gov.uk](mailto:PlanningPolicy@ipswich.gov.uk)  
Felicia Blake  
Business Support Officer  
Planning and Development  
Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1 2DE  
Tel: 01473 43 2019  
Email: [felicia.blake@ipswich.gov.uk](mailto:felicia.blake@ipswich.gov.uk)

Web: [www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Facebook: <https://www.facebook.com/IpswichGov>

Twitter: [twitter.com/IpswichGov](https://twitter.com/IpswichGov)

Achieve your fitness goals with an iCard Active [www.ipswichfit.co.uk](http://www.ipswichfit.co.uk)

Useful Links:

**Current Consultations**

<https://www.ipswich.gov.uk/currentconsultations>

**Closed Consultations**

Draft Suffolk Coast European Sites Recreational Disturbance Avoidance and Mitigation Strategy

Supplementary Planning Document (SPD) <https://www.ipswich.gov.uk/suffolk-coast-rams-spd>

Ipswich Local Plan Review Preferred Options <https://www.ipswich.gov.uk/ipswichfuture>

Conservation Areas Designation <https://www.ipswich.gov.uk/content/about-our-conservation-areas>

**Forthcoming Decisions List**

<https://democracy.ipswich.gov.uk/mgListPlans.aspx?RPId=135&RD=0&bcr=1>

**Recently Adopted**

<https://www.ipswich.gov.uk/content/urban-character-supplementary-planning-document>

<https://www.ipswich.gov.uk/content/public-consultation-ipswich-town-centre-waterfront-public-realm-strategy-spd>

<https://www.ipswich.gov.uk/content/urban-character-supplementary-planning-document>

<https://www.ipswich.gov.uk/content/development-and-archaeology-supplementary-planning-document-spd>

**Adopted Ipswich Local Plan 2011-2031**

<https://www.ipswich.gov.uk/content/adopted-ipswich-local-plan-2011-2031>

**Additional Planning Policy Links:**

<https://www.ipswich.gov.uk/localplan>

<https://www.ipswich.gov.uk/content/local-development-scheme>

<https://www.ipswich.gov.uk/services/ipswich-garden-suburb-northern-fringe>

<https://www.ipswich.gov.uk/services/community-infrastructure-levy> - Update only

For information about how Ipswich Borough Council processes personal data please visit [www.ipswich.gov.uk/privacy](http://www.ipswich.gov.uk/privacy)

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<Public consultation letter Ipswich Local Plan Final Draft 24th January 2020.pdf>

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**D**





**Our Ref: DfE/Local Plan/Ipswich 2020**

**2<sup>nd</sup> March 2020**

Dear Sir/Madam,

**Re: Ipswich Local Plan Review: Core Strategy and Site Allocations DPDs**

**Consultation under Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012**

**Submission of the Department for Education**

1. The Department for Education (DfE) welcomes the opportunity to contribute to the development of planning policy at the local level.
2. A response was made to the Regulation 18 consultation in March 2019 and raised the following points:
  - Support for site allocations at Ipswich Garden Suburb (Policy CS10); Co-op Depot (Policy CP7/allocation IP010a) and Mint Quarter (allocation IP048a). This recommended ensuring that the Regulation 19 consultation included details of phasing, delivery and further site-specific requirements.
  - Proposed site allocation at the Former Co-op Department Store site on Carr Street for a 2FE Primary School to deliver the Central Ipswich Free School.
  - Suggestion of site allocation for D1 use at Woodbridge Road site (allocation IP129) to allow Suffolk County Council to open a SEND school at the site.
3. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient school places, including those at sixth form, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We have published guidance on education provision in garden communities and securing developer contributions for education, at <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>. You will also be aware of the corresponding additions to Planning Practice Guidance on planning obligations, viability and safe and healthy communities.

4. We would like to offer the following comments in response to the above consultation documents (hereafter referred to individually as the CSDPD and SADPP).

#### **Soundness**

5. As you will be aware, the primary focus at this stage of the Local Plan's preparation is on the soundness of the plan, with regard to it being positively prepared, justified, effective and consistent with national policy. The following detailed comments set out DfE's view of the plan's soundness in respect of education provision.
6. The CSDPD notes that 7% of the borough is employed in education, and that there is a need to reduce inequality and social exclusion, including children living in poverty. The provision of sufficient and quality education is critical to supporting this.
7. Paragraph 4.33 of the SADPD sets out the context of the increase in primary school aged children and the need to make sufficient provision for this rise over the Plan period. It should be noted that significant housing growth is expected in the town centre (as per CSDPD Policy CS2).
8. CSDPD Policy ISPA2 includes education provision as a strategic infrastructure priority. The Education Provision Policy approach at CSDPD Policy CS15 sets out that new primary school capacity provision will be needed, and that sites to meet this will be allocated.
9. DfE supports the Council's prioritisation of education infrastructure, and the allocation and safeguarding of land for schools as set out in the following policies (in both the CSDPD and SADPD):
  - Ipswich Garden Suburb (Policy CS10) – 1 secondary school and 3 primary schools;
  - Co-op Depot (Policy CP7/allocation IP010a) – school expansion;
  - Mint Quarter (allocation IP048a) – primary school; and
  - BT Depot Woodbridge Road (allocation IP129) – SEND School.
10. As IBC will be aware, DfE is progressing a centrally approved 2 FE Free School (Central Ipswich Free School) to assist in meeting this Primary School need within the Mint Quarter allocation IP048a. A specific site has been identified at Carr Street (former Co-op Department Store site) within this allocation to deliver this. Suffolk County Council ('SCC') as the authority with a statutory duty to provide sufficient school places, have a requirement for the Central Ipswich Free School based on the basic need from the town centre area. It is demonstrated that there is a shortfall of capacity across the two school planning areas (there are extremely limited places available at existing town centre schools), as well as need generated by new housing development in this area identified in the SADPD. Therefore, there is significant demand for this school. Currently, there are increasing pressures with town centre schools being oversubscribed, as well as bulge classes being required and primary school pupils having to travel out of their local area to go to school. The further housing growth identified through the DPDs will exacerbate existing issues and therefore it is critical that the school is able to be delivered.

11. The site is located so as to best meet the needs arising from its catchment – in accordance with Policy DM24 part d. SCC undertook a site search exercise and identified no other suitable, available sites to meet this local need for primary school places.
12. DfE met with IBC in early 2020 to engage in pre-application discussions, regarding more technical and design matters to progress the project. Further detailed work will be undertaken to respond to IBC's comments, and in due course further pre-application work will be undertaken in liaison with IBC in order to move towards submission of a planning application later this year. The school is required as soon as possible in order to meet existing need and to cope with the housing growth likely to be experienced in the town centre.
13. There are some generic requirements in the overall allocation policy IP048 which are considered to cause potential conflict with the delivery of a Primary School expeditiously at the site. The requirement to develop residential uses at upper floors would not be necessarily wholly deliverable with a Primary School and therefore we would propose that the supporting text to the allocation makes clear that residential accommodation should only be provided where feasible and appropriate. The 'Development Principles' for Mint Quarter in the SADPD sets out that development should '*respect and enhance setting of Listed and historic buildings*'. This is not considered to wholly comply with the NPPF, specifically paragraph 197 which requires an assessment of the asset's significance (with regard to non-designated assets), and a balanced judgement to be made thereafter. Furthermore, NPPF paragraph 184 dictates that assets '*should be conserved in a manner appropriate to their significance*', which does not necessarily equate to '*enhancement*' in every scenario. The terminology '*historic building*' is also not robust or consistent with the NPPF. Therefore, we propose that the wording be amended to reflect the requirements in the NPPF, and the distinction between designated and non-designated assets.
14. SADPD Policy SP2 sets out the requirements for site allocations. Allocation IP048a includes the Primary School. DfE has concerns that the allocation wording is too restrictive and could potentially frustrate and delay the delivery of the school, which would have significant consequences for the sufficiency of school places. The specification of the retention of the locally listed façade is too specific for a site allocation policy, as it is not clear on what evidence this is based (i.e. following a full assessment of the asset's significance and setting).
15. The requirement for a development brief for the proposed primary school site is also considered to be unnecessary, the need for which is not sufficiently evidenced, given that pre-application discussions are underway on the Primary School site. DfE is committed to bringing the site forward and there is an urgent need for the school places. The requirement for a development brief could seek to delay this and hinder the delivery.
16. Therefore, we propose that the school component of allocation IP048a be stripped out from the policy and included as a separate allocation within this wider area, for a Primary School only, noting that development management policies will guide the preparation of a planning application covering detailed matters. This will ensure that there is a positive planning policy framework for the planning application to come forward in the short term to ensure the much-needed school places are able to be delivered without delay. Any undue burdens to the delivery of the school would not represent a positively prepared policy approach and could therefore be considered unsound.

## **Forward Funding**

17. DfE loans to forward fund schools as part of large residential developments may be of interest, for example if viability becomes an issue. Please see the Developer Loans for Schools prospectus for more information.<sup>1</sup> Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.

## **Developer Contributions and Community Infrastructure Levy (CIL)**

18. One of the tests of soundness is that a Local Plan is 'effective', meaning the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments.
19. Local authorities have sometimes experienced challenges in funding schools via Section 106 planning obligations due to limitations on the pooling of developer contributions for the same item or type of infrastructure. However, the revised CIL Regulations remove this constraint, allowing unlimited pooling of developer contributions from planning obligations and the use of both Section 106 funding and CIL for the same item of infrastructure. The advantage of using Section 106 relative to CIL for funding schools is that it is clear and transparent to all stakeholders what value of contribution is being allocated by which development to which schools, thereby increasing certainty that developer contributions will be used to fund the new school places that are needed. DfE supports the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development, consistent with Regulation 122 of the CIL Regulations.
20. While DfE supports Policy CS17: Delivering Infrastructure, we request a minor amendment either to the policy or its supporting text, to clarify that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. An example of this would be the local authority's expansion of a secondary school to ensure that places are available in time to support development coming forward. This minor amendment would help to demonstrate that the plan is positively prepared and deliverable over its period.
21. DfE would be particularly interested in responding to any update to the Infrastructure Delivery Plan/Infrastructure Funding Statement, viability assessment or other evidence relevant to education which may be used to inform revisions to local planning policies or the CIL charging schedule. As such, please continue to engage with DfE and consult us on any relevant future consultations.

## **Conclusion**

22. Finally, I hope the above comments are helpful in finalising IBC's Local Plan, with specific regard to the provision of land and developer contributions for new schools.

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<sup>1</sup> Please see DLS prospectus here: <https://www.gov.uk/government/publications/developer-loans-for-schools-apply-for-a-loan>

23. Please notify DfE when the Local Plan is submitted for examination, the Inspector's report is published and the Local Plan is adopted.
24. Please do not hesitate to contact me if you have any queries regarding this response. DfE looks forward to continuing to work with IBC to develop a sound Local Plan which will aid in the delivery of new schools.

Yours faithfully,

**Phoebe Juggins MRTPI**  
Forward Planning Manager – South East

Web: [www.gov.uk/dfe](http://www.gov.uk/dfe)

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	<p><b>Core Strategy and Policies Development Plan Document (DPD) Review Final Draft;</b></p> <p><b>Site Allocations and Policies (incorporating IP-One Area action Plan) DPD Review Final Draft</b></p>
Please return this comments form to:	<p><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</p> <p><b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b></p>
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	<p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>

<b>PART A PERSONAL DETAILS</b>		
	1. Personal details	2. Agent's details (if applicable)
Title	Miss	
First name	Phoebe	
Last name	Juggins	
Job title ( <i>where relevant</i> )	Forward Planning Manager	
Organisation ( <i>where relevant</i> )	Department for Education	
Address ( <i>Please include post code</i> )	Sanctuary Buildings Great Smith Street London SW1P 3BT	
E-mail		
Telephone No.		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Department for Education
--	--------------------------

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Site Allocations DPD Policy IP048	<p>1. As IBC will be aware, DfE is progressing a centrally approved 2 FE Free School (Central Ipswich Free School) to assist in meeting this Primary School need within the Mint Quarter allocation IP048a. A specific site has been identified at Carr Street (former Co-op Department Store site) within this allocation to deliver this. Suffolk County Council ('SCC') as the authority with a statutory duty to provide sufficient school places, have a requirement for the Central Ipswich Free School based on the basic need from the town centre area. It is demonstrated that there is a shortfall of capacity across the two school planning areas (there are extremely limited places available at existing town centre schools), as well as need generated by new housing development in this area identified in the SADPD. Therefore, there is significant demand for this school. Currently, there are increasing pressures with town centre schools being oversubscribed, as well as bulge classes being required and primary school pupils having to travel out of their local area to go to school. The further housing growth identified through the DPDs will exacerbate existing issues and therefore it is critical that the school is able to be delivered.</p> <p>2. The site is located so as to best meet the needs arising from its catchment – in accordance with Policy DM24 part d. SCC undertook a site search exercise and identified no other suitable, available sites to meet this local need for primary school places.</p> <p>3. DfE met with IBC in early 2020 to engage in pre-application discussions, regarding more technical and design matters to progress the project. Further detailed work will be undertaken to respond to IBC's comments, and in due course further pre-application work will be undertaken in liaison with IBC in order to move towards submission of a planning application later this year. The school is required as soon as possible in order to meet existing need and to cope with the housing growth likely to be experienced in the town centre.</p> <p>4. There are some generic requirements in the overall allocation policy IP048 which are considered to cause potential conflict with the delivery of a Primary School expediently at the site. The requirement to develop residential uses at upper floors would not be necessarily wholly deliverable with a Primary School and therefore we would propose that the supporting text to the allocation makes clear that residential accommodation should only be provided where feasible and appropriate. The 'Development Principles' for Mint Quarter in the SADPD sets out that development should 'respect and enhance'</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p><i>setting of Listed and historic buildings'. This is not considered to wholly comply with the NPPF, specifically paragraph 197 which requires an assessment of the asset's significance (with regard to non-designated assets), and a balanced judgement to be made thereafter. Furthermore, NPPF paragraph 184 dictates that assets '<i>should be conserved in a manner appropriate to their significance</i>', which does not necessarily equate to 'enhancement' in every scenario. The terminology 'historic building' is also not robust or consistent with the NPPF. Therefore, we propose that the wording be amended to reflect the requirements in the NPPF, and the distinction between designated and non-designated assets.</i></p>
<b>Site Allocations DPD Policy SP2, allocation IP048a</b>	<p>5. SADPD Policy SP2 sets out the requirements for site allocations. Allocation IP048a includes the Primary School. DfE has concerns that the allocation wording is too restrictive and could potentially frustrate and delay the delivery of the school, which would have significant consequences for the sufficiency of school places. The specification of the retention of the locally listed façade is too specific for a site allocation policy, as it is not clear on what evidence this is based (i.e. following a full assessment of the asset's significance and setting).</p> <p>6. The requirement for a development brief for the proposed primary school site is also considered to be unnecessary, the need for which is not sufficiently evidenced, given that pre-application discussions are underway on the Primary School site. DfE is committed to bringing the site forward and there is an urgent need for the school places. The requirement for a development brief could seek to delay this and hinder the delivery.</p> <p>7. Therefore, we propose that the school component of allocation IP048a be stripped out from the policy and included as a separate allocation within this wider area, for a Primary School only, noting that development management policies will guide the preparation of a planning application covering detailed matters. This will ensure that there is a positive planning policy framework for the planning application to come forward in the short term to ensure the much-needed school places are able to be delivered without delay. Any undue burdens to the delivery of the school would not represent a positively prepared policy approach and could therefore be considered unsound.</p>
<b>Core Strategy DPD Policy CS17</b>	<p>8. While DfE supports Policy CS17: Delivering Infrastructure, we request a minor amendment either to the policy or its supporting text, to clarify that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth. An example of this would be the local authority's expansion of a secondary school to ensure that places are available in time to support development coming forward. This minor amendment would help to demonstrate that the plan is positively prepared and deliverable over its period.</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

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Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**E**



**Felicia Blake**

---

**From:** Michael Pingram  
**Sent:** 26 February 2020 14:12  
**To:** PlanningPolicy  
**Cc:** John Lawson  
**Subject:** Ipswich Borough Council 2019 Local Plan Final Draft Consultation - Representations submitted by LPP on behalf of ESNEFT - Ipswich Hospital Campus, Heath Road, Ipswich  
**Attachments:** ESNEFT Local Plan Final Draft Comments 26.02.20.pdf; LPP application form to LPA - 26-02-20.pdf

Dear Sirs,

Please find attached representations to the Ipswich Borough Council Local Plan Final Draft consultation, submitted by Lawson Planning Partnership Ltd, on behalf of our client East Suffolk and North Essex NHS Foundation Trust (ESNEFT).

A hard copy of this submission has been sent to the Council in today's post.

We trust that these representations will be taken into consideration in the preparation and drafting of the next stages of the Local Plan Review.

Should you have any queries, please do not hesitate to contact me on the details provided and I would be grateful if you could please confirm receipt of this email and attachments.

Kind regards,

Michael Pingram BA (Hons), MSc  
Planner  
Lawson Planning Partnership Ltd  
882 The Crescent  
Colchester Business Park  
Colchester  
CO4 9YQ

[www.lppartnership.co.uk](http://www.lppartnership.co.uk)



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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



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Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review – Final Draft</b>
<b>Please return this comments form to:</b>	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  <b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b>
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

#### **PART A PERSONAL DETAILS**

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	<b>See Agent's details</b>	<b>Mr</b>
<b>First name</b>		<b>Michael</b>
<b>Last name</b>		<b>Pingram</b>
<b>Job title (<i>where relevant</i>)</b>		<b>Planner</b>
<b>Organisation (<i>where relevant</i>)</b>		<b>Lawson Planning Partnership Ltd</b>
<b>Address (Please include post code)</b>		<b>882 The Crescent Colchester Business Park Colchester Essex CO4 9YQ</b>
<b>E-mail</b>		
<b>Telephone No.</b>		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Agent - Lawson Planning Partnership Ltd Client – East Suffolk and North Essex NHS Foundation Trust (ESNEFT)
--	--

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<b>Policy CS19</b>	Please see enclosed LPP letter dated 25 <sup>th</sup> February 2020
<b>Paragraph 8.229</b>	Please see enclosed LPP letter dated 25 <sup>th</sup> February 2020
<b>Paragraph 8.230</b>	Please see enclosed LPP letter dated 25 <sup>th</sup> February 2020
<b>Policy CS17</b>	Please see enclosed LPP letter dated 25 <sup>th</sup> February 2020
<b>Table 8B (Community Facilities)</b>	Please see enclosed LPP letter dated 25 <sup>th</sup> February 2020

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

#### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

#### **PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

Planning Policy Manager  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

Tel 01206 835150

Co. Reg. No. 5677777

25<sup>th</sup> February 2020

Dear Sirs

**Ipswich Local Plan Final Draft (January 2020) – Representations on behalf of East Suffolk and North Essex NHS Foundation Trust (ESNEFT) concerning Ipswich Hospital Campus, Heath Road, Ipswich**

On behalf of our client East Suffolk and North Essex NHS Foundation Trust (ESNEFT), we write to provide our representations on the final draft Local Plan for your consideration. These representations build on our previous submissions dated 25<sup>th</sup> July 2017 and 13<sup>th</sup> March 2019 concerning the Local Plan, 'Call for Sites consultation (June – July 2017)' and the Local Plan Review Preferred Options consultation (November 2018), submitted on behalf of Ipswich Hospital NHS Trust, which in 2017/18 merged with Colchester Hospital University NHS Trust to form ESNEFT.

**Summary**

In summary, the representations are based on the NPPF's soundness tests and seek recognition that it is a statutory function of ESNEFT to provide acute health care services, which goes beyond the remit of the Council as Local Planning Authority. The representations also seek acknowledgement of ESNEFT's most up to date position concerning the related development strategy for the Heath Road Hospital campus and a small but important number of policy revisions to reflect this situation is also requested for consistency. Finally, it is also requested that acute Inpatient and outpatient facilities are added to the list and definition of community facilities, concerning potential recipients of developer infrastructure contributions.

**Background**

Following the merger of the two hospital trusts, ESNEFT is undergoing a Sustainability Transformation Plan (STP) to determine how acute hospital healthcare provision will be provided at each location. In addition, as part of a national initiative promoted by NHS England, acute hospital trusts are required to provide early delivery of additional inpatient bed spaces, which for Ipswich will support growth and resilience across the local health economy.

As part of these processes, significant investment in healthcare facilities and services is and will be taking place, to meet the requirements of the existing and future catchment population brought about in part by planned new housing growth included in the Local Plan. The provision of a new Emergency Department and Urgent Treatment Centre, which gained planning permission in 2019, is a key example of such investment and is due

Managing Director:  
John Lawson, BA(Hons) MPhil MRTP1

Director  
James Lawson, BA(Hons) MA MRTP1

Technical Director:  
Georgina Brotherton, BSc(Hons) MSc MRTP1

Associate Directors:  
Sharon Lawson, BA(Hons) DipTP MRTP1

882 The Crescent, Colchester Business Park,  
Colchester, Essex, CO4 9YQ  
[www.lppartnership.co.uk](http://www.lppartnership.co.uk)





to be implemented in 2020/21. To help deliver the STP and associated level of development linked with acute healthcare provision, a planning policy basis is required to provide for a suitable level of flexibility and certainty within which the Trust may bring forward its investment and development plans through planning applications.

### **Key Planning Policy Issues & Revisions Sought**

With the above background and NPPF soundness tests in mind, our representations focus on the wording of final draft policies CS19: Provision of Health Services and CS17: Delivering Infrastructure, and the related supporting text.

#### **CS19: Provision of Health Services**

This policy provides the basis for determining planning applications for development at the Ipswich Hospital Campus on Heath Road. At present, the policy seeks to 'safeguard' the hospital site for health and ancillary uses and refers to the provision of a site-wide masterplan to accompany related planning applications. Whilst there is no objection to a masterplan approach which reflects ESNEFT's Intentions, the inclusion of the word 'safeguards' is unnecessarily restrictive and inflexible.

As a statutory health authority and acute service provider, ESNEFT requires further flexibility in how it plans and develops the Hospital site, which in addition to the range of health care and ancillary uses listed below, may also include non-health care provision, should land become surplus to health care requirements over the 15 year plan period. Again, to allow for further flexibility, the inclusion of 'other ancillary uses' should be added to the policy as suggested.

Therefore, it is considered that the Policy as currently drafted would not; enable sufficient flexibility to enable ESNEFT to realise its development requirements, reflect related legal or procedural requirements, or reflect the most appropriate strategy for the site. Therefore, as currently drafted these parts of the plan are contrary to the tests set out in paragraph 35 of the NPPF.

However, it is acknowledged that development proposals for the hospital site should be considered in the context of a masterplan and suitable transport and parking strategy, which ESNEFT is currently preparing.

Consequently, small but important revisions to Policy CS19 have been suggested, which would provide further flexibility by removing the overly restrictive safeguarding requirement and allowing for a wide range of health care and ancillary uses across the site. The revised policy wording also allows for potential and appropriate non-health care uses to come forward providing they would be consistent with ESNEFT's health care strategy and masterplan for the site as a whole.

#### **Policy CS19: Provision of Health Services**

**The Council supports the development of healthcare related facilities at the Heath Road Hospital Campus as Identified on the policies map. Related uses may include:**

- Further Inpatient and outpatient accommodation and facilities
- Staff accommodation;
- Residential care home;
- Intermediate facilities;
- Education and teaching centre;



- Therapies centre; and
- Other ancillary uses.

**Proposals for new and improved healthcare, ancillary facilities and other compatible development at Heath Road Hospital Campus will be supported providing they form part of the Hospital Trust's Estate Strategy for the provision of healthcare facilities, consistent with an overall site wide masterplan prepared by the Trust and associated Transport Strategy including suitable travel plan measures and parking provision.**

It is also requested that the last sentence of the supporting text within Paragraph 8.229 is deleted as it covers healthcare matters that go beyond the scope of the Local Planning Authority's remit. Additional sentences are requested to demonstrate examples of the other ancillary uses referred to above.

Requested revision to paragraph 8.229:

**The Heath Road Hospital is a strategic health facility serving Ipswich and the surrounding area. It is important that any rationalisation of uses there takes place in the context of a planned strategy for healthcare provision which itself takes account of the future growth of Ipswich and the Ipswich Strategic Planning Area. The policy allows for a range of healthcare and other compatible uses, including staff support services to assist with recruitment and retention. Additional ancillary uses may also include shared facilities to deliver a mutual benefit to other public sector organisations aligned with the one public estate agenda.**

The supporting text also needs to be amended to link any parking issues to those directly associated with proposed hospital activity related to specific developments, rather than any parking issues that may be occurring in the area generally.

Requested revision to paragraph 8.230:

**It is also essential that the travel implications of specific hospital related developments are fully considered and measures are put in place to encourage the use of sustainable modes where practicable by staff, outpatients, and visitors. In particular, measures should tackle parking issues in surrounding residential areas associated with proposed Hospital activity and the Hospital should put in place monitoring to ensure that any measures are proving to be effective.**

#### CS17: Delivering Infrastructure

This policy provides the basis for obtaining developer contributions towards essential infrastructure provision. It is noted that health and emergency services are again referred to, although there is no specific reference to acute hospital facilities. Therefore, for completeness, the following additions to the Policy and supporting text are requested.

Point 3 on page 98 – amend to read;

#### **3. health including acute care and emergency services.**

Bullet point 7 on page 98 – amend to read;

- community facilities including GP surgeries, health centres and key acute inpatient and outpatient facilities;



Page 203 – list of strategic infrastructure facilities. Under ‘Community facilities’ add the following to the description of facilities

**Improved acute and general healthcare provision at Heath Road Hospital**

We trust you will find our representations to be helpful as part of the local Plan review process and please contact us if you require further clarification.

Yours faithfully

-

**Lawson Planning Partnership Ltd**

**cc ESNEFT**



Mr Carlos Hone  
Operations Manager  
Planning and Development  
Ipswich Borough Council  
Planning Policy and Delivery Team  
Grafton House  
15-17 Russell Road  
Ipswich Suffolk  
IP1 2DE

Your ref:  
Our ref:  
Date: 2<sup>nd</sup> March 2020  
Please ask for: Andrea McMillan  
Customer Services: 03330 162 000  
Direct dial:  
Email:

Dear Mr Hone,

#### **Consultation on Ipswich Borough Local Plan Review Final Draft**

East Suffolk Council (The Council) would like to take the opportunity to express its support for the Ipswich Borough Council (IBC) Local Plan Review Final Draft, which comprises the Core Strategy and Policies Review Final Draft and the Site Allocations and Policies (incorporating IP-One Area Action Plan) Review Final Draft. The Council provided comments on the Ipswich Local Plan Review Preferred Options on the 12th March 2019.

The Ipswich Strategic Planning Area (ISPA) Board, of which the Council is a member, involves ongoing work between the member authorities of the ISPA Board in relation to addressing strategic cross boundary planning matters. The Council is committed to and supportive of this collaborative working, as demonstrated through the production of the Statement of Common Ground for the ISPA, which outlines the joint working undertaken and the outcomes in relation to planning for environmental, economic, housing and infrastructural matters. These matters have been taken forward through policies contained in the Suffolk Coastal Final Draft Local Plan, currently undergoing Examination, and policies ISPA1 – ISPA4 in the IBC Local Plan Review Final Draft are broadly similar. Policy SCLP2.1 Growth in the Ipswich Strategic Planning Area of the Suffolk Coastal Final Draft Local Plan (January 2019) seeks to support the continued role of Ipswich as the County Town.

As a reminder, it should be noted that from 1<sup>st</sup> April 2019 the new East Suffolk Council was created, and references to Suffolk Coastal District Council in the Ipswich Local Plan Final Draft should be updated accordingly.

The Council does not raise any issues in relation to the overall soundness of the Ipswich Local Plan, however, would wish to make comments in relation to parts of the Plan as set out below.

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**LEGAL ADDRESS** East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT  
DX: 41400 Woodbridge

**POSTAL ADDRESS** Riverside, 4 Canning Road, Lowestoft NR33 0EQ  
DX: 41220 Lowestoft

### **Policy ISPA2: Strategic Infrastructure Priorities**

The Council would like to highlight that the equivalent policy in the Suffolk Coastal Final Draft Local Plan (Policy SCLP2.2) includes reference to police, community safety and cohesion provision and green infrastructure and suitable alternative natural greenspace. It is suggested that policy ISPA2 should also include reference to these strategic infrastructure priorities. This would align the policy with the Statement of Common Ground between the ISPA authorities which specifically references police, community safety and cohesion provision and green infrastructure and suitable alternative natural greenspace (SANG) as other strategic infrastructure priorities. Ipswich Borough Council will be aware that, following publication of the Ipswich Local Plan Review Final Draft, there have been recent announcements relating to the ceasing of the Ipswich Northern Routes project.

### **Policy ISPA3: Cross-boundary mitigation of effects on Protected Habitats and Species**

The Council is supportive of the commitment to address the issue of recreational impact avoidance and mitigation through continued joint working. This policy reflects the equivalent policy within the Suffolk Coastal Final Draft Local Plan (Policy SCLP2.3 'Cross-boundary mitigation of effects on Protected Habitats') and is considered by the Council to be sound. The Council does however set out further related comments below in relation to Policy DM8: Natural Environment.

### **Policy ISPA4: Cross Boundary Working to Deliver Sites and Policy CS2: The Location and Nature of Development**

The Council is supportive of the general principles of these policies regarding the development of land at the northern end of Humber Doucy Lane. This approach is complementary of the Suffolk Coastal Final Draft Local Plan policy for Land at Humber Doucy Lane (Policy SCLP12.24), and along with other policies and site allocations in the Ipswich Local Plan Final Draft contributes towards the outcome outlined within the Statement of Common Ground of each local planning authority meeting housing needs within their own area. In particular, the Council supports the 30% affordable housing requirement of Policy ISPA4 which appropriately complements the affordable housing policy (SCLP5.10 'Affordable Housing on Residential Developments') in the Suffolk Coastal Final Draft Plan.

It is suggested that policy for development at the northern end of Humber Doucy Lane references the maintenance of separation between Ipswich and the surrounding settlements, for consistency with Policy DM11 'Countryside'. It is noted that Policy ISPA4 infers that SANGs will be required on both sides of the Borough boundary for the Humber Doucy Lane site. For clarity and to enable the provision for any SANG to be considered through the project level Habitats Regulations Assessment, and to be reflective of the plan level Habitats Regulations Assessment, it is considered that the Policy could provide an appropriate level of flexibility by not specifying that SANG be located on both sides of the Borough boundary.

Also, as a general point, reference to SANGs as Suitable Accessible Natural Greenspaces should be changed to Suitable Alternative Natural Greenspaces to reflect the meaning of the term SANGs.

#### **Policy CS10: Ipswich Garden Suburb**

The Council welcomes the protection of the physical separation between Ipswich and Westerfield village. Such protection accords with Policy SCLP10.5 'Settlement Coalescence' of the Suffolk Coastal Final Draft Local Plan relating to settlement coalescence which aims to prevent the development of land between settlements that leads to urbanising effects between settlements. Policy CS10 also facilitates a country park towards the north of the Ipswich Garden Suburb and the Suffolk Coastal Final Draft Local Plan carries forward the allocation of land in the north of Ipswich Garden Suburb as part of the country park (Policy SCLP12.23 'Land off Lower Road and Westerfield Road (Ipswich Garden Suburb Country Park)'). This approach is considered by the Council to be sound.

#### **Policy CS11: Gypsy and Traveller Accommodation**

The Council is supportive of the Ipswich Local Plan in seeking to identify land within the Borough boundary for permanent Gypsy and Traveller pitches to meet its identified need, and would support the Borough Council in looking to identify sites in the Borough to meet the need. The ISPA Statement of Common Ground states that each local planning authority will plan to meet its own need for permanent pitches for Gypsies and Travellers and should have a policy settling out how this will be delivered in its own area. The Statement of Common Ground goes on to state that where the capacity to accommodate pitches cannot be met within the local authority's boundary a comprehensive re-assessment of deliverability will be undertaken and the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.

The Council notes that the Policy includes a reference to developing a short stay site between Ipswich and Felixstowe. Whilst this approach was identified in the adopted IBC Core Strategy and Policies DPD (2017), the authorities across Suffolk are working together to deliver sites to meet the needs identified in the Accommodation Needs Assessment (this identified a need for two to three sites in the study area which covers the ISPA authorities plus the former Waveney part of East Suffolk). The policy should appropriately apply some flexibility in meeting needs for short stay stopping sites in order to be effective and consistent with the approach outlined in the Statement of Common Ground.

#### **Policy CS16: Green Infrastructure, Sport and Recreation**

The Council supports and welcomes the approach of working with partners in respect of the Recreational Avoidance and Mitigation Strategy and a new country park within the Ipswich Garden Suburb. Both of the aforementioned aspects of this policy are reflective of the joint work being undertaken between the Council and IBC. The Council also supports joint working with IBC and other neighbouring authorities to deliver strategic green infrastructure. In particular, the establishment of a green trail around Ipswich is reflected in Policy SCLP12.24 'Land at Humber Doucy Lane' in the Suffolk Coastal Final Draft Local Plan.

### **Policy CS17: Delivering Infrastructure and Policy CS20: Key Transport Proposals**

The Council is supportive of IBC's positive commitment to the delivery and funding of mitigation through a transport mitigation strategy as part of collaborative working through the ISPA Board. This is consistent with the ISPA Statement of Common Ground which sets out a commitment to produce a mitigation and funding strategy to mitigate the highways impacts of growth across the ISPA authorities. The potential measures outlined in Policy CS20 are consistent with the potential measures outlined in Suffolk County Council's Transport Mitigation Strategy.

The Council notes that a number of policies in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft would support the delivery of transport mitigation in the ISPA. Particularly, the Council notes the potential provision for park and ride facilities under site allocation IP152 Airport Farm Kennels and under policy SP9 Safeguarding Land for Transport Infrastructure, improvements to cycling and walking provision under policy SP15 and limiting congestion (along with supporting the economy) under Policy SP17 Town Centre Car Parking.

The categories of infrastructure detailed in Policy CS17 are broadly in line with the infrastructure commitments in Policy SCLP2.2 'Strategic Infrastructure Priorities' of the Suffolk Coastal Final Draft Local Plan. Where infrastructure projects require cross-boundary cooperation, they have been identified in the Annex of the ISPA Statement of Common Ground. These projects are appropriately identified in both the Infrastructure Delivery Framework of the Suffolk Coastal Final Draft Local Plan and Table 8A of the IBC Final Draft Plan.

The Council notes that Policy CS17 refers to infrastructure to be secured from new developments including early years provision. This is consistent with the Annex of the ISPA Statement of Common Ground which identifies the provision of early years provision in north east Ipswich. However, it is not clear in Table 8A of the plan whether early years provision in north east Ipswich has been identified as an infrastructure priority, consistent with the ISPA Statement of Common Ground. The Council has included as a criterion within Policy SCLP12.24 'Land at Humber Doucy Lane' of its Final Draft Local Plan provision of an early years setting on site, if needed. To be effective it is recommended that this is replicated in Policy ISPA4 of the Ipswich Local Plan Review Final Draft.

### **Policy DM3: Air Quality**

The Council notes IBC's air quality screening study, as part of the new evidence base documents for the IBC Local Plan Review. The air quality screening has considered growth across the ISPA and the Council would note that there are potential linkages with mitigation outlined to deliver modal shift through an ISPA transport mitigation strategy as outlined above.

### **Policy DM8: The Natural Environment**

The Council is supportive of this policy and the approach it takes. However, the equivalent policy within the Suffolk Coastal Final Draft Local Plan (Policy SCLP10.1 'Biodiversity and Geodiversity') refers to the Recreational Avoidance and Mitigation Strategy (RAMS), and as such provides a development management policy approach to implementing the strategy which has been worked

**up on a cross-boundary basis. In this respect, to be effective Policy DM8 could be strengthened through reference to securing contributions to facilitate the implementation of the strategy.**

**The Council would wish to be notified of progress of the Ipswich Local Plan Review Including the submission, the publication of the Inspector's report and the adoption of the Plan. We trust our comments above are helpful but please do not hesitate to contact us should you require any clarification on the points raised.**

**Yours Sincerely,**

**Andrea McMillan | Principal Planner  
East Suffolk Council**

This submission is confirmed

[26275]

### Object Policy CS1 Sustainable Development

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

We are pleased that paragraph 8.41 refers to UKCP18.

Paragraph 8.44 refers to buildings at risk of flooding through tidal surges and heavy rain. However, this paragraph does not specifically refer to fluvial flood risk. We therefore would require this to be updated accordingly.

Paragraph 8.45 refers to the SFRA. The SFRA is a living document and should be updated when new modelling becomes available.

**Changes to plan:** We are pleased that paragraph 8.41 refers to UKCP18. Paragraph 8.44 refers to buildings at risk of flooding through tidal surges and heavy rain. However, this paragraph does not specifically refer to fluvial flood risk. We therefore would require this to be updated accordingly. Paragraph 8.45 refers to the SFRA. The SFRA is a living document and should be updated when new modelling becomes available. Our main comments that need to be actioned relating to the SFRA can be found within our response to policy DM4 - Flood Risk.

**Representation at examination:** Written Representation

This submission is confirmed

[26276]

Support Policy CS11 Gypsy and Traveller Accommodation

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

We are pleased to see that paragraph 8.148 refers to caravans, mobile homes and park homes intended for residential use being classified as 'highly vulnerable' and therefore not compatible with Flood Zone 3 and require the exception test in Flood Zone 2.

Representation at examination: Written Representation

This submission is confirmed

[26277]

Support Policy CS16 Green Infrastructure, Sport and Recreation

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

We are satisfied that this paragraphs incorporates our previous comments in relation to Natural Flood Management.

Representation at examination: Written Representation

This submission is confirmed

[26278]

## Object Plan 2 Flood Risk

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

This plan includes a statement which says "This plan of nationally designated flood zones relates to fluvial flooding. Further information on pluvial (surface water) flooding can be found in the Strategic Flood Risk Assessment (SFRA)." This statement is incorrect as the plan shows both fluvial and tidal flooding. This will also need to be updated when the new modelling which will be within the living SFRA when completed.

**Changes to plan:** This plan includes a statement which says "This plan of nationally designated flood zones relates to fluvial flooding. Further information on pluvial (surface water) flooding can be found in the Strategic Flood Risk Assessment (SFRA)." This statement is incorrect as the plan shows both fluvial and tidal flooding. This will also need to be updated when the new modelling which will be within the living SFRA when completed. Our full comments on the SFRA can be found in our response to policy DM4 - Development and Flood Risk.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** Please see our response to policy DM4 - Development and Flood Risk.

This submission is confirmed

[26279]

## Object Policy DM4 Development and Flood Risk

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

At present, we are raising an unsound representation on Flood Risk grounds. This is because the evidence base that informs the Local Plan is not yet finalised. Further information can be found below.

**Changes to plan:** At present, we are raising an unsound representation on Flood Risk grounds. This is because the evidence base that informs the Local Plan is not yet finalised. The Strategic Flood Risk Assessment (SFRA) has not yet been agreed as the River Gipping fluvial model is not yet verified and ready for use. This is because we are still awaiting the final outputs and deliverables for this model. Therefore, there is not currently a reliable evidence base to derive the SFRA and inform the Local Plan. We have and will continue to work in partnership with Ipswich Borough Council on the SFRA. As soon as the modelling is completed we will be able to engage further to ensure that the SFRA is finalised and the Local Plan appropriately reflects its findings. A statement of common ground will be prepared if required. In addition to the above, we have included our comments below on the rest of the Local Plan document. These have been provided in the same format as the Local Plan itself. In terms of the rest of the policy itself: Paragraph 9.4.10 needs to make reference to the fact that the SFRA is a living document and is awaiting modelling information to update it. We fully agree with paragraph 9.4.12 which states that more and less vulnerable development in Flood Zones 2 and 3a may be acceptable but will require Flood Risk Assessments (FRAs) to demonstrate that such developments will be safe.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** The evidence base needs updating as referenced in our representation. We are working with Ipswich Borough Council on this and will be able to update further when the model review is completed.

This submission is confirmed

[26284]

### Object Chapter 1 - Introduction

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

Comments above are mainly pulled from our response to policy DM4 of the local plan. These have been reiterated here in the Introduction section to the site allocation document because our comments cannot be site specific until the SFRA and Gipping model are complete.

**Changes to plan:** Our full comments and what needs to be changed can be found above.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** Without a complete SFRA as a result of potential changes being needed as a result of the Gipping model that is being updated, we are unable to fully review the site allocations. As soon as this is complete - we will have a better idea as to what is required, if anything.

This submission is confirmed

[26274]

### Object Chapter 6 - Vision and Objectives

Respondent: Planning Ipswich [2281]

Received: 28/02/2020 via Web

Paragraph 6.16 states that the Strategic Flood Risk Assessment (SFRA) has been revised. However, this is currently being updated so this section should be amended. The Local Plan should also refer to the SFRA as being a living document.

**Changes to plan:** Paragraph 6.16 states that the Strategic Flood Risk Assessment (SFRA) has been revised. However, this is currently being updated so this section should be amended. The Local Plan should also refer to the SFRA as being a living document. Our full comments in relation to this can be found within our response to policy DM4 - Flood Risk. This is the main reason for our objection comment.

Document is not sound

Representation at examination: Written Representation

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**F**



26 February 2020

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

**Site Reference: iP307 Prince of Wales Drive**

Dear Sir/Madam,

We live next to the former Co-op site and wish to object to proposed redevelopment of land at Prince of Wales drive.

Whilst we agree the need for affordable housing, the proposed development will have an adverse effect on an area which is currently struggling to accommodate the number of vehicles parking in Chatsworth Crescent and Prince of Wales Drive.

This is compounded around school times when the roads are sometimes impassable.

Even though the former Co-op site with its 21 car park slots is currently used as an 'overflow' car park, not only for the local residents but also during the two periods of the 'school run', there is still not enough parking.

With the number of development properties suggested - 12 two storey houses and 6 flats in a three storey building and their allocated 22 car parking spaces, what effect will that have on the surrounding area?

Where are local residents, who currently use the former Co-op site, going to park ?

How bad will the congestion become during the 'school run' ?

Additionally, the inclusion of an apartment block 3 storeys high would be totally out of character with the surrounding structures and for those properties it backs on to would be a direct intrusion causing loss of privacy and overlooking.

Yours faithfully,

M.S. Forster

**Felicia Blake**

---

**From:** l  
**Sent:** 15 January 2020 10:16  
**To:** PlanningPolicy  
**Subject:** objection to plan ref IP307

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/Madam

I have received a flyer from the proposed developers of the old Co-op along Prince of Wales Drive and have just seen a Local plan site application notice on the 20MPH sign near my property.

I'm writing to you to let you know that if and when a planning application is submitted I am planning to object to the proposals.

Yours Sincerely

Terry Forster

**Felicia Blake**

---

**From:**   
**Sent:** 04 February 2020 00:34  
**To:** PlanningPolicy  
**Subject:** Objection letter ref IP307 Prince of Wales Drive  
**Attachments:** Council form IP307 dated 4.2.20.docx; Objection letter IP307 date 4.2.20.docx

Hi there

Please see attached my objection letter and form from Council website

Regards

Terry

<b>Consultation document(s) to which this comments form relates:</b>	<b>IP307 Prince of Wales Drive</b>
<b>Please return this comments form to:</b>	<b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b> <b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road ipswich IP1 2DE</b>
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

#### PART A PERSONAL DETAILS

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	Mr	
<b>First name</b>	Terry	
<b>Last name</b>	Forster	
<b>Job title (where relevant)</b>		
<b>Organisation (where relevant)</b>		
<b>Address (Please include post code)</b>		
<b>E-mail</b>	-----@-----.com	
<b>Telephone No.</b>		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

<b>Your name or organisation (<i>and client if you are an agent</i>):</b>	
---	--

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<b>Please see attached word document/letter</b>

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

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**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**     

**Adoption of the Ipswich Local Plan Review.**

**3.2.2020**

**Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE**

**OBJECTION to IP307 Prince of Wales Drive**

**18 two story dwellings and block of flats**

**Dear Mr/Mrs Case Officer**

**We live adjacent to the proposed development site and we are writing to ask that Ipswich Borough Council refuse this planning application from (Boyer, 15 De Grey Square, De grey Road, Colchester, Essex CO4 5YQ)**

**Herein are our comments and objections relating to this planning application:**

**1. Loss of privacy and overlooking**

**District Wide Local Plan, Policy states that new developments will be expected to provide a high standard of layout and design that ensures adequate privacy for the occupants of the building and of adjacent residential properties.**

**The end terrace will directly overlook our property; this will lead to a loss of privacy and will certainly impact on the peaceful enjoyment of our home and garden.**

**The proposed site of development is at such an angle that the primary amenity area of our garden, would be severely overlooked from the top rooms of the new development, resulting in a serious invasion of our privacy.**

**We believe that the proposed development is a direct contravention of the District Wide Local Plan. The design of the proposed development does not afford adequate privacy for the occupants of the building or of adjacent residential properties, particularly with regard to their right to the quiet enjoyment of garden amenities. We would urge you to consider the responsibilities of the council under the Human Rights Act in particular Protocol 1, Article 1 which states that: a person has the right to peaceful enjoyment of all their**

possessions which includes the home and other land. We believe that the proposed development would have a dominating impact on us and our right to the quiet enjoyment of our property. Article 8 of the Human Rights Act states that: a person has the substantive right to respect for their private and family life.

The building will be visually overbearing, as all we will see is a two-story brick wall. It is an inappropriate design for this part of the road. Such a terrace building would be totally out of keeping with the neighbouring properties, which are mainly semi-detached houses and single storey bungalows.

## **2, Protection of valuable open space**

**District Wide Local Plan, It is important that development of vacant urban land should not involve the loss of valuable open space. Furthermore, sensitive planning control is necessary to ensure that the cumulative effects of redevelopment do not damage the character and amenity of established residential areas.**

This is clearly an unacceptably high density and over development of an open site, especially as it involves loss of garden land and the open aspect of the neighbourhood. Lord Belstead in the 1960's wanted an open feel to the area, this new development will give us a feeling of being hemmed in.

## **3, Inadequate parking**

Prince of Wales Drive is already a busy road, especially during the school runs; this additional concentration of traffic will cause traffic problems and create a safety hazard for other motorists.

District local plans have guidelines for how many car parking spaces are needed for example a 3 bed house (2 spaces, with access to a further unassigned space nearby). Looking at the plan, there is not enough spaces and therefore residents will seek parking in Aberdare Close, along Prince of Wales and Chatsworth Crescent.

There have been several accidents and near misses along Prince of Wales Drive when we park along it, not to mention the chaos and arguments we have had when parents pick up and drop off the children on the school runs. At times it is a real battle just to get our cars off our drives. I've been informed that the Police have been called several times because of rising tensions. We have examples where residents have suffered stress because of this. The old Co-op car park is a buffer and is used by teachers from the School.

## **4, Detrimental impact upon residential amenities**

**District Wide Local Plan, Policy states Proposals for development should be of good design and respect the character of the surroundings. Also where it would demonstrably harm the character or appearance of an area or amenities enjoyed by local residents.**

The proposed development/visual impact of the development is out of character with the neighbourhood (we have a balance of bungalows and semi's) it is over-bearing, out-of-scale

or out of character in terms of its appearance compared with existing development in the vicinity.

The loss of existing views from neighbouring properties would adversely affect the residential amenity of neighbouring owners, a feeling of openness in and around the School area.

Building the properties so close to the bottom of our garden will have an adverse effect on the residential amenity of myself and neighbours because of additional noise, disturbance, overlooking, loss of current privacy, a feeling of overshadowing and loss of light.

## 5, Need to avoid Town cramming

The proposed dwellings would significantly alter the fabric of the area and amount to serious 'cramming' in what is an 'open area'. The site plans show very small rear gardens, and incredibly small, if any front gardens. This is totally out of character with the surrounding area. The proposal allows very little space for landscaping and we believe that it would lead to gross over-development of the site.

## 6, Non-compliance with Government guidance

Government Planning Policy States that: The Government is committed to protecting and enhancing the quality of the natural and historic environment, in both rural and urban areas. Planning policies should seek to protect and enhance the quality, character and amenity value of the countryside and urban areas as a whole. A high level of protection should be given to most valued townscapes and landscapes, wildlife habitats and natural resources.

Government Planning Policy States on Housing that: A good design should contribute positively to making places better for people. Design which is inappropriate in its context, or which fails to take the opportunities available for improving the character and quality of an area and the way it functions, should not be accepted. Local planners should encourage development that creates places, streets and spaces which meet the needs of people, are visually attractive, safe, accessible, functional, inclusive, have their own distinctive identity and maintain and improve local character.

We believe the proposal contravenes this guidance as it is to the detriment of the quality, character and amenity value of the area, as outlined in the points above.

We invite you to visit our home to verify that these objections are valid.

Therefore, we ask that Ipswich Borough Council refuse this Planning Application and encourage Boyer to resubmit a plan in another location that will be less intrusive on neighbouring properties, and more sensitive to the character of this area.

Should you require any additional information, clarification of any comments made, or would like to arrange a visit to our home; please do not hesitate to contact us on

Yours Sincerely,  
Terry Forster

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**G**



# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	Policies Map Ipswich Planning and Development Ipswich Borough Council
Please return this comments form to:	<u>planningpolicy@ipswich.gov.uk</u> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	Part A – Personal details  Part B – Your comment(s).

#### PART A PERSONAL DETAILS

	1. Personal details	2. Agent's details (if applicable)
Title	Caroline Markham Mrs	
First name	Caroline	
Last name	Markham	
Job title (where relevant)		
Organisation (where relevant)	Geo Suffolk	
Address (Please include post code)	1 ...	
E-mail	< ... >	
Telephone No.		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation (and client if you are an agent):

GeoSuffolk

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Policies Map Keyone area Inset	The key is out of date County Geological Sites and Regionally Important Geological Sites are ALL <u>called County Geological Sites now.</u>
	<del>WWS</del> The five locations of GGS are correct - only the key is wrong

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

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**Adoption of the Ipswich Local Plan Review.**

**PRIVACY NOTICE**

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As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 26<sup>th</sup> February 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England)  
Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website: [www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which  
this comments form relates:

Ipswich Plan Consultation

Failed to assess the needs and concerns relating to the  
safeness of the Fonnerau Way

We wish to make a representation seeking a  
modification to the plan or part of the plan as the  
current option thru broad acres farm is unsound.

Please return this comments form  
to:

[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk) or

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

Return by:

11.45pm Wednesday 26<sup>th</sup> February 2020

Part A – Personal details

Part B – Your comment(s).

**PART A PERSONAL DETAILS**

Title	1. Personal details	2. Agent's details (if applicable)
First name	MR	
Last name	PAUL	
Job title (where relevant)	GILBERT	
Organisation (where relevant)	Retired	
Address (Please include post code)	NFT	

<b>PART B</b> Comment(s) about the Ipswich Local Plan Final Draft Consultation	
Your name or organisation (and client if you are an agent):	none

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Fonnerau way.	<p>Both my wife and I would like to express our concerns to the planners and council during this final consultation period as the need for a safer pedestrian way and cycle track other than Broad acres Farm entrance on Lower Rd in Westerfield. Northern end of Fonnerau way.</p> <p>The council has failed to assess the needs as the current foot path access is definitely unsuitable for a cycle track we can vouch for that, as when we walked this route once we had to negotiate 2 moving cars and a horse being moved which made us scared. We understand this is someone's home and they have the right to move their horse, but there is no value enjoyment or country feel about being in the country walking through someone's home, whereas the rest of the Fonnerau way does not go through someone's home and runs along side beautiful fields where wildlife and be seen.</p> <p>We saw the plans in Ipswich recently and were told that a new pedestrian way and cycle track would be opening up on Lower Road, avoiding Broad acres Farm, thus leading directly into the park area. What could be better and safer I ask myself as this would be our preferred option and I am sure many others would agree with us.</p> <p><b>Conclusion:</b> The plan must be altered as to show the new safer route as we want safety first please after all Ips council has a duty to ensure users of these routes are safe.</p>

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final  
Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Wednesday 26<sup>th</sup> February 2020.

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**Adoption of the Ipswich Local Plan Review.**

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**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

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**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Ipswich Local Plan Review – Submission version and associated evidence base.</b>
<b>Please return this comments form to:</b>	<b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b>  <b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b>
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
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<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	Mr	
<b>First name</b>	John	
<b>Last name</b>	Fleming	
<b>Job title (where relevant)</b>	Policy Planner	
<b>Organisation (where relevant)</b>	Gladman Developments	
<b>Address (Please include post code)</b>	Gladman House, Alexandria Way, Congleton, Cheshire, CW12 1LB	
<b>E-mail</b>		
<b>Telephone No.</b>		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Gladman Developments
--	----------------------

Please specify which document(s) and document part you are commenting upon.

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Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Local Plan – Submission version	<p>Please see attached representations. Gladman would also like to request to participate at the hearing sessions at the Examination in Public to discuss the issues raised.</p>

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

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**Ipswich**  
**Local Plan Review**  
**Publication Draft Plan**



**February 2020**

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### Appendices

Appendix 1: Orwell Green Framework Plan

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## 1 INTRODUCTION

### 1.1 Context

- 1.1.1 These representations are submitted by Gladman in response to the Ipswich Local Plan Review (ILPR) Publication Draft consultation.
- 1.1.2 Gladman has considerable experience in the development industry across a number of sectors including residential and employment development. From that experience, we understand the need for the planning system to ensure that residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic development.
- 1.1.3 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure. Gladman also has a wealth of experience in contributing to the development plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of that experience that the comments are made in these representations.
- 1.1.4 Through this submission, Gladman have highlighted areas where the Local Plan's policies require further clarity or justification in order to be found sound at Examination, namely the need for an effective approach to cross boundary strategic issues. As such, Gladman formally request that we are afforded the opportunity to discuss the issues raised at the Local Plan examination public hearing sessions.

### 1.2 Structure of representations

- 1.2.1 These representations are structured to follow the consultation document where possible and will cover the following key topic areas:
- National Planning Policy and Guidance
  - Legal Compliance – Duty to Cooperate and Sustainability Appraisal
  - Housing delivery and detailed policies
- 1.2.2 In addition, Gladman have provided details of two strategic sites that we are promoting to the neighbouring districts of Babergh and East Suffolk within Section 6 below. Both sites are ideally located to assist Ipswich Borough in meeting its development needs over the plan period through joint working with its neighbouring districts under the Duty to Cooperate.

## 1.3 Plan Making

1.3.1 The NPPF19 sets out the four tests which a Local Plan must meet to be considered sound:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

## 1.4 Overview of Soundness

1.4.1 Given that this is the Publication Draft of the ILPR it is of critical importance to consider these tests and whether the proposed policies and allocations would be meeting these at the point that the plan is examined. Due to the issues raised through this submission and summarised in Table 1 below, Gladman consider it necessary that we are given the opportunity to discuss our representations further at the Examination in Public in due course.

Policy	Sound / Unsound / Comment	Test of Soundness	Reason
Policy CS2 – Location of development	Unsound	Justified, effective, positively prepared and consistent with national policy	This policy fails to fully reflect and address the wider strategic priorities. The Local Plan strategy must be revised so that it addresses unmet housing needs arising from the Borough.
Policy CS7 – Housing requirement	Unsound	Justified, effective, positively prepared and consistent with national policy	The policy fails to succinctly set out how the LPAs within the ISPA will ensure housing needs will be met in full over the plan period. The stepped trajectory is not soundly based as it will delay the delivery of housing needs.
Policy CS10 – Ipswich Garden suburb	Comment	Justified, effective, positively prepared and consistent with national policy	The Council and its neighbouring authorities have failed to consider alternative sustainable growth opportunities to meet unmet housing needs over the plan period.
Policy CS12 – Affordable housing	Unsound	Justified, effective, positively prepared	The level of affordable housing to be delivered by this policy will fail to meet the affordable housing needs of the Borough.

		<b>and consistent with national policy</b>	
<b>Policy CS13 – Economic development</b>	Unsound	<b>Justified, effective, positively prepared and consistent with national policy</b>	<b>The Local Plan needs to promote a strategy which encourages economic development.</b>

Table 1

## 2 NATIONAL PLANNING POLICY

### 2.1 Revised National Planning Policy Framework

- 2.1.1 On 24<sup>th</sup> July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework (NPPF18). This publication formed the first revision of the Framework since 2012 and implemented changes informed by the housing white paper (2017)<sup>1</sup>, the 'Planning for the right homes in the right places' consultation (2017) and the draft NPPF (2018) consultation.
- 2.1.2 The 2018 version of the NPPF was itself superseded on 19<sup>th</sup> February 2019, with the latest version amending policy regarding Appropriate Assessment, as well as other minor clarifications to wording. These representations have been prepared on the basis of the revised NPPF (NPPF19) and unless otherwise stated any NPPF references are in relation to the 2019 version of the national policy.
- 2.1.3 The revised Framework introduces a number of major changes to national policy. The changes reaffirm the Government's commitment to ensuring up-to-date plans are in place which provides a positive vision for the areas they cover. These should outline the housing, economic, social and environmental priorities to help shape future local communities. In particular, paragraph 16 of the NPPF states that Plans should:
- "be prepared with the objective of contributing to the achievement of sustainable development;
- be prepared positively, in a way that is aspirational but deliverable;
- be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- be accessible through the use of digital tools to assist public involvement and policy presentation; and

<sup>1</sup> Department for Communities and Local Government. (2017). 'Fixing our broken housing market'. Available at: <https://www.gov.uk/government/publications/fixing-our-broken-housing-market/>.

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**serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."**

- 2.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can come forward where it is needed and that the needs of groups with specific housing requirements are addressed and land with permission is developed without unnecessary delay.
- 2.1.5 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. It states:

**"Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:**

- a) **specific, deliverable sites for years one to five of the plan period; and**
- b) **specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."**

- 2.1.6 Once a local planning authority has identified its housing needs, these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and AONB and giving consideration as to where or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, resulting in net gains across all three. Adverse impacts on any of these dimensions should be avoided but where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered.

## **2.2 Planning Practice Guidance**

- 2.2.1 The Planning Practice Guidance (PPG) provides additional guidance to be read alongside the NPPF. Numerous updates have been made to the PPG in September 2018 to reflect the changes in approach

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brought through the revised NPPF. Further changes have been made to the PPG throughout 2019.  
Relevant references from the guidance contained in the PPG are made within this submission.

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## 3 LEGAL REQUIREMENTS

### 3.1 Sustainability Appraisal

- 3.1.1 In accordance with Section 19 of the Planning and Compulsory Purchase 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 3.1.2 The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the ILPR proposals on sustainable development when judged against all reasonable alternatives. The Council must ensure that the future results of the SA clearly justify its policy choices. In meeting development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. This must be undertaken through a comparative and equal assessment of all reasonable alternatives, in the same level of detail for both chosen and rejected alternatives. The Council's decision making, and scoring should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often the SA process flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.
- 3.1.3 In accordance with the SEA Regulations, the Council must take account of all reasonable alternatives when assessing and selecting their preferred policy choice. It is integral to this process that each reasonable alternative is assessed to the same degree of detail as the authority's preferred option and should only be rejected after a fair and comparable assessment of its sustainability credential.

### 3.2 Duty to Cooperate

- 3.2.1 The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.
- 3.2.2 The NPPF (2018) had introduced a number of significant changes on how local planning authorities are expected to cooperate, including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The NPPF (2019) sets out that local planning authorities should produce, maintain and update

one or more SoCG throughout the plan making process. The SoCG should provide a written record of the progress made by the strategic plan making authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the lengths local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with i.e. unmet housing needs.

- 3.2.3 As demonstrated through the outcome of the St Albans Local Plan examination, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This legal test cannot be rectified through modifications.
- 3.2.4 Gladman recognise that the DtC is a process of ongoing engagement and collaboration as set out in the PPG It is clear that the Duty is intended to produce effective policies on cross boundary strategic matters. In this regard, the Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint work arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation to ensure that the borough's housing needs are met in full.
- 3.2.5 Any issues of unmet housing need arising from relevant neighbouring local authorities must be fully considered through the preparation of the Local Plan, working under the auspices of the DtC and agreements and evidenced through SoCG. To achieve this, it is vital that this matter is carefully explored through joint working with all other local planning authorities within the HMA, together with any other relevant local authorities that the HMA has a clear functional relationship with. Where necessary, a strong policy mechanism will be required within the Local Plan to demonstrate that unmet housing needs arising from relevant neighbouring authorities and those with a clear functional relationship will be met during the plan period.
- 3.2.6 In light of the above it is noted that the starting point in the wider strategic planning area (covering East Suffolk, Mid Suffolk District Council and Babergh District) is for local authorities to meet their own housing needs within their own boundary. However, the ability of Ipswich Borough to meet its development needs in full over the plan period requires the commitment of neighbouring authorities to assist in meeting its housing needs due to the nature of the administrative boundary.
- 3.2.7 It is recognised that the local authorities of Babergh, Mid Suffolk, Suffolk Coastal, Ipswich and Suffolk County signed a MoU in June 2016, which sought to ensure an approach whereby strategic local planning policy becomes consistent across the local authority areas. The proposed approach formed a useful starting point in ensuring that strategic priorities across the local authority boundaries can be properly coordinated and clearly reflected in a joint Local Plan or through aligned Local Plans. Gladman recognise that collaborative work has been undertaken between the Council and its

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neighbouring authorities during the plan making process. A series of MoUs and SoCGs have been published during the course of plan's preparation. Paragraphs 25 and 26 of the Framework state that:

**"25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans..."**

**26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs cannot be met wholly within a particular plan area could be met elsewhere."**

- 3.2.8 This element of national policy is pertinent to the production of local plans across the area that is covered by the Ipswich Strategic Planning Board because they embrace shared growth and infrastructure delivery ambitions and priorities for the 'Wider Strategic Planning Area'. Having identified shared strategic matters, there is a need to address these through individual local plans in partnership. It therefore follows that strategic priorities must be fully embraced and supported through the spatial strategies of the local plans that are brought forward by individual authorities and through the associated decision-making processes that inform the Plan's preferred spatial development options. In its current form, the ILPR fails to achieve this because it does not form a strategy that will provide the necessary certainty that is needed to ensure that the minimum housing requirement across the Ipswich Housing Market Area can be achieved in full over the plan period. From the outset of the plan making process, the local authorities within the IPSA have been aware of the issue relating to the unmet needs arising from Ipswich over the plan period. Whilst it is unfortunate that the timescales for the production of the ILPR have fallen behind that of neighbouring authorities, the issue of unmet housing needs arising from Ipswich will still need to be considered at the Local Plan Examination. The need to address this issue goes to the heart of soundness of the Plan and its effects on the wider IPSA. Indeed, there are practical and sustainable options available to be considered in neighbouring authorities that can accommodate housing needs over the plan period in a sustainable manner, which can support wider infrastructure improvements, including at key junctions on the A14 which is an important cross boundary issue.
- 3.2.9 Whilst collaboration between the IPSA authorities has occurred it has not resulted in effective and concrete outcomes to ensure the housing needs of the HMA will be delivered in full. This issue will be explored in greater detail in section 4 of these representations.

## 4 IPSWICH LOCAL PLAN REVIEW

### 4.1 Context

- 4.1.1 This section is in response to the ILPR consultation document and its supporting evidence base. Gladman highlight below concerns and set out where we feel modifications will need to be made for the plan to be found sound.

### 4.2 Policy CS1: Sustainable Development

- 4.2.1 In principle, Gladman are supportive of the direction taken in Policy CS1, which sets out that decisions will be made in accordance with the presumption in favour of sustainable development and affirms the Council's commitment to making local planning decisions based on the delivery of sustainable development. The inclusion of such a policy provides assurance of a local approach to planning that will actively seek to improve the social, environmental and the economic wellbeing of the area by ensuring that development demonstrably contributes to the delivery of sustainable development within the Borough.
- 4.2.2 Notwithstanding this, Gladman believe that the policy should go further in its approach to ensuring the delivery of sustainable development is consistent with a localised approach to assessing development proposals in line with the ethos of achieving the delivery of sustainable development as required by the NPPF2019 which is key to assessing planning proposals and should be reflected in the policy wording linked to the vision and objectives of the Plan. In this regard, Gladman refer to the Sustainable Development Statement contained in the draft Durham Local Plan currently subject to examination. This is an effective example of a local approach of how development proposals will be considered against the presumption outlined in national policy. It is recommended that similar criteria that are relevant to Ipswich be included in the policy wording to demonstrate how a localised approach will be taken through the development management process.

### 4.3 Policy CS2: The Location and Nature of Development

- 4.3.1 Policy CS2 sets out the Council's approach to regeneration and the sustainable growth of Ipswich will be achieved by a variety of measures. These include, but are not limited to, regeneration areas, the allocation of sites at the northern end of Humber Doucy Lane phased in alignment with the delivery of the Ipswich Garden Suburb subject to the provision of suitable infrastructure. In addition, it is noted that Policy CS2 requires the local planning authority to work with neighbouring authorities to address housing need and delivery within the Ipswich housing market area.

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- 4.3.2 In principle, Gladman approve of the recognition within Policy CS2 for the Council to work with neighbouring authorities to address housing need and delivery within the Ipswich HMA. However, it is concerning that the Plan fails to provide a positive and effective mechanism to ensure the delivery of the HMA's housing needs in full. Indeed, this issue was recently highlighted in the Inspector's Post Hearing letter to the Suffolk Coastal Local Plan which specifically states that the Plan should be amended to include an immediate review of the Plan or relevant strategic policies, which would be triggered at the point where it is established through the adoption of a development plan that there are unmet needs arising in a neighbouring authority area in the HMA.
- 4.3.3 It is considered that the proposed approach as submitted risks the deliverability of the Plan through the stepped housing trajectory and the reliance on a Sustainable Urban Extension to north Ipswich which is heavily reliant on the provision of new and improved infrastructure. These issues are discussed in detail in section 4.4 below.

## 4.4 Policy CS7: The Amount of New Housing Required

### Background

- 4.4.1 Policy CS7 of the adopted Ipswich Core Strategy sets out an interim housing target of 9,777 dwellings over the period 2011-2031 i.e. 489dpa. At the time of the adoption of the Core Strategy and Site Allocations DPD, the Council was unable to demonstrate a five year housing land supply in the context of paragraph 47 of the NPPF 2012. Due to the constrained nature of the borough's administrative boundary the Council was required to review its Local Plan in order to review objectively assessed needs for housing, employment land and new retail floorspace in the short term working in partnership with neighbouring authorities under the auspices of the Duty to Cooperate to ensure the HMA's housing needs are met in full over the plan period.

### Housing Requirement

- 4.4.2 Policy CS7 of the emerging Local Plan seeks to deliver a housing requirement of at least 8,010 dwellings over the period 2018 to 2036. This equates to an annual average of at least 445 dwellings per annum a figure which is significantly less than the adopted Core Strategy housing requirement. However, the housing target is significantly reliant on the Ipswich Garden Suburb and Ipswich One area which allocates land for approximately 3,500 dwellings.
- 4.4.3 The housing figure contained in the emerging ILPR is derived from the Government's Standard Method. However, the PPG is clear that the need figure generated by the standard method should only be considered as the minimum starting point in establishing a housing requirement figure as it does not take into consideration matters which will influence demographic behaviour such as

economic growth strategies, affordable housing needs, strategic level infrastructure etc. which are likely to increase housing needs.

**4.4.4** The supporting text to this policy states at paragraph 8.106 that the Council does not consider that it should plan for a higher level of housing need than the standard method suggests. However, the adopted Core Strategy and the options considered as part of the SA demonstrate the Council could plan for a higher level of housing need than the standard method suggests. In addition, we would question how the proposed housing requirement has been aligned with the Council's economic growth agenda given that the Plan's vision and objectives seek to boost economic diversity across the Borough.

#### Stepped Trajectory

**4.4.5** The Council is seeking to 'step' the annual housing requirement as follows:

- From April 2018 – March 2024 – 300dpa (i.e. 1,800 dwellings)
- From April 2024 – March 2036 – 518dpa (i.e. 6,216 dwellings)

**4.4.6** The PPG<sup>2</sup> is clear that a stepped housing requirement may only be appropriate where there is a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period.

**4.4.7** Although the Council state that Ipswich Garden Suburb will deliver later in the plan period the PPG further states that that policy-makers should set out evidence to support a stepped approach and are not seeking to unnecessarily delay meeting identified development needs. With that being said, Ipswich has a historic under-delivery of housing against the adopted Core Strategy housing requirement of 489dpa, as detailed in table 2 below:

Year	Housing Completions	Affordable Housing Completions	Housing Completions within IP- One area
2011/12	283	152	51
2012/13	100	7	13
2013/14	228	44	117
2014/15	470	202	318
2015/16	496	133	237
2016/17	256	4	109

<sup>2</sup> Planning Practice Guidance Paragraph: 021 Reference ID: 68-021-20190722

2017/18	141	20	71
Total	1974	562	916

**Table 2 – Housing Delivery Record In Ipswich. Source: Annual Monitoring Report 13 2017/18 June 2019**

- 4.4.8 Measured against the adopted Core Strategy requirement of 489dpa, only in the 2015/16 monitoring year has that target been achieved. The IP-One area has delivered 46% of the homes in the Borough since 2011, some way off the 74% that the Council is relying on for the remainder of the Plan period. Even set against the lower emerging housing need of 445dpa, the Council's historic delivery does not suggest that the Borough's housing need will be delivered as they are relying on historic sites with known issues as a continuation of the existing spatial strategy. The Council's delivery record should have very clearly pointed the Council towards actively pursuing an alternative strategy to what is now being proposed and through the agreement to export housing needs to neighbouring areas in line with the requirements of national policy and guidance. Based on the Council's previous housing delivery, the Council needs to constructively work with its neighbours through their respective plan making process to ensure that housing needs (including affordable needs) of Ipswich can be met in full without unnecessary delay.
- 4.4.9 Furthermore, the historic completions data suggests that the Council's proposed stepped housing requirement will continue to delay meeting identified housing needs of the borough and therefore conflicts with the advice detailed in the PPG. Furthermore, a continued reliance on the IP-One area to deliver homes in Ipswich is unfounded and unrealistic and further distribution across the HMA is required.
- 4.4.10 Gladman note paragraph 8.151 of the ILPR that the Ipswich SHMA 2017 Part 2 Report identifies the total annual affordable housing need in Ipswich is 239 households per year, which represents 47.9% of the annual projected household growth in the Borough between 2014 and 2036 identified through the SHMA and around 50% of the need identified using the standard method. Through Policy CS12 the Council is seeking to secure 30% affordable housing on the new Garden Suburb and 15% in all other locations. The Council's housing requirement will therefore fail to meet the affordable housing needs of the borough. Gladman recommend that the stepped trajectory is deleted as it unnecessarily delays housing delivery, including affordable housing delivery.

## 4.5 Policy CS8: Housing Type and Tenure

- 4.5.1 In principle, Gladman support Policy CS8 as currently proposed which seeks to ensure an appropriate mix of homes by size and type is provided in accordance with the SHMA or any up to date evidence of local needs supported by the Council and the policies of the plan.

- 4.5.2 Notwithstanding this, it is noted that the Council will support the provision of Self-build/Custom build homes and on major applications will consider the currently applicable self-build register and whether provision should be included within the development proposal. This element of the policy lacks clarity on whether self-build plots should be provided on site. The Council's Self Build Register identifies 70 interested persons which does not indicate a strong demand for this form of housing.
- 4.5.3 Whilst it supported that the Council should be seeking to encourage the delivery of this form of housing, it is recommended that this element of the policy is modified so it is at the discretion of the developer to provide self-build homes on site. Indeed, Gladman would not be supportive of an approach which requires all development to provide Self-build homes as there are difficulties in terms of potential health and safety concerns and also the practical difficulties in terms of aligning their development with construction activity on the site.

#### **4.6 Policy CS10: Ipswich Garden Suburb**

- 4.6.1 Gladman notes the Council's continued approach to shape the delivery of the Ipswich Garden Suburb. In principle, Gladman has no objections to the allocation of a new settlement as outlined in the proposed policy wording. However, it is essential that the Council has considered all options available for development and it is essential that realistic delivery assumptions have been applied to the sites delivery. This issue is considered in more detail in section 5 of these representations.

#### **4.7 Policy CS12: Affordable Housing**

- 4.7.1 Gladman note the intention of this policy is to ensure a choice of homes is available to meet identified affordable housing needs in Ipswich. However, the Council's approach as currently proposed is not effective given the level of affordable housing needs within Ipswich will not be met over the plan period.
- 4.7.2 Gladman consider that the Council will need to proactively address this situation if it is to meet the housing market areas full housing needs. Indeed, paragraph 60 of the Framework is clear that in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. As such, it is essential that the Council allocate additional housing land to make a meaningful contribution to the Council's housing land supply and to boost affordable housing delivery. Gladman reiterate that this is an issue that will need to be informed through continued cross-boundary working with neighbouring authorities as this issue can be addressed through the allocation of sites within the vicinity of Ipswich within neighbouring districts such as the Orwell Green Garden Village.

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## **4.8 Policy CS13: Planning for Jobs Growth**

- 4.8.1 Policy CS13 seeks to promote sustainable economic growth in the Ipswich Strategy Planning Area. It is noted that the Council has updated its economic evidence as a result of the more recent East England Forecasting Model (EEFM) dataset being published. This has reduced the jobs growth from 15,580 jobs to 9,500 jobs over the plan period. Gladman consider the Plan should be aspirational and should be seeking to increase jobs growth as identified in the preferred options plan as a minimum in order to meet the visions and objectives of the Plan to increase economic activity and access to employment.

## **4.9 Policy DM4: Development and Flood Risk**

- 4.9.1 Gladman note the Council's proposed approach to flood risk management that is set out through Policy DM4. Gladman remain concerned that the Plan is relying on the delivery of housing from a number of sites in high risk flood zones. The Council suggests that it has undertaken sequential and exception tests as required by the NPPF, but in accepting the needs of Ipswich will at least in part need to be met outside of the Town's constrained boundary, the Council should look to identify additional sites outside of its boundary in collaboration with neighbouring authorities that are more suitable for residential development than those that are at high risk of flooding within its boundary.

## 5 GENERAL MATTERS

### 5.1 Housing Delivery

- 5.1.1 Gladman note the intention to allocate these sites within the Local Plan for residential use and associated community infrastructure over the plan period. As evidence through the Report prepared by Planning Prospects on behalf of Gladman<sup>5</sup>, there are fundamental concerns regarding the ability of these sites to viably deliver residential development over the plan period and over whether there is a demand for the type of homes that these sites can offer.
- 5.1.2 Due to the constrained nature of the borough boundary, the Council recognises that it has limited capacity for future development and will need to look beyond its administrative boundaries working in collaboration with neighbouring authorities to ensure housing needs are delivered in full.

#### Housing Land Supply

- 5.1.3 Whilst Gladman welcome the decision to include a 10% contingency within the Council's housing land supply, it is not evident from the evidence provided in the Housing Topic Paper as to which sites within the Council's housing land supply will come forward within the next five years following the adoption of the Local Plan and whether these sites are subject to extant permissions or proposed allocations. Neither the Council's SHLAA nor the Housing Topic Paper provide the necessary detail as required by the NPPF 2019. As such, Gladman reserve the right to provide comments on this matter should additional evidence be provided.

#### Housing Delivery Strategy

- 5.1.4 In addition to the Ipswich Garden Suburbs, Policy SP2 of the Site Allocations Review provides site allocations that the Council anticipates will deliver 2,750 homes in the Plan period, a reduction from 3,297 homes that were set out in the same policy in the Preferred Options Development Plan Review Documents published in November 2018. In addition, Policy SP3 highlights land with 'Land with planning permission or awaiting a Section 106 Agreement'. It is noted that should the permissions fail to be issued or implemented and lapse during the plan period or the development fail to come forward or be completed in accordance with the permission, the Council will protect the sites for residential use or residential-led mixed use. Sites included within Policy SP3 account for 1,470 dwellings over the plan period.

<sup>5</sup> See Gladman's representations to the Regulation 18 consultation – Appendix 1

- 5.1.5** Planning Prospects were instructed by Gladman to produce an assessment of the deliverability of residential sites put forward for allocation by Ipswich Borough Council in their Preferred Options Development Plan Review Documents published for consultation in November 2018.
- 5.1.6** Planning Prospects' analysis of the Council's suggested SP2 sites shows that there are many sites that cannot be relied upon to deliver homes over the emerging Plan period. For example, a number of the SP2 sites are unavailable and require existing occupiers to relocate and others are heavily constrained by designated heritage assets and areas of archaeological importance. These are significant constraints that impact the delivery of homes from these sites in principle.
- 5.1.7** Appendix 1 Planning Prospects' report details proformas for allocated sites within SP2 discussing deliverability and viability, before Appendix 2 provides a table detailing Site Indicative Deliverability Comparison between the Council's proposed figures and Planning Prospects' analysis. In March 2019 when this report was conducted it was evident that the sites were ineffectively assessed often assuming complete site coverage or very high densities without considering the amount of land required to avoid constraint impacts. Furthermore, the Council is relying on delivery from a number of sites in high flood risk zones which have significant viability and deliverability concerns.
- 5.1.8** Gladman contend that Ipswich Borough Council must look outside of the Borough's boundary to enable the town's housing need to be met and identify land outside of its boundary that are more suitable for residential development.
- 5.1.9** The notion that the housing strategy set out in the emerging Local Plan Review cannot be relied upon is exacerbated by the fact that a number of sites have been removed from Policy SP2 since the Preferred Options document published in 2018.
- 5.1.10** The sites listed in table 3 below were included within SP2 in the Preferred Options document but now have been removed or are no longer available for residential development.

Site Reference	Number of Dwellings	Planning Prospects Analysis	Current Status
IPO28a	11	Previous approved schemes have not been delivered. A large area of the site is in Flood Zones 2 and 3 (highest risk). There is no evidence to assume that an 11 unit proposal is viable and residential development is unsuitable in Flood Zones 2 and 3.	Not included in the latest version of the plan
IPO29	45	For this reason, the proportion of the site considered developable has been reduced	No longer included in the plan as available for

		from the 2017 Local Plan. A small area is at high risk of surface water flooding. The site also has potential wildlife interest. It cannot be assumed that the site can deliver 45 homes in light of the constraints identified.	residential development and is noted as an employment allocation in Policy SP%
IP346	88	This site is adjacent to the River Grippen. There appears to be existing occupiers which would need to be relocated. Availability of the site is unknown	The site is no longer included in the latest version of the plan.

**Table 3- Sites removed from Policy SP2**

- 5.1.11 A number of sites are now detailed within the Core Strategy Review Policy SP4 'Opportunity Sites' Four opportunity sites have been identified within IP-One that have potential for housing-led redevelopment and would contribute to the regeneration of the Waterfront and Town Centre. The Council will work with landowners and other interested parties to investigate opportunities and bring them forward through the development management process, taking into account constraints set out in the Appendix 4 site sheets.
- 5.1.12 Planning Prospects found that none of these sites were deliverable or viable. Significantly Site IP226 which has an indicative capacity of 337 dwellings, has a non-implemented application for 556 homes, been allocated but has not achieved any housing completions over the last 20 years, requires business relocation and lies entirely within Flood Zone 3. Given the site's history and constraints identified residential development cannot be assumed as suitable or viable.
- 5.1.13 The above information alongside Planning Prospects' report suggests that the Council's current and continued strategy for delivering homes is flawed. The Council by their own admission in removing sites from the Local Plan submission draft version have significant concerns over the viability and deliverability of numerous sites within the Core Strategy Review, which cannot be relied upon to deliver homes over the emerging plan period.
- 5.1.14 Therefore, the Council must look to identify significantly more sites, which are realistically deliverable and outside of the Borough's boundary to meet Ipswich housing needs.

#### **Delivery Assumptions**

- 5.1.15 The Council contend that the tight urban boundary to Ipswich Borough means that there is only one area of extensive greenfield land available on the periphery of the town and within the Borough. That land is the Ipswich Garden Suburb. Policy CS10 of the Core Strategy and Policies DPD Review Final

Draft states that the Ipswich Garden Suburb will incorporate residential development of approximately 3,500 dwellings.

- 5.1.16** The Ipswich Authority Monitoring Report 13 2017/18 (June 2019) housing trajectory sets out that the Council expect the Ipswich Garden Suburb to deliver homes at the following rate:

Year	Phase			Total
	Mersea	Crest Nicholson	Other Source	
<b>2018/19</b>	0	0	0	<b>0</b>
<b>2019/20</b>	0	10	0	<b>10</b>
<b>2020/21</b>	0	60	40	<b>100</b>
<b>2021/22</b>	45	90	75	<b>210</b>
<b>2022/23</b>	45	90	75	<b>210</b>
<b>2023/24</b>	45	90	75	<b>210</b>
<b>2024/25</b>	75	90	80	<b>245</b>
<b>2025/26</b>	75	90	75	<b>240</b>
<b>2026/27</b>	75	90	75	<b>240</b>
<b>2027/28</b>	75	90	75	<b>240</b>
<b>2028/29</b>	90	90	75	<b>255</b>
<b>2029/30</b>	90	90	75	<b>255</b>
<b>2030/31</b>	90	90	75	<b>255</b>
<b>2031/32</b>	90	90	65	<b>245</b>
<b>2032/33</b>	90	40	140	<b>270</b>
<b>2033/34</b>	90	0	125	<b>215</b>
<b>Total</b>	<b>975</b>	<b>1,100</b>	<b>1125</b>	<b>3200</b>

**Table 1- Projected Ipswich Garden Suburb Delivery Rate. Source: Authority Monitoring Report 13 2017/18 June 2019**

- 5.1.17** In total, the Council's AMR trajectory sets out that 3,200 homes will be delivered from the Ipswich Garden Suburb to 2034, leaving a residual requirement of 300 dwellings over the remaining two years of the plan period.
- 5.1.18** The PPG states that the advice of developers and local agents will be important in assessing lead in times and build out rates by year<sup>4</sup>, whilst previous versions of the PPG have suggested that Local

<sup>4</sup> Planning Practice Guidance Paragraph: 022 Reference ID: 3-022-20190722

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Authorities should consider the local delivery record when considering the future housing delivery assumptions.

- 5.1.19 Setting realistic delivery assumptions, including annual delivery rates and lead-in times for first completions to come forward, is necessary to project the number of homes that the sites identified by the Council can reasonably be expected to deliver both in the five year period and for the entire Plan period.
- 5.1.20 As discussed by Planning Prospects, historically Ipswich Borough has not delivered any large sites that are comparable to the scale proposed for the Ipswich Garden Suburb. Yet, the Council has no reasonable empirical evidence or experience to base their delivery assumptions for the Garden Suburb, or to critique any assumptions being made by its developers and promoters, the potential for planning harm from unrealistic delivery assumptions is increased.
- 5.1.21 Given that there is no evidence of delivery in Ipswich Borough from site scale comparable to the Ipswich Garden Suburb it is useful to refer to national evidence and average delivery rates. Planning Prospects assessed research undertaken by Lichfields in their 2016 'Start to Finish' report which includes an assessment of the average delivery rates of large housing sites across the UK. The Lichfields Report suggests that on sites of 2,000 or more dwellings, the average annual delivery rate is 171 homes per annum. Using this figure as a reasonable delivery assumption would significantly delay the delivery of housing at the Ipswich Garden Suburb in comparison to the Council's own trajectory.
- 5.1.22 Furthermore, in September 2019, Babergh and Mid Suffolk published their Housing Land Supply Position Statement<sup>5</sup>. Section 5 of this document provided analysis of national evidence on the delivery of housing using research documents and national housebuilder statements to inform average delivery rates nationally. Table 3 of this document details the average national delivery contained within these reports of sites of 500 dwellings or more, suggesting an average annual delivery rate of similar sized sites of approximately 150 dwellings.
- 5.1.23 The Ipswich Garden Suburb timescales for delivery within the latest AMR document have already been set back from the previous document published in 2018, this on its own evidences that the delivery assumptions for the Garden Suburb are over optimistic. It is strikingly clear that the Council's assumptions made in respect of the housing trajectory risks the deliverability of the Local Plan (and the Local Plan as a whole) and will inevitably lead to further housing land supply problems in the future. Table 4 below provides a comparison between the Council's position on the Garden Suburb at

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<sup>5</sup> Babergh Housing Land Supply Position Statement <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-District-Council-Housing-Land-Supply-Position-Statement-Sep-2019.pdf>

the point of the Local Plan adoption and the evidence informing the submission version of the emerging ILPR. The Council's position demonstrates a shift in the anticipated delivery rates and are now extended towards the end of the plan period.

Ipswich Garden Suburb	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	Total
Land west of Westerfield Road	0	0	0	318	320	105	300	300	200	300	91									835
South of River Waveney Line	0	0	0	0	0	0	42	300	300	200	200	199	173	150	150	150	150	150	150	1885
Central Ipswich North Research	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
<b>AMR 2015 Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>305</b>	<b>326</b>	<b>947</b>	<b>300</b>	<b>300</b>	<b>200</b>	<b>300</b>	<b>299</b>	<b>199</b>	<b>173</b>	<b>150</b>	<b>150</b>	<b>150</b>	<b>150</b>	<b>150</b>	<b>150</b>	<b>2700</b>
Messing	0	0	0	0	0	0	45	45	40	70	25	20	15	30	30	30	30	30	30	177
Cresswellham	0	0	0	0	0	0	60	50	50	50	50	50	50	50	50	50	50	50	50	300
Other	0	0	0	0	0	0	40	25	25	25	25	25	25	25	25	25	25	25	25	1225
<b>AMR 2019 Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>100</b>	<b>250</b>	<b>250</b>	<b>230</b>	<b>243</b>	<b>245</b>	<b>240</b>	<b>240</b>	<b>240</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>270</b>	<b>1200</b>

Table 4: Ipswich Garden Suburb – delivery comparison

- 5.1.24 Additionally, given the above information on national evidence of housing delivery rates and that Ipswich Borough has not delivered any large sites comparable to the scale proposed for the Ipswich Garden Suburb, it is clear that realistic assumptions on the delivery of Ipswich Garden Suburb have not been applied.

#### Conclusion on housing delivery

- 5.1.25 The implications of applying a more realistic delivery assumption at the Ipswich Garden Suburb, alongside the concerns over the deliverability and viability of numerous SP2 sites evidences that the Council's current and continued strategy for delivering homes is flawed.
- 5.1.26 Furthermore, through employing a stepped housing requirement, the Council is continuing to delay meeting the identified housing needs of the district and therefore conflicts with the advice detailed in the PPG.
- 5.1.27 Gladman assert that Ipswich Borough Council need to identify significantly more sites, which are realistically deliverable and viable to support the currently identified housing supply. It is evident that to ensure the Borough's housing need can be met that the sites, including realistically deliverable strategic sites, outside of the Borough's boundary, should be identified.

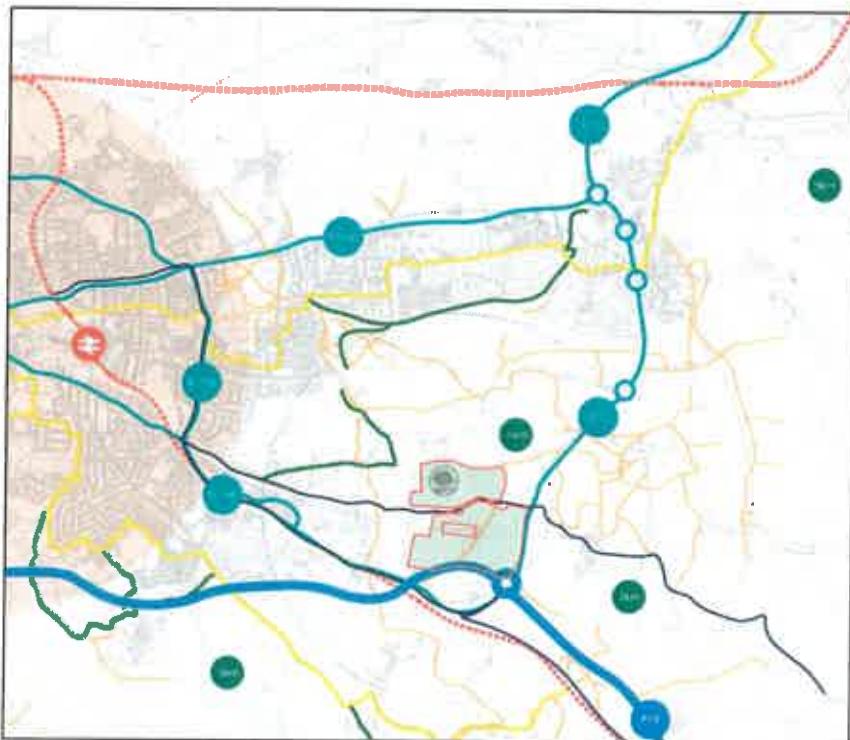
## **SITE SUBMISSIONS**

## 6.1 Overview

- 6.1.1** Gladman has land interests within the neighbouring districts of East Suffolk and Babergh. Details of these sites are outlined below. The tightly bounded nature of Ipswich Borough means that greater consideration will need to be taken to development opportunities beyond administrative boundaries working under the duty to cooperate. This will be required to ensure that the development needs of the area can be met whilst maintaining a rolling five year housing land supply.

## **6.2 Orwell Green Garden Village**

- 6.2.1** Gladman are promoting land to the east of Ipswich, within East Suffolk District, for the development of 'Orwell Green Garden Village'. The Orwell Green Garden Village is ideally located on the eastern outskirts of Ipswich, approximately 6.5km from the Town Centre. The land extends to approximately 142 hectares and is located to the north of the A14 and the west of the A12, which together act as a major transport corridor, linking the urban areas of Cambridge and Ipswich to the east coast.



## **Orwell Green Site Location Plan**

- 6.2.2 The site is included within the Suffolk Coastal Strategic Housing and Economic Land Availability Assessment and Interim Sustainability Appraisal under Site Option Reference 485: Land North and South of Bucklesham Road, IP10 0AG. The SHELAA concludes that the site is potentially suitable for development, subject to a range of wider considerations associated with strategic scale development proposals. Gladman are of the view that in identifying an appropriate strategy for the future development of Ipswich and East Suffolk District, there is a strong case for the allocation of additional land for the development of a garden village to the East of Ipswich in order to meet the development needs of the area and support the wider economic growth ambitions of the region and the UK more widely.
- 6.2.3 Garden Villages are an effective way to deliver housing within an appropriate timeframe and with critical mass that will facilitate the delivery of infrastructure such as schools, health centres and transport improvements to the benefit of new and existing communities. Each project and location has its own specific context which means the Garden City principles are not a blueprint for designing new Garden Villages but are key characteristics that make Garden Villages successful.
- 6.2.4 The Orwell Green Garden Village site is well connected and provides a real opportunity to provide a well-planned, well located, well designed community that is supported by the necessary infrastructure and facilities and that meets all the objectives of the Government's Garden Communities Programme. The proposal also has the ability to provide a comprehensive approach to supporting the planning of the wider strategic planning area

Key details of the development proposal are highlighted below:

- A total site size of approximately 142ha
- Approximately 72ha of land for the development of a mix of house types, providing up to 2,700 new homes to suit the requirements of a wide range of households.
- It is anticipated that two new primary schools would be developed on the site and that express bus provision will be made available to access a nearby secondary school.
- Green Infrastructure: approximately 60ha
- An extensive range of new sport, recreation and play facilities
- The development of allotments, a village green and community orchards
- A well located and connected Village Centre at the heart of the development - designed to include space for a market square, community hall, school & crèche, sports & play facilities, a medical centre & pharmacy, a café, a supermarket, other smaller retail units, a village pub and infrastructure for public transport.

- 6.2.5 A Framework Plan, setting out the proposals for the site is provided at Appendix 1 to these representations.

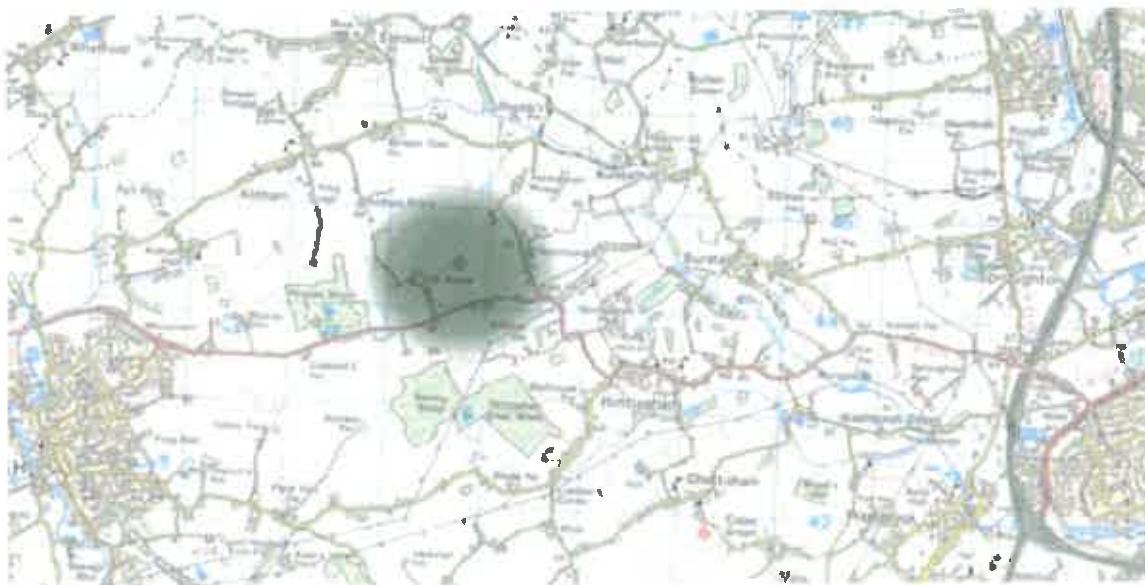
- 6.2.6 A sustainable and suitable access can be achieved from the A12 via a new roundabout. A roundabout in that location would be helpful in terms of aspirations to reduce speeds (from the current 70mph to 40/50mph) and allow for better distribution of traffic along that road.
- 6.2.7 The site is also well located in terms of public transport routes. It is in proximity to regular bus services which run throughout the day between Ipswich and Felixstowe (services 75/76 and 77), with the opportunity to promote and establish further sustainable modes of transportation through new and improved bus routes and services and by upgrading and maintaining public rights of way and new cycle ways.
- 6.2.8 The site does not fall within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty nor is it within an area of fluvial flood risk, which is a constraint to future development across much of the wider area. It has no physical constraints that would stop the site coming forward. Furthermore, the site can be brought forward in a manner that is sensitive to its wider landscape setting; creates strong and well-connected green infrastructure; and, that provides the opportunity to deliver significant long-term ecological benefits through the retention and enhancement of many existing features as well as the provision of new features that will encourage biodiversity.
- 6.2.9 In terms of sustainable energy, the new development can be designed to mitigate energy usage and loss with high levels of insulation, maximisation of natural light and optimum solar orientation. There are a number of renewable energy generation technologies that can be investigated to help supply the Garden Village with sustainable energy networks, including the installation of photovoltaic panels, local energy storage and sharing by way of batteries, solar thermal panels, ground and air source heat pumps, wind turbines or biomass boilers.
- 6.2.10 The development of a Garden Village in this location also provides a tremendous opportunity to improve the quality of areas where people live and work. As well as on site employment opportunities, there are a wide range of employment, retail and leisure opportunities in proximity to the site, including those at: Warren Heath Retail Park and the Euro Retail Park, Ransomes Industrial Estate, Springbank Industrial Estate, Three Rivers Business Centre and via its strong links to the centre of Ipswich.
- 6.2.11 The site benefits from having a single landowner who wishes to make the site available for development. This presents an ideal opportunity for development to be brought forward at the Garden Village in shorter timescales than are often observed in relation to strategic development proposals of this nature.
- 6.2.12 The site can be delivered on a phased basis. At this stage we would foresee that a master builder would deliver key infrastructure. It is envisaged that the master builder would play a pivotal role in the delivery of Orwell Green Garden Village, together with a coalition of key stakeholders, through an

effective governance structure that would be put in place from the outset of the project. A community management company with resident and stakeholder participation is envisaged, funded through an annual management charge and on-site funding sources. It is envisaged that the open space and community assets of the Garden Village would be transferred to a management trust or parish council that would be responsible for protecting them in perpetuity.

- 6.2.13 The Orwell Green Garden Village presents an ideal opportunity to establish an exemplar Garden Village through an effective partnership between the local planning authorities within the Ipswich Strategic Planning Area and local stakeholders. It provides huge potential to create a sustainable, distinctive and attractive residential led mixed use new settlement in a location where people will genuinely want to live.

### 6.3 A Garden Village for Babergh

- 6.3.1 Gladman are also promoting a potential location for growth, which has the ability to take the form of a new settlement located in Babergh District.
- 6.3.2 Gladman has identified a potential area of search for a new Garden Village in a strategic location in Babergh which lies between the settlements of Hadleigh and Ipswich. Gladman are working with the landowners and believe there is an opportunity to deliver a sustainable new settlement in this location which could help meet the housing needs of Babergh and Mid Suffolk, as well as the needs of the wider housing market area including Ipswich. A Location Plan which shows the broad area of search for the new settlement can be seen below:



*Babergh District Garden Village - Broad Location Plan*

- 6.3.3 The new Garden Village provides the opportunity to deliver the homes people need in well planned, attractive new communities of the highest quality. It has the potential to deliver a combination of new high-quality market and affordable homes, as well as specialised housing. We also envisage business and employment uses, community uses and extensive greenspace forming part of the proposals.
- 6.3.4 The Government has identified that new settlements have a key role to play, not only in meeting this country's housing needs in the short-term but also in providing a stable pipeline of housing well into the future.
- 6.3.5 Creating new communities can minimise the need to develop urban extensions, maintaining the character of existing settlements and reducing pressure on existing social infrastructure such as schools and health services. New settlements can be planned comprehensively, building on the Garden City concept to deliver new homes which will be served by new local infrastructure and will effectively become new communities in their own right.
- 6.3.6 Gladman have identified the following key characteristics which we believe provide a framework for Garden Villages:
- Creating a locally distinctive and attractive environment
  - Provision of a policy compliant level of affordable homes in a variety of different tenures
  - Use of high-quality materials and design
  - Well designed, multi-functional accessible greenspaces
  - Sustainable transport options
  - Enhancing the natural environment and biodiversity
  - Providing homes close to employment opportunities
  - Services for day to day needs

## 6.4 Why this location?

- The site is strategically located between Ipswich and Hadleigh on the transport corridor between Ipswich and Sudbury;
- The site has the ability to assist in addressing high levels of housing need and poor affordability;

- 
- **The site creates opportunities to enhance existing sustainable transport connections within the wider Suffolk area**
  - **The site is ideally located to support the economic growth ambitions of the New Anglia LEP and assist in addressing issues such as low productivity, skills and attainment levels and lower than average earnings**
  - **Two willing and committed landowners, in partnership with Gladman, are in a position to bring forward sufficient land for a garden village, ensuring the scheme is deliverable**

## 7 CONCLUSIONS

### 7.1 Assessment against the tests of soundness

- 7.1.1 For the emerging Ipswich Local Plan Review to be found sound at examination it must be able to meet the four tests of soundness as required by paragraph 35 of the Framework. This will require the Local Plan to be positively prepared, justified, effective and consistent with national planning policy.
- 7.1.2 Gladman submit that the Local Plan as currently proposed is unsound and fails to meet the tests of soundness outlined above. Gladman has significant concerns with regard to the Council's ability to meet its housing needs in full over the plan period and also the impact that this will have on the wider Ipswich Strategic Planning Area. This issue must be addressed through positive action and engagement under the Duty to Cooperate.
- 7.1.3 It is vital that the Plans that are put in place across the area can meet the minimum housing needs set using the standard method. In addition, careful consideration will need to be given to the need to plan for new infrastructure, the need to support economic growth ambitions and the need to deliver affordable housing to meet identified needs when setting the housing requirement. The Council has failed to address these issues which are relevant in the Ipswich Strategic Planning Area. Indeed, the proposals within the emerging Local Plan merely seek to roll forward an existing strategy which has failed to deliver the scale of homes needed to meet identified housing needs. It is clear that an alternative strategy is therefore required to support the delivery from the proposed components of supply, such as the Ipswich Garden Suburb and sites within the IP-One area. As previously highlighted in response to the Reg 18 Preferred Options consultation, the report undertaken by Planning Prospects on behalf of Gladman provides reasoned justification for reaching the conclusion that current delivery assumptions from within Ipswich Borough are not realistic and must be supplemented by additional housing sites beyond the administrative boundary in order that an effective plan can be put in place that meet the housing needs of the HMA as a whole.
- 7.1.4 The Orwell Green Garden Village and Babergh Garden Village proposals provide significant opportunities to address these issues as well as ensuring the delivery of affordable housing, supporting economic growth and improvements to the area's infrastructure ambitions. The sites are well related to Ipswich and can therefore be brought forward to make a sizeable contribution to the housing needs of the Borough and the HMA as a whole during the plan period.
- 7.1.5 Given the significant issues raised, Gladman request to participate at the hearing session(s) at the Examination In Public.



0 100 200 300 400 500m

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Application Boundary (141.85 ha)

Proposed Infrastructure

New Roundabout Access off A12

Main Avenue

**Development - 57% of overall Area (81.04ha)**

Residential (72.48 ha)  
(2,700 dwellings @ 38 dph including 100no. apartments within the Neighbourhood Centre)

Neighbourhood Centre (2.30ha)

Up to 100 Apartments  
Single Large Retail Unit (800sqm)  
3 Smaller Retail Units/Terraces (500sqm)  
Doctors Surgery (900sqm)  
Community Building/Pavilion (400sqm)  
B1 Office (400sqm)

Primary School (0.05ha)  
Primary School 1 - 2 Form Entry & Expansion (2.1ha)  
Primary School 2 - 2 Form Entry & Expansion (2.1ha)

Extra Care Apartments (0.9ha)

Pub/Restaurant (0.26ha)

**Green Infrastructure - 43% of overall Area (60.84ha)**

BANG (48.89 ha)

Sports Pitch & Changing (5.54ha)

Village Green with Cricket Pitch and Community Croftard (1.66ha)

Allotments (1.00ha)

Indicative Play Areas (0.12ha)

Indicative Detention Basins (2.6ha)

Existing Public Right of Way

Circular Walk

Retained Trees and Hedgerow

Proposed Trees and Hedgerow

Acoustic Bund and Fence

**Felicia Blake**

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**From:** Henry Brown  
**Sent:** 02 March 2020 15:25  
**To:** PlanningPolicy  
**Cc:** Ursula Rafferty; Chris Pattison  
**Subject:** Ipswich Local Plan Review Final Draft Consultation  
**Attachments:** 02.03.20 Ipswich Local Plan Final Draft Representation.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/ Madam

On behalf of our client, Grainger plc, please find attached our representation to the consultation on the final draft Ipswich Local Plan. I would be grateful if you could acknowledge receipt of this email.

Kind regards

**Henry Brown**

**Turnberry**

41-43 Maddox Street  
London  
W1S 2PD

Web: [www.turnberryltd.com](http://www.turnberryltd.com)

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Ipswich Borough Council,  
Planning Policy,  
3W Grafton House,  
15-17 Russell Road,  
Ipswich,  
IP1 2DE

# Turnberry

Our ref: GP-KES

Your ref:

2<sup>nd</sup> March 2020

Dear Sir/Madam,

## Ipswich Local Plan Review Final Draft- Consultation Response

This representation has been prepared by Turnberry on behalf of our client, Grainger plc, who has interests in the strategic area East of Ipswich. This submission should be interpreted as an **OBJECTION** to the Ipswich Local Plan Review Final Draft consultation documents on the basis that it is not legally compliant and unsound for reasons that will be detailed in this representation and summarised below:

1. The Plan is Ineffective as it does not allocate an adequate number of deliverable sites over the plan period to maintain the housing need of the Borough as a consequence of the 20% buffer now required under the Housing Delivery Test;
2. There is a lack of evidence to support the proposed windfall rate which may mean unmet need will increase over the plan period;
3. By virtue of lack of available sites, the draft Plan falls in its Duty to Cooperate with neighbouring planning authorities to identify additional sites resulting in the Plan not being justified or positively prepared as well as being contrary to the legal requirements of the Localism Act 2011.

The 8,010 figure for housing need over the plan period does not include the 20% buffer required due to Ipswich Borough Council failing the Housing Delivery Test. This buffer will need to be provided in addition to the 8,010, 20% of which would equal an extra 1,620 dwellings. This equates

to a total of 9,630 dwellings required over the plan period. Of this figure of 8,010 there are 1,910 dwellings which are either completed, under construction, have planning permission, or have resolution to grant permission, leaving a figure of 6,100 dwellings to be allocated through the Local Plan to meet the full requirement. In policy CS7, the total Housing Land Supply is stated to be 7,214 dwellings. Although this figure is in excess of the 6,100 needed using the standard method, it does not cover the entirety of the additional 1,620 homes needed to account for the 20% buffer. The supply outlined in policy CS7 accounts for only 1,114 of the 1,620 dwellings needed for the 20% buffer. Therefore, Ipswich Borough Council cannot demonstrate a housing land supply that meets the housing need with the 20% buffer required by government. This means that Ipswich must look to its neighbours within the Ipswich Strategic Planning Area to account for this deficit of 506 dwellings required over the plan period.

Moreover, Ipswich Borough Council may be over-estimating their windfall sites at 700 homes for the period 2022-2036 which equates to 50dpa (dwellings per annum). There is insufficient evidence to support this given the recent decline in windfall rates.

Historic rates of windfall delivery have been drastically declining in that past few years (see summary table below), particularly in relation to windfall through permitted development. We argue that this trend will continue as the majority of dilapidated offices have now taken full advantage of the change in permitted development rights to allow their conversion to residential without the need for full planning permission. Therefore, overall windfall rates will continue to decrease and level out at a lower rate likely to be lower than the 50dpa suggested in policy CS7 in the draft Plan.

	Windfall rate	Windfall permitted development rate	Net Windfall
2015-2016	230	145	85
2016-2017	175	86	89
2017-2018	43	17	26

*Overall windfall rates and windfall permitted development rates from 2015-2018*

Therefore, the scale of unmet need could increase over the plan period, unless more evidence is brought forward to justify the windfall rate.

In identifying sites outwith its boundaries, the Council should be prioritising development as close as possible to the Borough's boundaries and in sustainable locations with good transport links, such as arterial roads with bus routes available.

In particular, employment is projected to increase within the East of Ipswich planning area, especially within Suffolk Coastal District Council which has seen a 13.4% increase in employment from 2001-2016 owing to Felixstowe and Martlesham employment area being centres for employment east of Ipswich. Business and professional services has a forecasted growth of 12,400 jobs (+31%), with the majority of associated demand for office space focused within Ipswich town centre and at Martlesham Heath/Adastral Park. Therefore, unmet housing need in Ipswich should be sustainably located close to the source of that need and where employment opportunities are greatest. This is supported by Paragraph 103 of the NPPF which states:

*"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."*

The Council should therefore bring forward a process under the Duty to Cooperate to identify sites in neighbouring Boroughs to resolve its unmet need, and should do so in accordance with the terms of the NPPF i.e. unmet need being sustainably located closest to the point of need, along arterial routes with good bus links and in the East of Ipswich area, close to the largest employment centres of Ipswich, Martlesham and Felixstowe.

I trust these representations will be helpful to the Council in framing its next steps.

Yours faithfully,

Chris Pattison  
Turnberry

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

H



## Felicia Blake

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**From:** Mamun Madaser  
**Sent:** 27 February 2020 14:07  
**To:** PlanningPolicy  
**Subject:** Local Plan Ipswich consultation response  
**Attachments:** Ipswich Local Plan Consultation Response DRAFT.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi there,  
Please find Habinteg's response to Ipswich's recent Local Plan consultation.  
If you could please confirm receipt of the document that would be very helpful.  
Kind regards,  
Mamun  
**Mamun Madaser**  
Parliamentary & Research Officer



T 020 7822 8706 | [habinteg.org.uk](http://habinteg.org.uk)  
Holyer House, 20-21 Red Lion Court,  
London, EC4A 3EB



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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	
<b>Please return this comments form to:</b>	<p><u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or</p> <p><b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b></p>
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>

#### PART A PERSONAL DETAILS

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	Mr	
<b>First name</b>	Mamun	
<b>Last name</b>	Madaser	
<b>Job title (where relevant)</b>	Parliamentary & Research Officer	
<b>Organisation (where relevant)</b>	Habinteg Housing Association	
<b>Address (Please include post code)</b>	Holyer House 20-21 Red Lion Court London EC4A 3EB	
<b>E-mail</b>		
<b>Telephone No.</b>	<b>0207 822 8706</b>	

## PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation (and client if you are an agent):	
---	--

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Ipswich Local Plan Final Draft – Policy DM12: Design and Character	<p>Habinteg has 50 years' experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response therefore focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of Ipswich.</p> <p>Habinteg strongly supports the approach to Part M4(2) accessible and adaptable homes. It's great to see Policy DM12 ask for "25% of new dwellings will be required to be built to Building Regulations Standard M4(2)." The policy ask is significant in helping to ensure that a proportion of new homes will be accessible.</p> <p>According to the English housing survey only 7% of English homes have the accessibility features to classify them as 'visitable'. Habinteg believe that all new homes should be built to Part M4(2) accessible and adaptable to help meet the national accessible homes deficit. A Habinteg research report (A forecast for accessible homes) published in the summer of 2019 revealed that in England only 22% of new homes due to be built by 2030 will meet accessible and adaptable standards. With this in mind we warmly welcome the prospect of Ipswich Borough Council setting out the requirement for a proportion of homes to have the capability to adapt as residents' need change.</p> <p>The policy goes on to say that "The Council will consider waiving or reducing the requirement where the circumstances of the proposal, site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable." We believe the language should be firmer, so that there is a narrower definition given for when the standard may not be applied. A definition which firmly places the burden of proof onto the developer which will help minimise instances where compliance with the policy is argued out during the planning permission process.</p> <p>This emphasises for us that alongside an increased supply of accessible and adaptable homes it is critical that an adequate number of homes are built to Category M4(3) wheelchair user dwelling standard. Habinteg's <i>Forecast for Accessible Homes</i> also found that just 1% of homes outside London are set to be</p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<p><b>built to wheelchair dwelling standards between 2019 and 2030.</b></p> <p>We would therefore like to see Ipswich set a similar requirement for wheelchair user dwellings as that set down in the London Plan which requires that, 10% of new homes comply with Part M4 (3) Standard (the other 90% required to be built to part M4 (2) accessible and adaptable standard). Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of Part M4(3) homes should be considered as a starting point for all local plans.</p> <p>Habinteg's in house consultancy Centre for Accessible Environments, (CAE) offer bespoke training and consultancy on all aspects of access including housing, public spaces and community facilities. CAE's services may be of benefit to the Central Lancashire planning department in ensuring housing is delivered to the required M4(2) / M4(3) standards. The team have delivered support to several local authorities as well as statutory bodies such as Homes England, helping to upskill staff in the specific characteristics of accessible housing, as well as providing practical support reviewing development plans and proposals. You can read more on the CAE website at <a href="http://www.CAE.org.uk">www.CAE.org.uk</a></p> <p>Please don't hesitate to get in touch with us if we can help in any way with development of the Central Lancashire plan. <a href="mailto:cmcgill@habinteg.org.uk">cmcgill@habinteg.org.uk</a></p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

**Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.**

### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**  Yes

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**  Yes

**Adoption of the Ipswich Local Plan Review.**  Yes

### **PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Felicia Blake**

---

**From:** Will Dowe  
**Sent:** 10 February 2020 21:00  
**To:** PlanningPolicy  
**Subject:** Alnesbourn Crescent Planning Proposal

Good afternoon

I am emailing to express my concern at the council's proposal to allow the grassland area adjacent to Alnesbourn to be used for housing.

This area of land borders an AONB which would be negatively affected by additional vehicular traffic in the area.

The existing access track to Bridge Wood/Orwell Meadows/Hallowtree Campsite is already in disrepair.

Additional traffic in the area would be at the detriment to the properties in the Alnesbourn Priory site.

It is a short-sighted effort by the council to boost housing in an area which is unequipped to handle the additional capacity.

No work should be allowed to take place. The land must be kept undisturbed which will allow the flora and fauna to develop. This will bring far more value to the people living and working in that area.

Yours sincerely,

Will Dowe  
Hallowtree Scout Activity Centre

**Felicia Blake**

---

**From:** Paul Harvey  
**Sent:** 26 January 2020 13:31  
**To:** PlanningPolicy  
**Subject:** Co-op redevelopment Prince of Wales drive

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I am sending this e-mail, concerning the impact of new houses and flats on the old co-op site. My main issue is the parking with not enough spaces for the residents and friends, this will over flow to near by roads like Chatsworth, coupled with the school run would cause a accident just waiting to happen. I feel co-op have dragged there feet for so long knowing after so many years they can apply for a domestic application instead of what it was intended for. Thank you for listening.

**Felicia Blake**

---

**From:** Cooper, Eric  
**Sent:** 03 March 2020 07:47  
**To:** PlanningPolicy  
**Subject:** RE: Ipswich Local Plan Draft Final Public Consultation  
**Attachments:** Highways England Ipswich Local Plan Response.pdf

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs

Unfortunately, the wrong attachment was sent with Highways England's response to the Local Plan consultation.

The correct version is now attached. I apologise for any inconvenience this causes.

Regards

Eric

**Eric Cooper, Spatial Planning Manager**  
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

Web: [www.highwaysengland.co.uk](http://www.highwaysengland.co.uk)

---

**From:** Cooper, Eric  
**Sent:** 02 March 2020 23:45  
**To:** 'PlanningPolicy@ipswich.gov.uk' <PlanningPolicy@ipswich.gov.uk>  
**Subject:** ipswich Local Plan Draft Final Public Consultation

Dear Sirs

Please find attached Highways England's response to the above consultation

Regards

**Eric Cooper, Spatial Planning Manager**  
Highways England | Woodlands | Manton Lane | Bedford | MK41 7LW

Web: [www.highwaysengland.co.uk](http://www.highwaysengland.co.uk)

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<https://www.gov.uk/government/organisations/highways-england> | [info@highwaysengland.co.uk](mailto:info@highwaysengland.co.uk)

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Planning Policy  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich Suffolk  
IP1 2DE

Eric Cooper  
Operations - East  
Woodlands  
Manton Lane  
Bedford MK41 7LW

2 March 2020

Dear Sirs

### **Consultation on Ipswich Local Plan Review Final Draft**

Thank you for inviting Highways England to comment on the Final Draft Review of the Ipswich Borough Council Local Plan.

Highways England is responsible for the operation, maintenance and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding Ipswich, this relates to the A14 and A12 trunk roads. Consequently, our comments on the draft Local Plan are limited to those aspects which relate to these roads.

In general, Highways England considers that Ipswich Borough Council's consideration of land use policy, the transport evidence to support it and the consequential understanding on the impact of the strategic road network is generally sound and consistent with government policy.

Through the process of the development of this local plan and those covered by adjacent planning authorities which fall within the Ipswich Strategic Planning Area (ISPA), Highways England has worked closely with Suffolk County Council on the development of the evidence base to support the plan. Specifically, this relates to the modelling work which is reported in some detail in the WSP Technical Note - RIS Scheme SRN Impacts dated July 2019.

Whilst the majority of the proposed development growth within Ipswich lies remotely from the SRN, the modelling work shows that accumulatively growth in the Ipswich Strategic Planning Area is predicted to collectively add to significant strain on the transport network in and around Ipswich. Additional highway capacity will not on its own address these issues and it is noted that the local authorities across the ISPA agree that robust steps must be taken to prioritise healthy and sustainable travel. Highways England supports this position.

The draft Local Plan identifies a package of transport mitigation measures to reduce vehicle movements and Suffolk County Council as the Highway Authority has developed

a strategy which contains a package of mitigation measures to deliver modal shift and mitigate impacts on the wider Ipswich highways network.

These include:

- Transport infrastructure to encourage and support sustainable modes of transport
- A Bus Quality Partnership
- A Smarter Choices programme
- Review of car parking and pricing strategies
- Review of park and ride strategy
- Junction improvements

Highways England supports this strategy.

### **Policy ISPA2 Strategic Infrastructure Priorities**

#### **Major Infrastructure**

Within the major infrastructure proposal list a number of A14 improvements required to support the proposed growth have been identified. This is consistent with the findings of the modelling and study work undertaken. The Plan notes that longer term funding would comprise a mixture of growth funds, developer funding together with monies identified from a future Roads Investment Strategy (RIS). RIS2 which covers the period 2020-2025 has not yet been published so it is not possible to confirm that this would be the case, or whether any funding would be available from a future RIS.

Consequently, Highways England consider without the robust measures identified by Suffolk County Council and referred to above, it is not certain that the delivery of the latter stages of the plan can be achieved. Consequently, it is vital that a robust manage and monitor approach is maintained through out the life of the plan.

#### **Ipswich Northern Route (Bypass)**

Whilst not part of this Plan, It proposes a longer term aspiration for an Ipswich Northern Bypass which would lie within the East Suffolk Council and Mid Suffolk District Council area. The scheme would improve connectivity between the A14 and A12, reduce pressure on the A14 and improve network resilience, especially to the sections of A14 in the vicinity of the Orwell Bridge and Junction 55 (Copdock). Highways England has no objection in principle however it is noted however that Suffolk County Council on 25 February 2020 at a cabinet meeting resolved not to take this scheme forward.

#### **Ipswich Port**

The Plan aspires for a longer proposal for an east bank link road and a new A14(T) junction could work which would provide increased accessibility and reduce congestion to this area of Ipswich. As stated Highways England are not in favour of the proposals as there is concern with resultant local 'junction hopping' along the A14 which would reduce highway capacity, and more significantly it is considered that there is insufficient geometric capacity to accommodate an additional junctions on this section of the A14.



## **Policy CS20: Key Transport Proposals**

The evidence base provides some indicative proposals for upgrading of a number of junctions along the A14 and potentially cost-effective measures for resolving identified link and junction capacity problems arising from growth. The menu of potential measures includes proposals to re-establishing the Bury Road Park and Ride and the provision of a new site in Nacton Road.

Highways England considers that subject to further work these are potentially feasible options and if the aspirations for modal shift amongst the new and existing communities set out in the Plan are achieved, then it is likely that they will reduce impacts on the network below what was originally modelled.

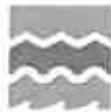
However, it is acknowledged that those measures will not address the underlining capacity issues of the A14 corridor and further measures may be required such as variable mandatory speed limits on the A14 offer a means of managing increasing demand on the links more safely, and substantial improvements at Junction 55 (Copdock)

Funding of such measures is clearly an issue and as noted above, at this stage there is no certainty of the availability of future Highways England capital funding programme funding given that RIS2 has yet to be published.

Highways England looks forward to ongoing engagement with the local plan authority and Suffolk County Council on developing the measures identified in the plan which will support enhanced capacity to the public and private transport network.

Yours faithfully

Eric Cooper  
Spatial Planning Manager



Ms Felicia Blake  
Ipswich Borough Council  
Grafton House  
15 - 17 Russell Road  
Ipswich  
Suffolk  
IP1 2DE

Our ref: PL00121006

2 March 2020

Dear Ms Blake

**Ref: Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review - final draft, and Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review - Final Draft (January 2020)**

Thank you for consulting Historic England on the Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review - final draft, and Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review - Final Draft (January 2020). As a statutory consultee, our role is to ensure that the conservation of the historic environment is fully integrated into planning policy and that any policy documents make provision for a positive strategy for the preservation and enjoyment of the historic environment.

Our comments below should be read with reference to our previous response dated 13<sup>th</sup> March 2019.

## SUMMARY

Under paragraph 35 of the National Planning Policy Framework ('The Framework') we consider that this Plan is unsound as some aspects are not effective, or consistent with national policy. We have identified in detail below where we find the Plan unsound and what measures are needed to make the Plan sound. In particular we have recommended the inclusion of specific policy references for heritage assets and identified mitigation within Policies SP2 (Land Allocated for Housing), SP4 (Opportunity Sites), SP5 (Land Allocated for Employment Use), SP11 (The Waterfront), SP12 (Education Quarter), and SP13 (Portman Quarter).

## DETAILED COMMENTS

### Policy CS2: The Location and Nature of Development

Policy CS2: The Location and Nature of Development outlines how the sustainable



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growth and regeneration of Ipswich will be achieved. This includes focussing new residential development and community facilities into the town centre, the Waterfront, Portman Quarter, and Ipswich Garden Suburb and into or within walking distance of the town's district centres, and supporting community development, which we support. We note the reference to higher density homes, which is understandable in an urban setting, but are concerned that the term is treated as a synonym for tall buildings / flats. This appears to be confirmed in the final paragraph of Policy CS2 which states: *"In the interests of maximising the use of previously developed land, development densities will be high in the town centre, Portman Quarter and Waterfront, medium in the rest of IP-One and in and around the district centres, and low elsewhere, provided that in all areas it does not compromise heritage assets and the historic character of Ipswich."*

The inference here is that 'high density' could 'comprise' the historic character of Ipswich, presumably by way of tall buildings affecting the setting of these assets, impacting on their significance.

While we welcome the aspiration that densities should not compromise heritage assets and the historic character of Ipswich, we consider that this section on densities needs to be clarified, and 'high', 'medium' and 'low' densities defined. The policy should also make it clear that good design should not only respect the historic character of an area, but respond to it. High density does not need to take the form of flats, and we would refer you to our 'Increasing Residential Density publication from 2018:

<https://historicengland.org.uk/images-books/publications/increasing-residential-density-in-historic-environments/>

Indeed the presence of heritage assets does not automatically preclude high density development, and high density development is often compatible with the character of an historic place and can provide an opportunity to reconnect a fractured, fragmented or damaged historic townscape. CS2 as currently drafted could preclude such development.

**Policy CS3: IP-One Area Action Plan;**  
**SP2: Land Allocated for Housing;**  
**SP4: Opportunity Sites;**  
**SP5: Land Allocated for Employment Use;**  
**Policy SP11: The Waterfront;**  
**Policy SP12: Education Quarter; and**  
**Policy SP13: Portman Quarter**

We are extremely concerned about the lack of clarity regarding the status of the IP-One Area Action Plan, the lack of clear delineation of the opportunity areas, and the absence of robust policies for these which in our view renders this aspect of the Plan



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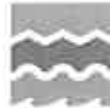


not effective, and therefore unsound. The IP-One Area covers the historic core of Ipswich, and contains the highest concentration of the town's designated heritage assets. Ipswich is particularly special in that it has origins as one of only four international ports in the Middle Saxon period. As a major Anglo-Saxon centre engaged in long-distance trade, it has an internationally important archaeological record from this time. The town's early fortunes were linked to the developing Anglo-Saxon kingdom of East Anglia, and *Gipeswic* was a likely trading settlement founded by the Royal House, notably associated with the burial ground at Sutton Hoo. The area also includes a number of notable listed buildings, as well as parts of several Conservation Areas. The appropriate management of the historic environment will therefore be a significant consideration in the design and deliverability of new development within the IP-One area, and it is therefore critical that the Plan provides a clear framework against which future development proposals can be assessed to ensure that these important assets are conserved and enhanced in line with the requirements of the NPPF.

## Status of the IP-One Area Action Plan

Policy CS3: IP-One Area Action Plan discusses the IP-One Area Action Plan, and advises that the Council will "prepare and implement an IP-One Area Action Plan" and goes on to state that the Area Action Plan will include policies, which amongst other things will "define the extent of the Waterfront and the Portman Quarter", "allocate sites for development", "set down development principles", and identify heritage assets which development should have regard to" etc. The way this section is currently drafted suggests that this work has yet to be completed, and that in due course a new Area Action Plan will be prepared, clarifying the opportunity area boundaries, and setting out detailed policy criteria against which development proposals will be tested. However, following conversation with the Council we now understand this not to be the case, and in fact that the IP-One Area Action Plan has already been finalised and incorporated into the current Site Allocations and Policies DPD review (January 2020). We therefore find Policy CS3 highly confusing and misleading. Our main concern is that the Plan should be readable and useable. This document is likely to be read by developers, home owners and other planning professionals, and in places (most notably those sections discussing the IP-One Area) it is extremely difficult to follow. If it is the case that the IP-One Area Action Plan has been completed and is incorporated into the Regulation 19 Plan, then Policy CS3 and supporting text need to clearly state this. Notwithstanding this, it is our contention that the Council has not followed CS3 in that it has not clearly defined the extent of the opportunity areas (Policy CS3, criteria a), has not set down the development principles which will be applied to new development (Policy CS3, criteria c), and has not identified the heritage assets which development proposals will need to have regard to and integrate new development with the existing townscape (Policy CS3, criteria e). These issues are discussed in detail below.





## Delineation of Opportunity Areas

With regards the delineation of the opportunity areas, it is unclear which boundaries the Council is promoting through this Plan, and which areas are covered by Policies SP11, SP12, and SP13. The Policies Map IP-One Area inset and Chapter 6 of the Plan shows detailed boundaries for eight opportunity areas, namely:

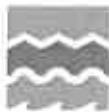
- Opportunity Area A - Island site;
- Opportunity Area B - Merchants Quarter;
- Opportunity Area C - Mint Quarter and surrounding area;
- Opportunity Area D - Education Quarter and surrounding area;
- Opportunity Area E - Westgate;
- Opportunity Area F - River and Princess Street Corridor;
- Opportunity Area G - Upper Orwell and Canal side; and
- Opportunity Area H - Holywells

However, these areas do not appear to match up with the illustrative boundaries given in Diagram 3: The Ipswich Key Diagram, or the names for these areas given in Policies SP11 (The Waterfront), SP12 (Education Quarter), and Policy SP13 (Portman Quarter). This is important because as drafted it is unclear whether for example, SP11 (The Waterfront) comprise and covers the full extent of Opportunity Area A - Island Site, and Opportunity Area B - Merchants Quarter as illustrated in Chapter 6 etc. For the Plan to be effective the opportunity areas need to be clearly defined and labelled on the policies map, so that it is clear which policy and supporting text relates to which area, and the extent of the land in question.

## Policy coverage and a lack of robust wording to guide development

We consider that there needs to be greater clarity within the Plan regarding the status of the IP-One opportunity areas. Chapter 6 of the Site Allocation document provides further information on the opportunity areas, setting out development principles for each area, which we welcome. However, these principles are not set out in policies SP11, SP12, and SP13, and it would appear that the other opportunity areas in this section of the Plan (see our comments regarding the mismatch of opportunity areas above) don't have policies at all. Nor are they set out in Policies SP2: Land Allocated for Housing, SP4: Opportunity Sites, or SP5: Land Allocated for Employment Use. It is therefore unclear what status these development principles have in the context of decision-making. This issue is further confounded when the Local Plan allocations are factored in. Paragraph 6.1 of the Plan makes it clear that the individual allocation policies take precedence over the Opportunity Area guidance and site sheets for an individual area. This does not give a consistent vision for each area with clarity for a developer on what development to bring forward or the ability for the Council to set out what development will meet the aspirations for the area. This is particularly critical for non-allocated sites, where there is an inherent risk that speculative applications may





come forward with no overarching framework to guide development.

We understand that the Council considers that the Plan should be read as a whole and on this basis they consider that it is not necessary to include these criteria within policies SP2, SP4, SP5, SP11, SP12, and SP13. Whilst we appreciate that the Plan should be read as a whole, awareness of the relevance of the historic environment is often limited and could be missed, and so it should be made clear to the decision maker how they should react and which other Local Plan policies, SPDs and guidance apply as per NPPF paragraph 16d and 20d. Ideally this is best achieved through one policy for each opportunity area which specifically sets out the main criteria and parameters for that land. Robust site specific policies will help to articulate the vision for each opportunity area, setting out the means to improve connectivity, legibility, and ones experience of historic places, and help to ensure the key design and heritage principles are employed consistently and to a high quality. It would also help the Council to meet Paragraph 185 of the NPPF which requires Local Plans to set out a positive strategy for the historic environment.

We request that you review the wording for these policies again; identifying which heritage assets (or their settings) would be affected by the proposed development. Where a potential impact is identified, wording should be included in the policy and supporting text to this effect. This wording should incorporate the design principles set out in Chapter 6 of the Plan, and should include/draw on/reference, where relevant the Archaeological Character Zone by Archaeological Character Zone recommendations set out in Appendix 3 of the Council's Development & Archaeology supplementary planning document (SPD) (November 2018), as well as the Council's Urban Character SPD. This will make it clear to developers how they are expected to respond to the varied and often complex heritage issues which have been identified, and ensure a unified design response to avoid any sense of piecemeal and un-co-ordinated development. It may also be beneficial to elevate the Development Options plans (i.e. those illustrating the development options and design guidelines) from chapter 6 into the policies to ensure that they are given adequate weight in the decision-making process. Without this information the policies as drafted are not effective and therefore unsound.

## Other allocations sites with heritage issues

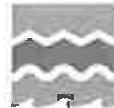
We draw your attention to the land allocated for future housing growth & associated infrastructure improvements known as ISPA4.1. This site includes the Grade II Listed Everton School Westerfield House in the north-western portion of the site, and is adjacent to/within the wider setting of other Grade II Listed buildings, notably Allens House, and Laceys Farmhouse which lie just outside the allocation boundary to the east. Development will need to preserve and where possible enhance these assets and their settings where this setting contributes to their significance. Given the proximity of these assets we would expect to see a Heritage Impact Assessment



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prepared to inform the redevelopment of this area. This document will need to assess the contribution which this land makes to those elements which contribute towards the significance of the heritage assets (designated and non-designated), and determine what impact its development might have upon their significance. Any specific measures required to remove or mitigate any harm to these assets should then be included in a site specific policy for ISPA4.1.

#### **Policy CS4: Protecting our Assets**

We welcome the changes to criterion 3 regarding the Council's commitment to a local list in policy.

#### **Policy DM15: Tall Buildings**

We welcome the changes to Policy DM15, but request that criterion 'i' is amended to read:

*Preserves strategic and local views, with particular reference to the settings of conservation areas, listed buildings, scheduled monuments, and other heritage assets, and the wooded skyline visible from and towards central Ipswich.*

We remain concerned that the tall building arc identified on the IP-One Policies Map still includes a significant area within the setting of the Grade I Listed Willis Building. Designed by Norman Foster in 1970-71 as a headquarters for global insurance broker Willis, Faber and Dumas (known as Willis in 2012), it is exceptional as the first large, multi-level building by one of Britain's most significant modern architects hailed internationally shortly after completion and recognised by architectural awards. One of its most striking features is its curvilinear glass curtain walling that reflects the surrounding buildings. Any new tall building therefore has the potential to impact on the setting, and therefore significance of this important building, and on this basis we advise pulling back the arc boundary in the immediate vicinity to avoid these potential impacts. Our Tall buildings advice note provides more information on taking an informed approach to tall building policy writing, using understanding of local character, distinctiveness and the significance of heritage assets, as well as pertinent issues. You can access it by following the link below:

<https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>

#### **Policy DM13: Built Heritage and Conservation**

We note the changes to this policy following our Regulation 18 advice.



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## Policy DM14: Archaeology

We welcome the changes to this policy following our Regulation 18 advice.

### Conclusion

Please note that absence of a comment on a policy, allocation or document in this letter does not mean that Historic England is content that the policy, allocation or document is devoid of historic environment issues.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Yours sincerely,

Andrew Marsh  
Historic Environment Planning Adviser, Planning Group



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**Felicia Blake**

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**From:** Oliver Holmes  
**Sent:** 02 March 2020 20:46  
**To:** PlanningPolicy  
**Subject:** Ipswich Core Strategy and Policies Development Plan Final Draft Consultation  
**Attachments:** consultation 1.doc; Continuation Sheet 1.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs,

I enclose my consultation response. Please acknowledge in due course.

Regards,  
Oliver Holmes

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

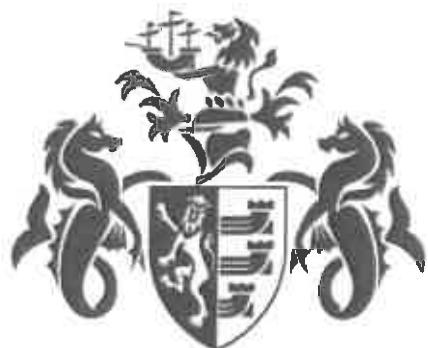
**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:

[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Core Strategy and Policies Development Plan Document Review – Final Draft</b>
<b>Please return this comments form to:</b>	<b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b> <b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b>
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b> <b>Part B – Your comment(s).</b>

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	Mr	
<b>First name</b>	Oliver	
<b>Last name</b>	Holmes	
<b>Job title (<i>where relevant</i>)</b>	-	
<b>Organisation (<i>where relevant</i>)</b>	Ipswich Liberal Democrats	
<b>Address (Please include post code)</b>		
<b>E-mail</b>		
<b>Telephone No.</b>		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Oliver Holmes, Ipswich Liberal Democrats
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Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
CS6.7 The Vision	<b>To be sound, reference needs to be made to the Government's net zero 2050 policy together with reference to IBC's Climate Emergency Declaration July 2019. This needs to be an overarching policy vision over the whole of the Core Strategy. Failure to do so could make the CS unlawful.</b>
CS6.8.4 and 5	<b>Development in itself is unlikely to achieve any reduction in carbon emissions (unless it is a form of carbon sink, for example). The Objective should be re-written so that permitted development will not add to carbon emissions.</b>  <b>To be sound, reference also needs to be made to air quality/pollution and the need for development not to add further to poor air quality in existing and potentially new Air Quality Management Areas.</b>
CS6.8.6	<b>Throughout the Draft, reference is made to significant modal shift to achieve sustainability. However, although this policy has been in existence for some years, no evidence is given as to any modal shift having taken place. As modal shift is not occurring under existing policy (almost certainly as a result of both lack of initiatives and disincentives), continued reference to such shift could be seen as disingenuous. The Objective needs to be re-written to provide initiatives and disincentives to developers.</b>
CS6.17	<b>Any development in Humber Doucy Lane must not take place until the Garden Suburb is substantially completed. "Appropriately phased" is too open-ended. To be sound, and to enable completion of the Garden Suburb, no development should occur before a trigger point of 3,200 completed homes.</b>

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
CS8.18	<b>Although improved infrastructure is stated to be essential for sustainable growth, there are no viable transport solutions offered. Such schemes are unlikely to be achievable as planning gain through development. The Draft is therefore unsound and needs to be re-written to include sustainable options.</b>
Policy CS1.	<b>This policy needs to be re-written to be compliant with UK Government policy on climate change. Net zero by 2050 is an objective above the NPPF. All development in Ipswich must be at or close to net zero by 2036 otherwise the 2050 target cannot be achieved.</b>
Policy CS5	<b>Although improving accessibility is recognised, it has to be borne in mind that the vast majority of journeys into and through Ipswich are by car and there is no objective for limiting or reducing car transport. It is entirely likely that accessibility will decrease over the plan period. (*see additional sheets)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**  yes

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**  yes

**Adoption of the Ipswich Local Plan Review.**  yes

### PRIVACY NOTICE

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the

creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

## Continuation Sheet 1 - Oliver Holmes

**Policy CS8.137:** Given the percentage of affordable housing in existing permissions of 5% and 4% for nearly 2000 houses, a target of 31% for the whole site of 3500 dwellings is not achievable. A more realistic percentage needs to be given.

**Policy CS16 (and DM 5):** A problem exists within Ipswich over sports grounds which can be illustrated by the grant of planning permission for residential development at Ipswich Sports Club in Henley Road. The hockey pitch was deemed inadequate and has been relocated elsewhere enabling potential development to take place. Although there could be shown at that particular time that the pitch was not needed, this facility was lost to this area of the town in perpetuity. Needs and fashions for sport facilities change over time, but, once the land is lost, there is no flexibility. Assessing need for Green Infrastructure, Sport and Recreation should take account of future residents and changing desires and habits of the residents over time. The Draft does not do this.

**Policy CS17:** Financing infrastructure through developer contributions is difficult in Ipswich as net profit margins are low and contributions are challenged by developers on viability grounds. For example, Ipswich Garden Suburb required a grant of £9.8 million from the Housing Infrastructure Fund in order to proceed. The Draft needs to reflect this difficulty otherwise it is unsound.

**Policy CS20:** As mentioned above, Transport in Ipswich is an area of weakness. The Upper Orwell Crossings and Ipswich Northern Route were abandoned in 2019 by Suffolk County Council. There is no evidence that Suffolk will provide any major infrastructure during the plan period. In these circumstances, all development in Ipswich will add to existing congestion within the town with no reductions in carbon and an increase in pollution and AQMAs. This makes the Draft unsound on a fundamental level. An argument can be made that no major development should take place which would increase traffic until an effective town wide mitigation strategy has been put in place.

Reference to Park and Ride schemes is aspirational. There is no evidence that Suffolk CC or Ipswich BC will fund them.

**Policy DM1:** To be sound, this policy needs to be re-written to take account of the national zero carbon target of 2050. Although carbon for new builds will be less than under previous standards, the level of emissions under this policy will still increase during the plan period. The default position should be zero carbon.

## Continuation Sheet 2 – Oliver Holmes

**Policy DM2:** This policy should apply to all new build and not just 10+ residential or 1000sqm + commercial.

A 15% target is unlikely to be lawful under the net zero 2050 national objective and should be increased.

It also fails to take into account national policy on prohibiting gas boilers after 2025.

Extensions to residential property (including permitted development) will need to be compliant.

The policy should make it clear that permission will be refused unless it is compliant.

**Policy DM3:** Poor air quality in the five AQMAs in Ipswich is a result of road traffic – particularly NO2 and NOX. Mitigation needs to include a restriction on operational parking in commercial development. All new residential development needs to include significant contributions towards sustainable transport options.

The previous draft mentioned that modelling showed emissions in AQMAs were likely to increase and more AQMAs declared during the plan period. This cannot be allowed to happen.

**Policy DM16:** This needs to include a reference to zero carbon, as mentioned above.

**Policy DM21:** See comments on CS20 and DM3 above.

**Site Allocations – Policy SP17:** Town centre car parking generates car trips and is a significant contributor to carbon, and other, emissions within the town centre. Availability of parking is a disincentive to modal shift and more sustainable travel options. In order to be compliant with national zero carbon objectives, the Draft needs to acknowledge that car parking is material in an overall assessment of carbon emissions and the overarching objective of reducing carbon emissions. Reference to national policy and the Ipswich Climate Emergency needs to be made.

**SP17 is based on a flawed 2019 Parking Strategy:**

1. The Strategy does not acknowledge any contribution to carbon reduction that reduced car trips into Ipswich could make.
2. An assumption is made for modal shift of 10% of trips by the end of the plan period without any evidence.

### **Continuation Sheet 3 – Oliver Holmes**

- 3. No analysis is made of the number of long stay places in the Princes Street area which are used by train commuters or the origin of these trips which are likely to be from outside Ipswich. Such commuters provide very little if any economic benefit to Ipswich which may offset or mitigate the carbon and other pollution they cause.**
- 4. The Strategy assumes temporary car parks will disappear during the plan period without any evidence. Many of these car parks are of long standing and it seems likely the owners find them more profitable than redevelopment. If they are refused extensions of planning permissions after additional permanent parking in multi-storeys is provided, there is no certainty they will be refused permissions on appeal under economic arguments under the NPPF. Further, where they are located in areas not served by the three allocated sites, they have additional grounds of appeal. There is therefore a risk that additional car parking spaces will be provided through the new allocations without any decrease in existing temporary sites.**
- 5. The Strategy must be linked to a comprehensive and sustainable transport strategy for Ipswich.**
- 6. Temporary and long stay parking needs to be better differentiated in the Strategy. Economic grounds for shopping trips are greater than for commuter parking – which makes up the majority of existing spaces.**
- 7. No analysis is made in the Strategy as to the reasons park and ride schemes in Bury Road and potentially Nacton Road are not currently financially viable. Suffolk CC have stated that the major reason is the availability of cheap commuter parking within the town centre. Significant on-street commuter parking in the north and south of the town centre is not quantified.**
- 8. The contribution of emissions from drivers using the existing and proposed car parks towards poor air quality in the AQMAs is not quantified.**

As Ipswich BC is the owner of at least two of the allocated sites for multi-story car parks, there must be a suspicion that fee income is a driver of the Strategy rather than planning policy.

Until a proper analysis of car parking and its contribution to carbon and other pollution is made, no sites for multi-storey car parks should be allocated.



Sent by email to: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

01/03/2020

Dear Sir/ Madam

**Response by the Home Builders Federation to the consultation on the Ipswich Local Plan Review**

1. Thank you for consulting the Home Builders Federation (HBF) on the final draft of the local plan review. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

**Cross boundary strategic policies**

2. It would appear from the Council's evidence that they have co-operated effectively with neighbouring authorities to plan for housing needs across the Ipswich Strategic Planning Area (ISPA). Growth expectations are set out clearly in Policy ISPA1 and we would agree that based on the standard method the minimum number of homes to be delivered in the areas is circa 35,000 between 2018 and 2036. However, we cannot comment on whether this has translated into effective joint working regarding the cross-border infrastructure and sites issues set out in ISPA2 and ISPA3. It will be important that the Council can show that the cross-boundary issues concerning the deliverability of those sites in ISPA4 which will meet a considerable portion of the ISPA's housing needs will be addressed by the Council and the relevant agencies.

**Policy CS1: Sustainable development.**

**The policy is unsound as it is not consistent with national policy**

3. When the presumption in favour of sustainable development was first introduced the Planning Inspectorate (PINS) recommended that a policy reflecting this approach should be included in all local plans. This approach is no longer considered necessary by PINS and they have rescinded their original advice on this matter. Given this position and the fact that paragraph 16(f) of the National Planning Policy Framework (NPPF) states that policies in local plans should serve



a clear purpose and avoid any unnecessary duplication we would suggest this policy is deleted.

#### **Policy CS7: The amount of housing required**

The policy is not sound the housing requirement and stepped trajectory has not been justified

##### Housing requirement

4. Paragraph 55 of the 2019 NPPF states that the Council should establish a housing requirement figure for their whole area. The starting point for establishing this requirement is the local housing needs assessment calculated using the standard methodology. Using this methodology, we would agree with the Council that the minimum number of homes required to be provided for by the Council is 8,010 units between 2018 and 2036. However, it is also important to note that this is the minimum number of homes that should be provided. National policy and guidance recognise that there may be circumstances where the local planning authority may want to plan for the delivery of more homes than the local housing needs assessment. These circumstances are set out in paragraph 2a-010 and 2a-024 of PPG.
5. Firstly, 2a-010 of PPG outlines that Councils may need to plan for a higher housing to deliver growth strategies, where strategic infrastructure projects are likely to drive an increase in homes locally or there is an agreement to take unmet needs from a neighbouring authority. It is evident from the local plan that Ipswich are seeking to support economic growth with a drive to support at least 9,500 additional jobs and infrastructure improvements to facilitate that growth. However, we are concerned that this desire for growth is not being matched by the Council's decision to adopt a housing requirement that is below previous assessment of need with regard to economic growth. It is noted that the 2017 SHMA estimated that to meet expected job growth in Borough would require 11,220 homes to be provided between 2014 and 2036. This equates to 510 dwellings per annum (dpa) during the plan period significantly higher than the 445 dpa being planned for through the draft Local Plan.
6. The Council consider the issues of such uplifts in their Housing Topic Paper but reaches the conclusion at paragraph 26 that housing supply in general will increase within the IPSA as other authorities will be required to deliver more homes using the standard method. The implicit suggestion would appear to be that any additional growth required to support the economic growth of Ipswich will be covered by additional delivery elsewhere. However, there does not appear to be any assessment as to whether this will be sufficient and provided in appropriate locations to support the economic and job growth aspirations of Ipswich. Whilst we recognise that Ipswich's tight boundary constrains the Council's ability to promote significant levels of additional growth in its own area, the need to support its economic aspirations close to where new jobs will be created should have been

considered with a view to seeking the delivery of additional homes elsewhere in the ISPA.

7. Secondly, paragraph 2a-024 of the PPG states that an increase in the total housing figures may be considered where it could help deliver affordable housing. The Council recognise in paragraph 8.151 affordable housing need is 239 dpa, around 48% of their requirement and as such they will not meet all of their need for affordable housing. Consideration should have been given with the other authorities in the ISPA whether more sites could be allocated elsewhere in the ISPA to meet the affordable housing needs of Ipswich.

**Stepped requirement**

8. Part c of CS7 includes the Council's proposed stepped requirement of 300dpa for 2018-24 and 518dpa for the remaining period of the plan. Whilst we agree that the proposed requirement for the plan period represents the minimum number of homes to be planned for, we are concerned about the approach taken to the stepped requirement. Whilst the latest PPG makes provision for the adoption of such steps, their use and the way it is applied must be justified. In too many cases the step is required on the basis of the strategy chosen by the Council not on the basis that there were no other options available to the Council to ensure a more consistent delivery across the plan period. We recognise that Ipswich is a tightly constrained area and as such has more limited opportunities to meet needs. In this regard we would not disagree with the Council's justification to include a stepped trajectory.
9. However, we do not agree with the steps proposed. The aim would appear to be to set a modest target in order to provide the Council with a substantial buffer over the first years of the plan. This approach is not sufficiently challenging and is more likely to lead to the whole plan under-delivering. We would suggest that the requirement closely follows the delivery expectations of the Council in order to provide the necessary incentive to maintain supply and press forward with the approval of planning applications and the delivery of development. We would therefore suggest the following two stage stepped requirement:
  - 2018/19 to 2019/20 – 300
  - 2020/21 to 2023/24 – 375
  - 2024/25 to 2035/36 – 493
10. This would ensure the Council can maintain a five-year land supply on adoption whilst also ensuring a challenging requirement ensure the Council provides timely support for development across Ipswich.

**Housing supply**

11. We welcome the Council's decision to include a 10% contingency within its housing supply to ensure that housing needs are met in full. This contingency would appear to be supported within the Council's housing supply estimates with identified supply being 17% above the Council's housing requirement.

12. On the basis of the Council's stepped requirement and the supply trajectory as set out in the Housing Topic Paper the Council would appear to have a five-year housing land supply on adoption of the local plan. However, it is not evident as to which sites, either extant permissions or local plan allocations, form the basis of supply within the first five years of the plan as neither the SHLAA nor the Topic paper provide the necessary detail. The most up to date evidence we can find providing a detailed assessment of supply is on table 18 of the latest annual monitoring report. However, this table is not consistent with the chart provided at paragraph 28 of the Housing Topic Paper. It will be necessary for the Council to provide a detailed site by site assessment of delivery across the plan period to ensure the Inspector and those commenting on the plan have a good understanding of the delivery expectations. This is particularly important with regard to the five-year housing land supply given the amended definition of deliverable within the 2019 NPPF which outlines that if major development is to be considered deliverable within five years it must:
  - Be allocated for development, has a grant of permission, or is identified on a brownfield register; and
  - There is clear evidence that housing completions will begin on site within five years.
13. Until such evidence is provided, we cannot comment as to whether the Council's position is robust and as such, we reserve the right to comment on this issue as part of the examination of the local plan.

#### Recommendations on CS7

14. In order to make the plan sound the Council will need to:
  - Justify why they have not considered a higher housing requirement that better meets their jobs growth assessments and affordable housing needs. Whilst we recognise that Ipswich is constrained the Council should have looked to secure additional provision within neighbouring areas;
  - Set a more challenging stepped trajectory that is more closely linked to expected supply; and
  - Provide evidence as to the delivery rates for the specific allocations and other sources of housing supply within the local plan to ensure these can be scrutinised effectively.

#### **CS12 Affordable housing**

##### The policy unsound as it is not consistent with national policy

15. Policy CS12 states that affordable housing provision outside the Ipswich Garden Suburb and Humber Doucy Lane should be at least 15%. The requirement should be set at 15% and not be considered to be the lower end of a potentially higher requirement. Policies, as set out in paragraph 16 of the NPPF need to provide clarity as to the expectations of the Council. Phrases such as "at least" do not

provide the necessary clarity for either applicants and decision makers that is expected by paragraph 16 of the NPPF and should be removed from this policy.

16. The revised NPPF has changed matters significantly with the role for viability now being primarily at plan making stage. This is set out in paragraphs 34 and 57 of the NPPF with supporting guidance in paragraphs 10-001 to 10-019 of the PPG. Given the Government's position that decision makers can assume that policy compliant development is viable it is important that local policies take account of situations where development is more marginal.
17. We are therefore concerned that the viability assessment may have underestimated the level of abnormal costs that occur when developing brownfield sites. The Viability assessment includes such costs on all sites of £175,000 per net developable acre (roughly £430,000 per net developable hectare). However, work undertaken by the HBF for the viability assessment of the Durham Local Plan indicated that this averaged, on the four PDL sites tested, £711,000 per net developable hectare. We recognise that this evidence is not directly relatable to development in Ipswich but it does provide an indication as to the potentially very tight margins on development in the Borough. Given the Viability Assessment shows that development of brownfield land is marginal the Council may need to consider a lower requirement on such sites, or amending other policy requirements in the plan, if it wants to maximise the delivery of such sites.

#### **DM7: Provision of private outdoor amenity space in new and existing developments**

*The policy is unsound as it is not consistent with national policy or justified*

18. This policy is too prescriptive as to the levels of open space that are required for homes within Ipswich. Whilst we recognise the importance of outdoor space it should be for the developer to decide the level of provision within each site. Housebuilders understand the market and the amount of open space that people expect and as such this policy needs to be rewritten to provide a greater degree of flexibility. It is also the case that Ipswich is a highly constrained authority and if the Council is seeking to set standards for open space within developments and meet its housing requirements it will need to offer flexibility within other policies such as the provision of private outdoor amenity space. We would suggest the following wording:

*"To ensure that new residential developments deliver a high quality and environmentally sustainable living environment, developments for houses and ground floor maisonettes will be required to incorporate well-designed and located private outdoor amenity space of an appropriate type and amount. When considering the provision of outdoor amenity space applicants should have regard to the need to meet other density and urban design requirements of the plan."*

*All private gardens and other outdoor amenity spaces should be safely accessible to occupants, designed to take advantage of sunlight and daylight and provide a functional space having regard to the mix of housing/types to be provided."*

#### **DM21: Transport and Access In new developments**

Part c is unsound as it has not been justified.

##### **Part c - electric vehicle charging points**

19. The HBF prefers a national and standardised approach to the provision of electrical charging points in new residential developments. We would like this to be implemented through the Building Regulations rather than through local planning policy. If the Council does choose to make policy in this area there are several issues that it will need to consider carefully.
20. We note that the consultation includes a requirement to include electric vehicle charging points on all new developments. Firstly, the policy lacks clarity as it does not state the amount of charging points that should be provided. The NPPF requires that any policy, including a requirement for charging points, should be clearly written and unambiguous (para 16). The policy will need to specify the quantum and type of provision sought either AC Level 1 (a slow or trickle plug connected to a standard outlet) or AC Level 2 (delivering more power to charge the vehicle faster in only a few hours) or other alternatives.
21. The Council's work should be supported by evidence demonstrating the technical feasibility and financial viability of these requirements. The Council must justify any requirement by including confirmation of engagement with the main energy suppliers to determine network capacity to accommodate any adverse impacts if all, or a proportion of dwellings, have charging points. We argue this because if re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables. This might mean that new sub-station infrastructure is necessary increasing the cost of provision. There may also be practical difficulties associated with provision to apartment developments or housing developments with communal shared parking rather than houses with individual on plot parking.

##### Recommendation

22. Without the necessary justification and clarity, we would suggest that part c is deleted.

#### **DM22 - Car and Cycle Parking In New Development**

This policy is unsound as it is inconsistent with national policy

23. The policy states that they will require adopted standards for car and cycle parking to be complied with. However, it must be noted that these standards are not set out in the local plan but in supplementary guidance. We are concerned that such standards, which are issues of policy as they can be used to refuse an application if they are not met, being set out in guidance and not the plan itself. Legislation is clear that policy issues must be set out in local plans. This is to ensure that should these standards change then appropriate consultation and public scrutiny of these changes is undertaken.

Recommendation

24. Two options are open to the Council, they can either include the standards as an appendix in the local plan or state in policy that development will need to have regard to the standards.

**Conclusions**

25. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, in the following key areas:

- Policy CS1 repeats national policy and is therefore inconsistent with paragraph 16 of the NPPF;
- The housing requirement seeks to meet minimum needs however we are concerned that this may not address the jobs growth expected in Ipswich and will not address affordable housing needs;
- The proposed steps within the stepped requirements are not justified and should better reflect delivery expectations;
- We could find no evidence on the delivery trajectories for specific allocations and other sources of supply have been provided in the evidence base;
- The viability evidence indicates that the majority of brownfield development at the proposed affordable housing rates would be marginal at best;
- The private outdoor space requirements are insufficiently flexible;
- The policy on electric vehicle charge points lack clarity and is not justified;
- That parking requirements must be included in the plan or, if not, the policy should be amended so that development only has to have regard to these standards.

26. We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



**Mark Behrendt MRTPI**  
**Planning Manager – Local Plans**  
**Home Builders Federation**

**Felicia Blake**

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**From:** Daniel Hudson  
**Sent:** 24 February 2020 12:57  
**To:** PlanningPolicy  
**Subject:** Site Reference IPO10b Felixstowe Road

With regard to the proposals for Site Reference IPO10b Felixstowe Road, I would be very much in favour of such a change. Particularly for the portion of the site currently occupied by Ardent Hire Solutions.

The various named businesses that have operated from that land have seen a big increase in business over the years and as such have contributed to a large increase in noise at all times of the day, and sometimes night.

It is a wholly inappropriate location for such a business with the amount of foot traffic from both children heading to school and the more elderly heading to the doctors. Add to that the damage they continue to do to the road surface as they struggle to make the turn out onto the main road as the trailers "bottom out".

D. Hudson

Representations made in accordance with Regulations  
20 – In Alphabetical Order

## **Full Redacted Representations**

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Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

Your Ref:

Our Ref:

Ipswich Borough Council,  
Planning Policy,  
3W Grafton House,  
15-17 Russell Road,  
Ipswich,  
IP1 2DE  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

18 February 2020

Dear Sir / Madam

**Consultation on the Ipswich Borough Council Local Plan Core Strategy and Policies  
Development Plan Document Review – Final Draft for comments for the provision of Healthcare  
(2016- 2036)**

## 1.0 Introduction

1.1 Thank you for consulting Ipswich & East Suffolk CCG on the above comments for the provision of Healthcare for the Ipswich Borough Council Local Plan, Proffered Options (LP). This new LP will look at the major factors involved in producing sustainable, vibrant and flourishing communities via planning for the future. This LP looks at spatial strategies, economy, tourism, transport and many other factors that will have an impact in producing viability in production until 2036.

1.2 In reviewing the context, content and recommendations of the LP and its current phase of progression, the following comments are with regard to primary healthcare provision on behalf of Ipswich and East Suffolk Clinical Commissioning Group (CCG) and .

1.3 Comments on the wider impact of planned growth on all local Health services and Infrastructure needs to be co-ordinated through wider consultation with the health economy and CCG led forums established to inform the Sustainability and Transformation Plan for the locality. The implementation of the plan will result in extensive transformation to the way that health and care services are delivered, potentially including changes to the physical infrastructure.

## 2.0 Existing Healthcare Position in the Emerging Plan Area

2.1 The LP consultation covers the administrative area of and Ipswich Borough Council, with reference to the wider areas of Suffolk including Babergh and Mid Suffolk District Council's and Suffolk Coastal District Council

**2.2** Currently within the administrative area of Ipswich Borough Council, healthcare provision incorporates a total of 13 GP Practices (a number of which include health centres) and 2 branch surgeries, 36 pharmacists, 26 dental surgeries, 20 opticians, 1 Acute hospital and 6 clinics.

**2.3** These are the healthcare services that the LP must take into account in formulating future strategies.

**2.4** Growth, in terms of housing and employment, is proposed across a wide area and would likely have an impact on future healthcare service provision. This response relates to the impact on primary care services, secondary care services, community and mental health services.

**2.5** In terms of optimal space requirements to encourage a full range of services to be delivered within the community there is an overall capacity deficit, based on weighted patient list sizes<sup>1</sup>, within the 13 GP Practices and 2 branch surgeries providing services in the area.

**2.6** The CCG, Local Authorities and local stakeholders has begun to address Primary Care capacity issues in the area and currently have projects to increase capacity underway across the Ipswich Borough Council area. These projects vary in size and will initially deliver additional capacity to meet previously identified growth requirements.

**2.7** Optimal space standards for primary care are set for planning purposes only. This allows us to review the space we have available and identify the impact development growth will have in terms of capacity and service delivery. As commissioners, we work closely with Practices to support their capacity needs and in line with policy changes and new models of care, an increase in footprint is not the only option to increase capacity, working across Primary Care Networks, practices are encouraged to utilise all Estate within their Primary care network patient catchment area. Other options include increasing Digital technology services and utilising community assets for services that do not require a specialist clinical environment. - there were no specific comments received from the NHS Trusts at this time.

**2.8** Upon review some existing health infrastructure will require further investment and improvement in order to meet the needs of the planned growth shown in this LP. The proposed growth scenarios contained within would have an impact on healthcare provision in the area and its implications, if unmitigated, may not be sustainable long term.

### **3.0 Identification and Assessment of Policies and Strategies that have Healthcare Implications**

**Below are comments on behalf of the following:**

- Ipswich & East Suffolk CCG
- East Suffolk and North Essex NHS Foundation Trust
- Norfolk and Suffolk NHS Foundation Trust
- East of England Ambulance Service NHS Trust

**3.1 POLICY ISPA2 Strategic Infrastructure Priorities** – The CCG is very happy to see that health provision is identified as key infrastructure and will work with the council and alliance partners in providing holistic healthcare for the residents of Ipswich.

**3.2 POLICY ISPA4 Cross Boundary Mitigation** – Any areas of cross boundary developments, health would be looking for developer contributions from the LPA of the development even if the infrastructure is located within a different LPA. The agreement to work with East Suffolk Council will make requesting cross boundary mitigation easier and this is welcomed by the CCG. The development area near Humber Doucy Lane is within the catchment area of Two Rivers Medical Centre and the CCG anticipates that primary care provision would be prescribed here and subsequently negate the need for primary health being located near the area.

**3.3 POLICY CS2 The Location and Nature of Development** – Designing developments in such a way that encourages the use of more sustainable modes of transport to get to community infrastructure is welcome and will help in the NHS preventative aspirations being obtained.

**3.4 POLICY CS5 Improving Accessibility** – The accessibility of infrastructure is a key factor in designing a development that is aimed at meeting environmental and health objectives. Despite the desire to have all community infrastructure within easily accessible locations, it might not always be possible for health but this does not mean that community space could not be accessible to provide community healthcare services on an ad hoc basis.

**3.5 POLICY CS8 Housing Type and Tenure** – The CCG and Alliance partners would be willing to be involved in any discussions involving assisted living and residential care homes. This area of development puts strain on all healthcare providers in the area and being involved in discussions from the earliest stage possible will help primary, secondary, community and mental health care mitigate the impact.

**3.6 POLICY CS10 Ipswich Garden Suburb** – Despite the relatively large size of the garden suburb development, primary care will be provided for the new patients at both Two Rivers Medical Centre and the new health centre proposed at the Tooks Bakery site. Community health services might be provided closer to the development but discussions would need to be had with the Alliance partners.

**3.7 POLICY CS11 Gypsy and Traveller Accommodation** – The CCG will be happy to be involved in any proposed gypsy and traveller site discussions to ensure that the residents will be able to access primary care.

**3.8 POLICY CS16 Green Infrastructure, Sport and Recreation** – The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.

**3.9 POLICY CS17 Delivering Infrastructure** – S106 is very important when providing health infrastructure and up until recent this has just been accessible to primary care providers through the CCG. NHS England has now provided instructions that all health providers should be looking to request mitigation through S106 or CIL as part of the planning application response process. As part of this process, developments over 250 dwellings will automatically go to the Alliance partners in health for them to make representation and request mitigation. The inclusion of GP surgeries and health centres as key strategic infrastructure is to be commended as this will allow the CCG to strategically plan ahead with the understanding that providing the business case is sustainable it will more likely get approval.

**3.10 POLICY CS19 Provision of Health Services** – There were no specific comments received from the acute trust (ESNEFT) at this time. The support of primary care infrastructure is very welcome and the CCG will always provide facilities that meets the needs of patients but due to a number of factors adhering to the policy of building near the town centre, district or local centre will be difficult. GP surgeries have catchment areas and these might be in conflict with your district or local centres. Primary Care Networks (PCNs) are being introduced to provide a variety of services through a number of surgeries working together and this could influence the location of any new health facility.

Chapter 8.229 There were no specific comments received from the acute trust (ESNEFT) at this time.

Chapter 8.230 There were no specific comments received from the acute trust (ESNEFT) at this time.

Chapter 8.231 As participants in the Ipswich and East One Public Estate (OPE) the platform is available to make sure that all public buildings are fully utilised. Aside from OPE all of the local health partners meet as part of an Integrated Care System (ICS) and the re-use of sites no longer required by a provider is discussed and only after extensive study would a building be permitted for non-public uses.

Chapter 8.232 The CCG does have plans and work is ongoing regarding provision of primary care in and around Ipswich. A number of feasibility studies are currently taking place with the goal of finding an estates strategy for Ipswich that covers the period of the plan. These feasibility studies are being produced with the support of the OPE and it is hoped that whatever strategy is adopted, the LPAs will support it.

**3.11 POLICY DM5 Protection of Open Spaces, Sport and Recreation** - The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.

**3.12 POLICY DM6 Protection of Open Spaces, Sport and Recreation Facilities** – The proposal to request non-residential developments of 1000 sq. m floor space or more to include facilities for employees is to be applauded. The NHS is looking at preventative measures to reduce the number of people requiring medical help and initiatives like this will help to promote health and wellbeing.

**3.13 POLICY DM12 Design and Character** – Designs that have a multi-functional use in a commercial or community building could help provide the flexibility required to deal with future demand whichever form this might evolve. NHS organisations are beginning to design buildings with this multi-functionality in mind so that rooms can be accessed by multiple organisations, each performing a different service. The CCG welcomes the importance attributed to open spaces in the LP and is encouraged to see the health factors being taken into account as well as the environmental benefits.

**3.14 POLICY DM24 Protection and Provision of Community Facilities** – The CCG along with Ipswich Borough Council will be looking at short term, medium term and long term strategies for primary care. As part of this, the aim is for all of the health providers in the area of Ipswich to provide an Infrastructure Delivery Plan (IDP). This document will allow all of the interested parties to work cohesively in identifying land and properties that are surplus to requirements and contrarily, if land acquisition could be required. This close working relationship will be key in this process working as effectively as it possibly can going forward.

It is important to remember that improved or newly created infrastructure, alone, will not fully mitigate the impact of development growth. Resource and revenue implications provide a very significant risk to the delivery of primary care services and we should continue to work together to identify ways in which sustainable health care services can be delivered and how development can contribute to healthy communities and the training and recruitment of health care professionals. Issues that are arising from the LP are listed in the table below with comments on behalf of Ipswich & East Suffolk CCG.

#### Issues arising from the Local Plan

Description of Issues	Primary Care Comments
Ipswich Garden Suburb. District & Local Centres including community buildings with integrated library facilities & police office (where required) alongside new health centre & reserved sites for community use.	NHS England are not dispensing new primary care contracts currently so the opportunities of establishing a new health centre in the Ipswich Garden Suburb are severely reduced. Mitigation for the increase in patients from the proposed Ipswich Garden Suburb will be spread between Two Rivers Medical Practice and the new healthcare facility at Tooks.
Cross-boundary issues	The possibility of issues arising from developments near to local authority boundaries with regards to healthcare provision is prevalent in the LP. The developments of Ipswich Suburb, continued development of Ravenswood and Whitton are examples of these possible cross boundary developments. Communication and cooperation will be vital in making sure that all appropriate stakeholders are aware of developments and mitigation can be sought in a timely manner. Cooperation will be required between the CCG, Ipswich Borough Council, Suffolk Coastal District Council and Babergh & Mid Suffolk District Councils to make sure that the land North of Ipswich which is designated as large development sites in both local authority local plans is accounted for in mitigating health.
Chapter 4.1 Duty to Cooperate	The CCG welcomes this statement and hopes that communication between Ipswich Borough Council and ICS partners will increase as we move through the planning stages.
Chapter 5.4 Deprivation Issues	Health care providers in areas of deprivation are under more pressure than those in areas where deprivation is lower. Due to the extra strain put on health providers in

	areas of high deprivation, morale and recruitment is lower than areas where the level of deprivation is less. Tackling areas of the highest levels of deprivation must be seen as a priority going forward as the resources required to provide health care in these areas is currently unsustainable.
Chapter 5.25 Managing the additional travel demands that growth will generate.	it is good to see that the benefits of health and wellbeing are being considered in initiatives not intrinsically linked to health. Creating a safe and sustainable link between new developments and areas of commerce and community is essential, be it via a well-lit walking path, cycle path or green corridors. The benefits to resident's wellbeing should not be overlooked as linking people that would otherwise be isolated can have a major benefit to mental health.
Chapter 5.26 Health and Wellbeing	As health care providers, we aim to provide health care facilities in a timely manner that is in line with the growth. The physical building of a health and/or social facility or improving one is relatively acquirable in most circumstances but there is currently a national shortage of NHS staff in both primary care and secondary care and that provides issues around capacity. LPAs can help aid recruitment by providing local communities that will attract NHS staff to them, by producing key worker housing in and around NHS campuses and facilities, encouraging commerce, designing and creating a vibrant and attractive community that people want to be associated.
Chapter 6.8 The Objectives	10. Community Facilities and Infrastructure – The CCG is undergoing a data gathering exercise for all primary care facilities in Suffolk with the aim of providing a 6-facet survey. The outcome of this project will be reliable data showing the CCG the general physical condition of all primary care facilities. Once this information is known the CCG will be in a better position to know which facilities require improvement and which facilities are in good condition.

3.11 The CCG (and NHS Trusts on developments over 250 dwellings) will have further comments to make as details of specific developments become available. In order to provide a more detailed response, a clearer understanding of phasing and anticipated trajectory will be required.

3.12 The provision of assisted living developments and residential care homes, although a necessary feature of care provision and to be welcomed, can pose significant impacts on local primary care provision and it is important that planners and developers engage at a very early stage with the CCG, to plan and implement suitable mitigations.

3.13 It is also important we continue to be consulted in relation to emerging Neighbourhood Development Plans in order to work with local communities to deliver and maintain sustainable healthcare.

#### 4.0 Conclusions

4.1 This response follows a consultation by Ipswich Borough Council.

4.2 In its capacity as healthcare commissioner, NHS England and the CCG have requested that the Local Planning Authority identifies policies and strategies that are considered to directly or indirectly impact upon healthcare provision and has responded with comments to help shape future policy.

4.3 NHS England has identified shortfalls in capacity at existing premises covered by the LP. Provision needs to be made within the LP to address the impacts of development on health infrastructure and to ensure timely cost-effective delivery of necessary infrastructure improvements, in the interests of pursuing sustainable development.

4.4 The recommendations set out above are those that NHS England and the CCG deem appropriate having regard to the projected needs arising from the Ipswich Borough Local Plan. However, if the recommendations are not implemented then NHS England reserves the right to make representations about the soundness of the plan at relevant junctures during the adoption process.

Yours faithfully

**Jane Taylor, Senior Estates Development Management, Ipswich & East Suffolk Clinical Commissioning Group**

cc:

Caroline Procter – Ipswich & East Suffolk CCG  
Daniel Turner – Ipswich & East Suffolk CCG  
Chris Crisell – Ipswich & East Suffolk CCG

**From:** Mike Hancock  
**Sent:** 26 February 2020 11:31  
**To:** Michael Hammond  
**Cc:** PlanningPolicy  
**Subject:** Re: Ipswich RFC - Land At Humber Doucy Lane, Ipswich IP4 3PZ

Dear Sir

**PROPOSED LOCAL PLAN SITE ALLOCATION**

**1P184b - Land at Ipswich RFC HUMBER DOUCY LANE IP43PZ**

In light of the recent notice regarding land allocation adjacent to Ipswich RFC, Humber Doucy Lane IP43PZ

I would like formally register comments of behalf of Ipswich Rugby Football Club and to request a meeting to discuss 2 specific points.

**1** The absence of land 1P184b in any allocation. This land is a driveway and a grassed playing area for youth and junior rugby. It also serves as overspill car parking on busy senior match days. It is not large enough for a full size pitch and is therefore only generally used by Under 11 & Under 12 years age groups).

**2** Replacement facilities for any loss of land currently used for playing and training by Ipswich RFC that abuts IP184b (part of land identified as ISPA4.1 in your most recent PROPOSED LOCAL PLAN SITE ALLOCATION

Please note that Ipswich RFC is now in its 150th year. It continues to serve the local rugby playing community including making provision for a growing interest in girls and women's rugby. It runs rugby for 11 age groups from under 6 through to under 18's. It runs 3 men's senior teams, a women's team and 2 fledgling girls age group teams. All sections of our club are growing.

The club already has a requirement for extra land to meet the demands being made upon it.

We currently lease land adjacent to IP184b to meet demand (as well as hiring an all weather floodlit facility nearby on a weekday evening as we do not have sufficient floodlit space at Humber Doucy Lane).

Ipswich RFC requires at least one more full size rugby pitch and an all weather floodlit facility plus 100-150 more hard standing car parking spaces to better meet the demands being made upon it.

Our clubhouse facilities are not at the required standard. We require additional changing room facilities and well as improved gender separation for changing rooms and disabled toilets.

In short we are bursting at the seams and struggling to meet the demands made upon us by the local rugby community due to the successful endeavours of dozens of volunteers.

**We do not wish to be omitted** from any land allocation with the view that any subsequent funds realised by land sale could greatly assist the club in better meeting the demands currently being placed on it. Moreover we are seeking to expand our offering to the local rugby community

should larger replacement playing facilities adjacent to our current pitches be made available or a new site identified.

We recognise that the majority of our land ownership falls within East Suffolk Council but we primarily serve the needs of Ipswich Borough Council residents.

We have had plans drawn up for a new clubhouse under guidance from the Rugby Football Union. We are also looking at a separate project with a phased extension/refurbishment of the existing clubhouse. However we seem to be in a permanent CATCH 22 situation of not knowing what may happen with land allocation for planning and find it difficult to make progress with any development plans.

Your acknowledgement of receipt of this e-mail would be welcome ahead of the consultation period end (1145 March 2nd 2020).

I would be obliged if a meeting could be arranged to discuss the contents of this letter and any broader issues that could help enhance Ipswich RFC's offering to the local community.

With kind regards

Mike Hancock  
Chairman  
Ipswich RFC

On Tue, 12 Mar 2019 at 10:15, Michael Hammond <[Michael.Hammond@ipswich.gov.uk](mailto:Michael.Hammond@ipswich.gov.uk)> wrote:

Dear Mr Hancock,

Thank you for your email regarding Ipswich RFC's land at Humber Doucy Lane. Apologies for taking so long to formally respond.

On behalf of the RFC you helpfully completed and returned the form we sent you regarding the RFC's land and confirmed that the draft site sheet assessment (January 2017) was accurate. This response was used to help inform our draft Strategic Housing and Employment Land Availability Assessment (SHELAA). A copy of your response is attached for ease of reference. A link to the draft SHELAA as published is available to view on the link below. The RFC land is identified under site reference IP184b (pages 166 – 167):

<https://www.ipswich.gov.uk/sites/default/files/draft strategic economic land availability assessment - jan 2019.pdf>

As you may be aware, Ipswich Borough Council is currently undertaking a review of its Local Plan to help guide development of the Borough to 2036. A consultation on the Preferred Options of the Local Plan commenced on 16<sup>th</sup> January and will end on 13<sup>th</sup> March.

As part of this process, the Council is required to identify potential sites that may be suitable for residential development over the Local Plan period. This is informed by evidence gathered as part of the SHELAA exercise. It is important to note that the identification of potential sites do not act as planning applications nor do they constitute planning permissions.

Under the preferred options Local Plan we are identifying a broad location at the northern end of Humber Doucy Lane that may potentially deliver appropriate residential development and associated infrastructure after 2031. Further information regarding this broad location for development can be found in the Core Strategy and Policies Development Plan Document under Policy ISPA4 (page 30). A link to this document and a link to the accompanying policies map can be found below.

[https://www.ipswich.gov.uk/sites/default/files/combined core strategy with a3 sheet review preferred options - clean 030119.pdf](https://www.ipswich.gov.uk/sites/default/files/combined_core_strategy_with_a3_sheet_review_preferred_options - clean 030119.pdf)

[https://www.ipswich.gov.uk/sites/default/files/local plan policies map ipswich - preferred options draft nov 2018.pdf](https://www.ipswich.gov.uk/sites/default/files/local_plan_policies_map_ipswich - preferred_options_draft_nov_2018.pdf)

This broad location covers the Ipswich RFC's land along with the adjoining land owned by Kesgrave Covenant and WO & PO Jolly (Ipswich) Ltd. At this stage, this broad location does not specify precisely which sites covered by this broad location may or may not be required to deliver development in this area.

It should be made clear that the proposals map and identification of the RFC's land as part of this broad location does not represent the land ownership status of this land nor any other parcel of land in the Borough. We fully acknowledge and are aware that part of the land within the broad location is within the ownership of the RFC.

The ISPA4 Policy states at criterion b that replacement sports facilities, if needed, will need to be included as part of the infrastructure requirements to deliver development in this location. Therefore, any development on the broad location that would affect the RFC facility would either need to retain the existing sports facility, provide a replacement facility or demonstrate that equal or greater provision is delivered at an alternative site.

In terms of notification as part of the Local Plan process we have now added you to our mailing list so you will receive notifications of all future documents which get published. If you wish to comment on the ISPA4 Policy please follow the instructions on the "How to Comment" section of the website below:

<https://www.ipswich.gov.uk/ipswichfuture>

In addition to the above, officers would welcome the opportunity to discuss the Local Plan process and understand your position if you would be open to this? Please let me know if so and we can arrange an appropriate date to meet.

Please let me know if you require any clarification on any of the above.

Yours sincerely,

Michael Hammond

**Michael Hammond**

Senior Planning Policy Officer

Planning and Development

01473 432905

[michael.hammond@ipswich.gov.uk](mailto:michael.hammond@ipswich.gov.uk)  
Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1 2DE

[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

[www.facebook.com/IpswichGov](http://www.facebook.com/IpswichGov)

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Fantastic venues for a range of events  
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For information about how Ipswich Borough Council processes personal data please visit  
[www.ipswich.gov.uk/privacy](http://www.ipswich.gov.uk/privacy)

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Mike Hancock  
Classic Hand Tools

+44 (0)1473 784983  
[www.classichandtools.com](http://www.classichandtools.com)

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Core Strategy and Policies DPD Site Allocations and Policies DPD Proposals Map</b>
<b>Please return this comments form to:</b>	<b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b>  <b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b>
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

#### **PART A PERSONAL DETAILS**

	<b>1. Personal details</b>	<b>2. Agent's details (If applicable)</b>
<b>Title</b>	Mr	Mr
<b>First name</b>	Paul	Matt
<b>Last name</b>	Wranek	Clarke
<b>Job title (where relevant)</b>	Bursar and Clerk to the Governors	Director, Head of Boyer Colchester
<b>Organisation (where relevant)</b>	Ipswich School	Boyer
<b>Address (Please include post code)</b>	c/o Agent	15 De Grey Square De Grey Road Colchester Essex CO5 4YQ
<b>E-mail</b>	c/o Agent	
<b>Telephone No.</b>	c/o Agent	

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Matt Clarke, Boyer (on behalf of Ipswich School)
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Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<b>Core Strategy and Policies DPD - Diagram 3: The Ipswich Key Diagram and Para. 7.2 (iv)</b>	<p>Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as "<i>Land Allocated for Sport Use</i>" on the basis that it is not required for this purpose.</p> <p>The release of the Ipswich School land at Notcutts Field, as part of the allocated Ipswich Garden Suburb is not currently considered viable and is therefore uncertain, whilst in any event the school owns other land that would provide suitable alternative land for replacement playing fields within the vicinity and has already invested significantly into new and improved facilities at its Rushmere St Andrew Sports Centre.</p> <p>Instead it is proposed that the site is allocated for residential development (21.81ha, with capacity for 500 dwellings).</p> <p><b>Please see accompanying letter for further details.</b></p>
<b>Core Strategy and Policies DPD – Policy CS2: The location and nature of development</b>	<p>Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), under CS2 (b), with suggested alternative reference to allocation of land off Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings).</p> <p>This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.</p> <p><b>Please see accompanying letter for further details.</b></p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
<b>Core Strategy and Policies DPD – Policy CS7: The amount of new housing required</b>	<p>Object to inclusion of land at the northern end of Humber Doucy Lane (ISPA4.1) within the land supply and replacement with reference to land west of Tuddenham Road, north of Millenium Cemetery (21.81ha, with capacity for 500 dwellings).</p> <p>Object to omission of any reference to the need for Inclusion of a 20% buffer to the 5 Year Housing Land Supply, in light of latest Housing Delivery Test information (2019 Measurement, released February 2020); to the need to also address the emerging delivery shortfall in this regard (77 dwellings within the first year); and also the need for increased focus on identification of sites that are deliverable in the initial 5 year period.</p> <p>It is also felt that the allocated sites component of housing supply should be increased on the basis that not all of the sites relied upon will be guaranteed to deliver within the Plan Period, having regard to the fact that a proportion of these have been allocated in the Local Plan since 1997 without having yet come forward, whilst others are reliant on the securing of alternative sites for relocation of existing uses in the first instance.</p> <p><b>Please see accompanying letter for further details.</b></p>
<b>Core Strategy and Policies DPD – Policy ISPA4: Cross boundary working to deliver sites</b>	<p>Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), in the context of Policy ISPA4, with suggested alternative reference to allocation of land west of Tuddenham Road, north of Millenium Cemetery (21.81ha, with capacity for 500 dwellings), albeit not necessarily therefore involving cross boundary working given containment within Ipswich Borough.</p> <p>This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.</p> <p><b>Please see accompanying letter for further details.</b></p>

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
<b>Site Allocations and Policies</b> <b>DPD – Site Ref:</b> <b>ISPA 4.1</b>	<p>Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), with suggested alternative allocation of land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings), albeit not necessarily therefore involving cross boundary working given containment within Ipswich Borough.</p> <p>This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.</p> <p><b>Please see accompanying letter for further details.</b></p>
<b>Site Allocations and Policies</b> <b>DPD – Omission Site</b>	<p>Object to omission of land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings) as a residential allocation.</p> <p>This is on the basis that the site is not required for relocation of sport use and would represent a sustainable residential development opportunity, able to take advantage of close proximity to the Ipswich Garden Suburb development through direct pedestrian and cycle connection, reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.</p> <p>The proposed site allocation could also offer additional flexibility of supply in light of concerns raised in our representations over the certainty with which allocated sites could be relied upon to deliver within the Plan Period.</p> <p><b>Please see accompanying letter for further details.</b></p>
<b>Proposals Map</b>	<p>Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as "<i>Land Allocated for Sport Use</i>" on the basis that it is not required for this purpose.</p> <p>The release of the Ipswich School land at Notcutts Field, as part of the allocated Ipswich Garden Suburb is not currently considered viable and is therefore uncertain, whilst in any event the school owns other land that would provide suitable alternative land for replacement playing fields</p>

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<p>within the vicinity and has already invested significantly into new and improved facilities at its Rushmere St Andrew Sports Centre.</p> <p>Instead it is proposed that the site is allocated for residential development (21.81ha, with capacity for 500 dwellings).</p> <p><b>Please see accompanying letter for further details.</b></p>

**Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.**

#### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

**Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.**

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

#### **PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

2<sup>nd</sup> March 2020  
Our Ref: MC

15 De Grey Square  
De Grey Road  
Colchester  
Essex  
CO4 5YQ

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
Suffolk  
IP1 2DE

Dear Sir/Madam,

**Re: Response to Public Consultation for the Ipswich Local Plan Review Final Draft  
(Regulation 19) on behalf of Ipswich School**

**1. Introduction**

- 1.1 These representations relate to land west of Tuddenham Road, north of the Millennium Cemetery and bounded by railway lines to the north and west (*centred on OS Ref 178 471*). The land in question, which measures 21.81 ha, is owned by Ipswich School, on whose behalf these representations are hereby made, and is currently in agricultural use. Please see contextual map within Masterplan document provided at Appendix 1, with the above site annotated as "*Proposed Residential Allocation*" alongside other relevant sites owned by Ipswich School that are referred to below.
- 1.2 The Ipswich Key Diagram (Diagram 3, p35 of Core Strategy and Policies DPD) shows the above site as "*Land Allocated for Sport Use*" and partially (northern portion) as "*Green Trail*" albeit on a diagrammatical illustration.. It is noted that the Draft Proposals Map also designates the site as "*Land Allocated for Sport Use*." The owners of this site wish to object to designation of this land for sport use on the basis that neither the need for such use has been fully evidenced, nor has the viability of creating such facilities been established.
- 1.3 The background to this designation relates back to allocation of the Ipswich Garden Suburb site in the Adopted Local Plan, which is indeed carried forward into this current review as part of the development strategy for the town (Policies CS2 and CS10). Within Policy CS10 it is stated that "*the land to the west of Tuddenham Road north of the railway line is allocated for the replacement playing fields necessary to enable development of the Ipswich School playing field site as part of the Garden Suburb development.*" This is elaborated upon within supporting text at Para. 8.135.
- 1.4 Ipswich School have consistently stressed that they would only release their land off Valley Road (known as Notcutts Field) if it were viable to do so, namely in respect of the costs of providing new facilities being met or exceeded by receipts from the sale of the site. As the

viability of relocation is by no means certain at this time, the assumption of relocation of sports facilities to land to the west of Tuddenham road is premature and has the effect of sterilising a viable housing allocation when another alternative site is available for sports facilities (see below).

- 1.5 Furthermore, in the event that the viability position were to improve in the longer-term, it is not considered that the allocated playing fields relocation site west of Tuddenham Road is definitively required in this context. This is because the School owns other land that would provide suitable alternative options in this regard. This includes land (extending to approximately 17ha) to the north of Westerfield, on either side of the B1077 (Westerfield Road).
- 1.6 This land is flat and level and therefore readily capable of accommodating the requisite sports pitches without being obtrusive in the surrounding landscape or giving rise to unacceptable amenity impacts, with scope to provide screen planting and off-set from any neighbouring residential properties. This site is located only marginally further away from the school than the Tuddenham Road site, and in fact closer than their Sports Centre facility at The Street, Rushmere St Andrew. Please see contextual location plan within Masterplan Document at Appendix 1, and specifically the site annotated as "***Alternative Playing Fields Site.***"
- 1.7 In this connection, it should also be noted that in recent years significant investment in sports facilities has already taken place at the Rushmere Sports Centre, including the creation of a number of all-weather pitches.
- 1.8 It is therefore felt that allocation of the land west of Tuddenham Road for replacement playing fields is unnecessary and unjustified, and that the site would be more appropriately allocated for residential development. By extension it is also evident that the basis upon which this site was assessed within the SHELA (January 2020) under Site Ref: IP183, as being considered suitable, yet unavailable and unachievable, was fundamentally flawed.
- 1.9 A Masterplan (see Appendix 1) has been prepared by Tate Harmer Architects which illustrates how development of land west of Tuddenham Road could be developed for residential use, with scope to accommodate up to 500 dwellings, and therefore comparable in scale to the Ipswich Borough element of the proposed cross-boundary ISPA 4.1 allocation. This applies many of the key design principles of the neighbouring Garden Suburb (as defined within the allocations policy and subsequent SPD), including the following:
  - Comparable dwelling size mix covering a varied range of 1-5 bed new homes;
  - A series of interconnecting linear green parks and green avenues with integral sustainable urban drainage system (SUDS) also providing ecology benefits;
  - In excess of 12% public open space (allowing for incorporation of SUDS);
  - Scope for community space/buildings;
  - Average net residential density of 32 dph;
  - Vehicle-free streets, adopting Home Zones approach;

- Vehicular access shown indicatively as being taken from two points along Tuddenham Road;
  - Suitable green buffers adjacent to railway lines (to north and west), with notable width to the north, respecting "Green Trail" designation shown on Key Diagram.
- 1.10 In promoting the availability and suitability of the Tuddenham Road site to come forward for residential development it is considered that its allocation could be robustly contemplated under a number of scenarios.
- 1.11 Firstly, it would be a preferable, more suitable and more sustainable alternative to the proposed allocation sites that comprise ISPA4.1. It is evident that the site west of Tuddenham Road is more closely related to the Ipswich Garden Suburb and therefore able to take better advantage of community facilities planned as part of that development, and indeed to supplement these through provision of further facilities. In this regard it should be noted that direct pedestrian and cycle access can be achieved between these sites by virtue of existing connection beneath the intervening railway line from the north-western corner of our client's site, the nature of which could be significantly enhanced to provide an attractive and convenient route. The location of this connection would link particularly well to the location of both the Secondary School and Primary School within this area of the Ipswich Garden Suburb scheme, as shown in the Adopted SPD.
- 1.12 This is in stark contrast to the ISPA4.1 allocation which would inevitably lead to access to such facilities being dependent on car use, or pedestrians having to cross Tuddenham Road.
- 1.13 It is also apparent that the ISPA4.1 allocation does not comprise a single site, but rather a series of separate and disjointed parcels that will not ultimately form a comprehensive new community. Inclusion of the Ipswich Rugby Club land is also likely to lead to a need for re-provision of land for yet more compensatory pitches.
- 1.14 Secondly, as set out at Para. 1.4 above, there is an element of uncertainty regarding the viability of releasing land at Notcutts Field (allocated as part of the Ipswich Garden Suburb), given the need to finance alternative sports facility provision. In the event that the site off Valley Road were therefore unable to deliver housing, the Tuddenham Road site would provide an effective and suitable alternative housing allocation.
- 1.15 Thirdly the site would provide either a suitable additional or alternative site in the context of concerns about the deliverability of other sites relied upon in the Plan, or in the event that additional supply is required more generally.
- 1.16 In this regard it is considered that a significant number of site allocations have been in place for some considerable time, yet have not to date come forward for development. Analysis of the proposed allocation sites in the Draft Local Plan Review which contain a specified indicative residential capacity reveals that a significant number of sites have been allocated for comparable uses since the 1997 Local Plan was adopted, but to date have failed to be delivered (either in part or in their entirety). There are some 8 sites for which this situation is apparent, as listed at Appendix 2 of this statement. The collective capacity from these sites totals 865 dwellings.

- 1.17 It is not necessarily advocated that these sites be de-allocated, given that the principle of their development remains appropriate. Rather it is suggested that a more cautious approach is taken to the likelihood of delivery being achieved within the Plan Period, noting that whilst a discount of 10% "slippage" has been applied to certain supply categories (sites with planning permission or resolution to grant) no such flexibility has been built in for allocation sites. This is further evident when regard is had to proposed allocation sites where explicit acknowledgement is given within the allocations schedule to the need for existing uses to be displaced and alternative sites found for these to be accommodated before development could proceed (sites IP003, IP011b, IP014, IP032, IP064a, IP066, IP119, IP120b).
- 1.18 Furthermore it is noted that within the Government's recently published Housing Delivery Test: 2019 Measurement data (13<sup>th</sup> February 2020) it was recorded that Ipswich Borough Council delivered 611 net additional dwellings over the preceding 3 year period against a requirement of 1,319 dwellings. This represents just 46%, and therefore only narrowly avoiding automatic application of the presumption in favour of sustainable development (which would have applied at anything below 45% for this current period). As a consequence the Borough are needing to apply a buffer of 20% to its 5 year housing land supply requirement.
- 1.19 It is not clear that this has currently been factored into the current land supply calculations, and indeed it is acknowledged that the above information was published after this consultation draft plan was prepared. This will however need to be rectified going forward, and whilst it is recognised that this need not necessarily affect the quantum of overall supply across the plan period, it does clearly require a focus on the identification of sites that are deliverable within the first 5 years. Regard will also need to be given to addressing the backlog in supply that has already arisen since the start of the plan period (77 dwellings during 2018/19, based on the stated 223 completions against the initial lower stepped requirement of 300 dwellings, with data related to 2019 performance awaited).

## **2. Specific Policy Comments and Proposed Alternatives**

- 2.1 In light of the comments set out above the following specific comments and objections are made on behalf of Ipswich School.

### **Core Strategy and Policies DPD -Diagram 3: The Ipswich Key Diagram and Para. 7.2 (iv)**

- 2.1.1 Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as "**Land Allocated for Sport Use**" on the basis that it is not required for this purpose.
- 2.1.2 The release of the Ipswich School land at Notcutts Field, as part of the allocated Ipswich Garden Suburb is not currently considered viable and is therefore uncertain, whilst in any event the school owns other land that would provide suitable alternative land for replacement

playing fields within the vicinity and has already invested significantly into new and improved facilities at its Rushmere St Andrew Sports Centre.

- 2.1.3 Instead it is proposed that the site is allocated for residential development (21.81ha, with capacity for 500 dwellings).

**Core Strategy and Policies DPD – Policy CS2: The location and nature of development**

- 2.1.4 Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), under CS2 (b), with suggested alternative reference to allocation of land off Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings).
- 2.1.5 This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.

**Core Strategy and Policies DPD – Policy CS7: The amount of new housing required**

- 2.1.6 Object to inclusion of land at the northern end of Humber Doucy Lane (ISPA4.1) within the land supply and replacement with reference to land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings).
- 2.1.7 Object to omission of any reference to the need for inclusion of a 20% buffer to the 5 Year Housing Land Supply, in light of latest Housing Delivery Test information (2019 Measurement, released February 2020); to the need to also address the emerging delivery shortfall in this regard (77 dwellings within the first year); and also the need for increased focus on identification of sites that are deliverable in the initial 5 year period.
- 2.1.8 It is also felt that the allocated sites component of housing supply should be increased on the basis that not all of the sites relied upon will be guaranteed to deliver within the Plan Period, having regard to the fact that a proportion of these have been allocated in the Local Plan since 1997 without having yet come forward, whilst others are reliant on the securing of alternative sites for relocation of existing uses in the first instance.

**Core Strategy and Policies DPD – Policy ISPA4: Cross boundary working to deliver sites**

- 2.1.9 Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), in the context of Policy ISPA4, with suggested alternative reference to allocation of land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings), albeit not necessarily therefore involving cross boundary working given containment within Ipswich Borough.

- 2.1.10 This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.

#### **Site Allocations and Policies DPD – Site Ref: ISPA 4.1**

- 2.1.11 Object to allocation of land at the northern end of Humber Doucy Lane (ISPA4.1), with suggested alternative allocation of land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings), albeit not necessarily therefore involving cross boundary working given containment within Ipswich Borough.
- 2.1.12 This is on the basis that land west of Tuddenham Road, north of Ipswich Millennium Cemetery would be more appropriate, better related to the Ipswich Garden Suburb development, and therefore more sustainable, by virtue of reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.

#### **Site Allocations and Policies DPD – Omission Site**

- 2.1.13 Object to omission of land west of Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for 500 dwellings) as a residential allocation.
- 2.1.14 This is on the basis that the site is not required for relocation of sport use and would represent a sustainable residential development opportunity, able to take advantage of close proximity to the Ipswich Garden Suburb development through direct pedestrian and cycle connection, reducing the need for travel by private car, improving pedestrian and cycle access and enabling a more consolidated and comprehensive form of development.
- 2.1.15 The proposed site allocation could also offer additional flexibility of supply in light of concerns raised in our representations over the certainty with which allocated sites could be relied upon to deliver within the Plan Period.

#### **Proposals Map**

- 2.1.16 Object to identification of land west of Tuddenham Road, north of Ipswich Millennium Cemetery as "**Land Allocated for Sport Use**" on the basis that it is not required for this purpose.
- 2.1.17 The release of the Ipswich School land at Notcutts Field, as part of the allocated Ipswich Garden Suburb is not currently considered viable and is therefore uncertain, whilst in any event the school owns other land that would provide suitable alternative land for replacement playing fields within the vicinity and has already invested significantly into new and improved facilities at its Rushmere St Andrew Sports Centre.

2.1.18 Instead it is proposed that the site is allocated for residential development (21.81ha, with capacity for 500 dwellings).

**3. Summary**

3.1 Should you have any queries on the matters raised within these submissions please do not hesitate to contact me. Ipswich School would be more than happy to discuss the opportunities presented by their site off Tuddenham Road in further detail.

Yours faithfully

**Matt Clarke  
Director, Head of Boyer Colchester**

## APPENDIX 1 – MASTERPLAN DOCUMENT

Boyer

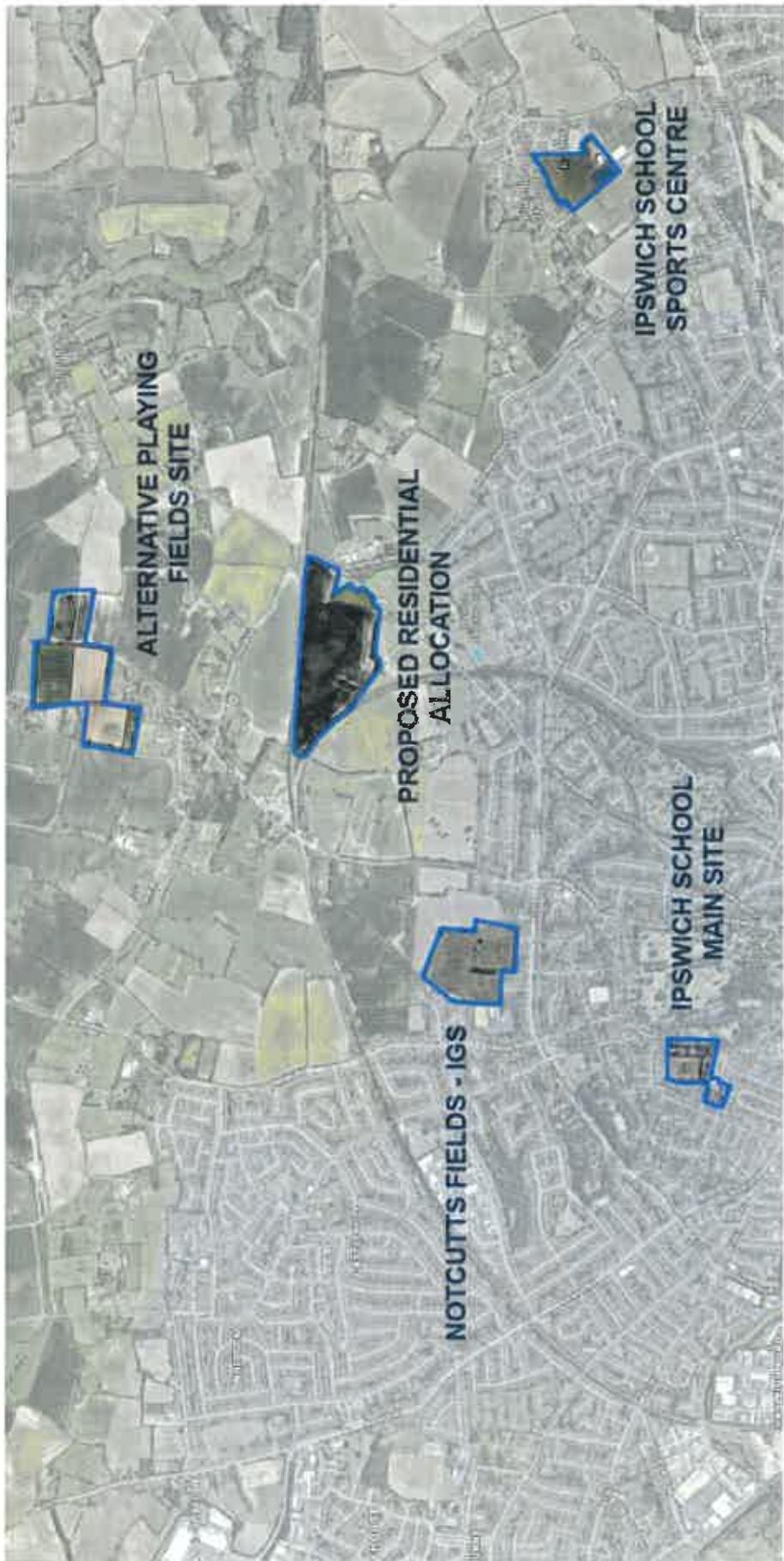


# Masterplan Proposal

Tuddenham Road, Ipswich

2nd March 2020

## 01 EXISTING SCHOOL LAND



Aerial view of existing school land

02 TUDDENHAM ROAD SITE



Aerial view of Tuddenham Road - red line denotes site boundary

### 03 EXISTING CONTEXT



Chelaworth Avenue - local example of green streets

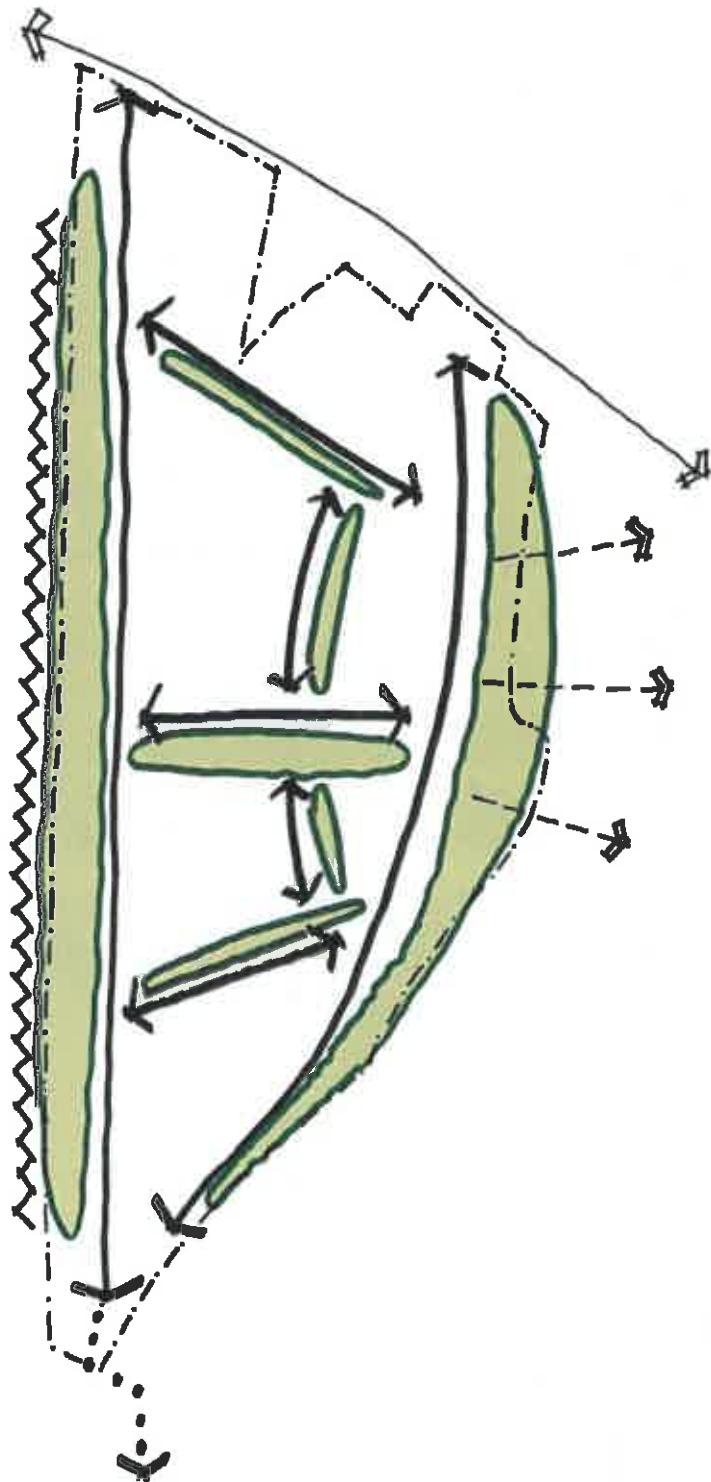


Local Wellness Clinic on Tuddenham Road



Local cottage house typology on Tuddenham Road





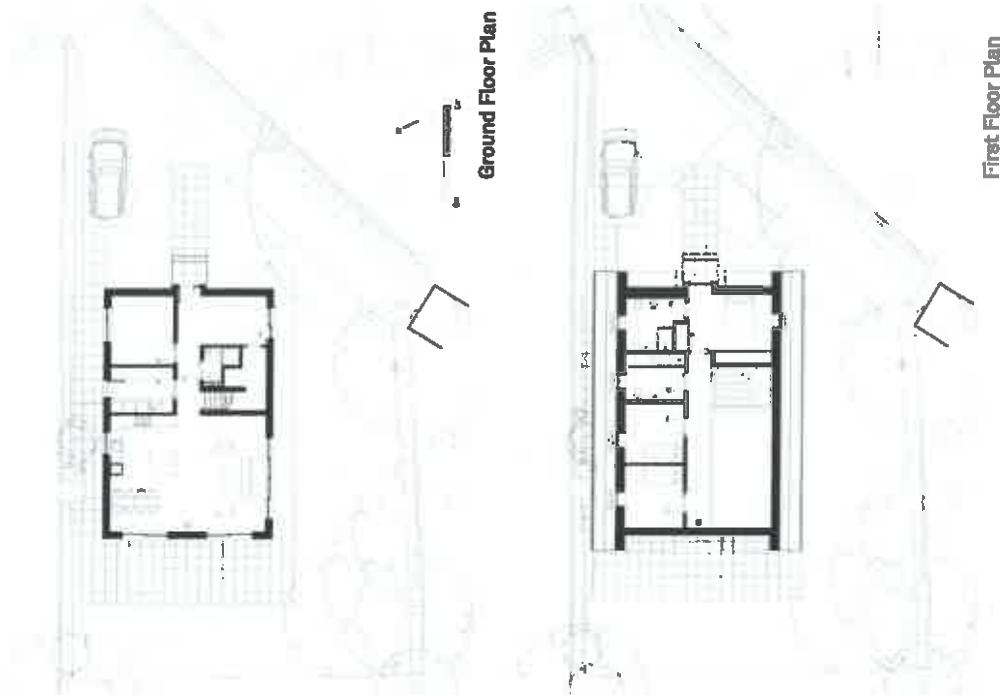
#### Primary Movement & Green Avenues

Large green buffer zones along the north and south boundary will create open public spaces with green avenues connecting across the site. A central linear park running north to south will act as a community spine to the masterplan, allowing for recreational activities and a link to a site wide sustainable urban drainage system. These green spaces will improve water conservation, the public's health and wellbeing, and the surrounding ecology.

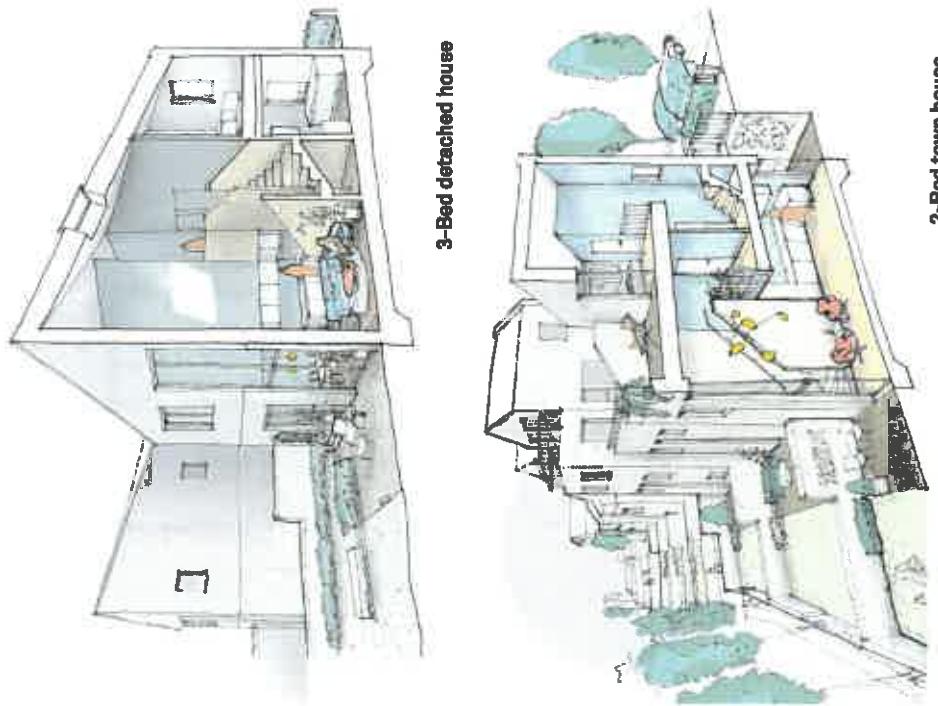
**Hoo House**  
Location: Suffolk, UK  
Size: 190sqm

This project is intended as a prototype for a low-cost, low-energy, new-build house which can sensitively respond to a market town setting. The project site had a planning restriction for a chalet bungalow and we responded to this by splitting the central ridge to provide more spacious rooms on the first floor.

We used a 'fabric first' approach to the building design, working with engineers, Euro Happold on the massing, orientation and glazing distribution to maximise passive solar gain in winter months. By arranging all of the cellular rooms into one half of the building we created a dramatic double height living area, with solar tubes bringing light deep into the heart of the building.



First Floor Plan



### Eshott Positive Living

Location: Yorkshire, UK

Size: 20,000sqm (150 homes)

The scheme will create a ground-breaking sustainable residential and commercial development in place of existing disused water treatment tanks on the site.

The housing has been led by a drive to create an exemplar residential development which will be one of the most sustainable in the UK. The masterplan outlines 150 homes, from 1-bedroom maisonettes to 5-bedroom detached houses to allow for a diverse community. All of the housing will be low energy construction, carefully orientated to maximise opportunities for passive solar gain in winter months as well as solar panels, all facing onto communal green landscaped areas.

When complete, this scheme will provide spaces for people to live, work and play, as well as a nationally recognised development for reaching high sustainability targets. It will repurpose the brownfield site to deliver a series of economic, social and environmental benefits through homes, open space and employment.





First Floor Plan

### Light House

**Location:** Dorset & Somerset, UK  
**Size:** 130sqm

We were commissioned by the Habitat First Group to design three and four bedroom new house types for the new Lower Mill Estate in Somerset. The design also features in their Silverlake, Dorset proposal. Both of these sites are a collection of elegant contemporary sustainable homes set in a bucolic setting.

Conceived as a building which is simple to understand, occupy and operate, the 'Light-House' is the first Habitat First Group design to meet Passivhaus standards and code level 6 of the old Code for Sustainable Homes. Based on a traditional housing typology, it is a compact but flexible and adaptable home. Large areas of south-facing triple-glazed windows provide natural day light deep into the house. High level automatic opening roof lights provide natural ventilation through a 'stack' effect, helping to purge the house when temperatures outside are high.

Overall, this design demonstrates that it is possible to live sustainably and beautifully without resorting to complicated methods or systems.



# TATE HAMMER

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Unit G1B2 Stamford Works  
3 Gillett Street  
London  
N16 8JH

T: 020 7241 7481  
E: [studio@tatehammer.com](mailto:studio@tatehammer.com)

## **APPENDIX 2 – SITES ALLOCATED IN DRAFT LOCAL PLAN WHICH HAVE FAILED TO DELIVER DESPITE ALLOCATION SINCE 1997**

<b>Site ref.</b>	<b>Site name and development description</b>	<b>Site size ha (% residential on mixed use sites)</b>	<b>Indicative capacity (homes)</b>	<b>Capacity evidence</b>	<b>Likely delivery timescale (S, M, L)</b>	<b>Our Comments</b>
IP009	Victoria Nurseries, Westerfield Road	0.39	12	30dph (DM23c) Low density to reflect suburban location	S	Allocated in 1997 Local Plan as part of site ref. 6.8, despite which has remained undeveloped. Displacement of existing nursery use would be required.
IP011c	Smart Street, Foundation Street (North) Allocated for residential development Site IP011b has been split to reflect the ownerships.	0.08	7	90dph (DM23a lower end of range)	M	Allocated in 1997 Local Plan as part of site ref. 5.8
IP012	Peter's Ice Cream	0.32	35	110dph (DM23a higher end of range)	M	Allocated in 1997 Local Plan as part of site ref. 5.11. Whilst parts of wider site have come forward, and signs of potential development have been apparent, it is noted that the site does not yet benefit from planning permission.
IP035	Key Street / Star Lane / Burtons (St Peter's Port)	0.54 (80%)	86	DM23a at a higher density of around 200 dph	M	Allocated in 1997 Local Plan as site ref. 5.6. Site lies between two busy roads as part of one way network, which may form constraint.
IP037	Island Site Allocated for housing and open space alongside existing Marina and small	6.02 (c. 70%)	421	100dph (DM23a midrange)	L	Allocated in 1997 Local Plan under site refs: 5.1 and 5.2.

	commercial uses to support enterprise zone.				The need for additional access arrangements is noted and may represent constraint.
IP054b	Land between Old Cattle Market and Star Lane	1.08 (60%)	23	40dph (DM23 b-c)	Allocated in 1997 Local Plan as part of site refs: 5.9 and 5.10
IP132	Former St Peters Warehouse Site, 4 Bridge Street	0.18	73	73 dwellings as part of a mixed use scheme (with B1a office use, leisure or small scale retail)	Allocated in 1997 Local Plan as part of site ref: 5.3. Lengthy vacancy with no signs of coming forward, despite allocation since 1997.
IP136	Silo, College Street	0.16 (c.80%)	48	Assume 6 flats per floor within 10 storey development with commercial on lower two floors (DM23a) and higher than average density consistent with other schemes along Quay).	Allocated in 1997 Local Plan as part of site ref: 5.3. Fire damaged buildings and lengthy vacancy with no signs of coming forward, despite allocation since 1997.
IP150d	Land south of Ravenswood – Sports Park (part adjacent to Alnessbourn Crescent only – to be master planned)	1.8	34	DM23 c. low density as part of mixed use with sports park	Allocated in 1997 Local Plan as part of site ref: 6.1. Remainder of Ravenswood community has been built out, but

				several parcels remain undeveloped.
1P150e	Land south of Ravenswood (excluding area fronting Nacton Road) – to be master planned	3.6	126	Allocated in 1997 Local Plan as part of site ref: 6.1 Remainder of Ravenswood community has been built out, but several parcels remain undeveloped.
			M	DM23 c. low density as part of mixed use with B1 employment uses
	<b>Total</b>		<b>865</b>	

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**J**



**From:** Jonathan .  
**Sent:** 11 February 2020 18:37  
**To:** PlanningPolicy  
**Subject:** Feedback on consultation, Site ref: IP150e  
**Attachments:** 5.\_updated\_21.01.20\_local\_plan\_final\_draft\_comments\_form\_ch.doc

We are generally supportive of a mixed tenure development on this site in line with the recent secretary of state's verdict that this be an appropriate ratio.

However, we cannot support development of any kind until IBC takes significant measures to improve the flow of traffic in the area.

Both short term solutions accounting for site traffic as well as long-term solutions for increased residency need to be put into effect.

The roundabouts at the entrance to Ravenswood are a significant bottle neck, causing dangerous congestion due to illegal manoeuvres by impatient drivers.

Traffic is regularly problematic at rush hour, but also at other hours due to the popularity of McDonald's.

Solutions might include additional entrances to the residential areas (with measures to prevent use as a cut through), additional entrances to Ravenswood retail park / McDonald's, additional lanes between roundabouts

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:

[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	<b>Local Plan Review, Site Sheets Part 2</b> <b>Site ref: IP150e (UC267) Land south of Ravenswood</b>
Please return this comments form to:	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or <b>Planning Policy Team</b> <b>Planning and Development</b> <b>Ipswich Borough Council</b> <b>Grafton House</b> <b>15-17 Russell Road</b> <b>Ipswich</b> <b>IP1 2DE</b>
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	<b>Part A – Personal details</b> <b>Part B – Your comment(s).</b>

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	N/A	
<b>First name</b>	N/A	
<b>Last name</b>	N/A	
<b>Job title (where relevant)</b>	N/A	
<b>Organisation (where relevant)</b>	N/A	
<b>Address (Please include post code)</b>	IP3 9GT	
<b>E-mail</b>		
<b>Telephone No.</b>		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation (and client if you are an agent):	Jonathan
---	----------

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Local Plan Review, Site Sheets Part 2  Site ref: IP150e (UC267) Land south of Ravenswood	We are generally supportive of a mixed tenure development on this site in line with the recent secretary of state's verdict that this be an appropriate ratio.  However, we cannot support development of any kind until IBC takes significant measures to improve the flow of traffic in the area.  Both short term solutions accounting for site traffic as well as long-term solutions for increased residency need to be put into effect.  The roundabouts at the entrance to Ravenswood are a significant bottleneck, causing dangerous congestion due to illegal manoeuvres by impatient drivers.  Traffic is regularly problematic at rush hour, but also at other hours due to the popularity of McDonald's.  Solutions might include additional entrances to the residential areas (with measures to prevent use as a cut through), additional entrances to Ravenswood retail park / McDonald's, additional lanes between roundabouts.

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

Yes

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

Yes

**Adoption of the Ipswich Local Plan Review.**

Yes

### PRIVACY NOTICE

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Felicia Blake**

(21)

**From:** James Little  
**Sent:** 11 February 2020 16:16  
**To:** PlanningPolicy  
**Subject:** SITE ALLOCATIONS AND POLICIES,(INCORPORATING,IP-ONE AREA ACTION PLAN),DEVELOPMENT PLAN DOCUMENT REVIEW –FINAL DRAFT  
**Attachments:** Consultation Comments Form.doc

Dear Sirs,

Please see attached Consultation Comments Form.

We have owned Airport Farm Kennels since 1997 and in discussion and correspondence with your Authority have always stated our formal objection to our land being considered for Park and Ride allocation. Whilst positive to see our land included in the latest Local Plan, our opinion has not changed.

Yours faithfully

James Little

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

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Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	SITE ALLOCATIONS AND POLICIES (INCORPORATING IP-ONE AREA ACTION PLAN) DEVELOPMENT PLAN DOCUMENT REVIEW – FINAL DRAFT
<b>Please return this comments form to:</b>	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

#### PART A PERSONAL DETAILS

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	Mr	
<b>First name</b>	James	
<b>Last name</b>	Little	
<b>Job title (where relevant)</b>		
<b>Organisation (where relevant)</b>	JPL Properties LLP	
<b>Address (Please include post code)</b>	Priory Park Ipswich Suffolk IP10 0JT	
<b>E-mail</b>		
<b>Telephone No.</b>		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	JPL Properties LLP
--	--------------------

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<b>Site Allocations and Policies Development Plan Document Review Final Draft. Site IP152</b>	<b>As owners of Airport Farm Kennels we continue to strongly object to our land being considered as a site for Park &amp; Ride.</b>

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

### PRIVACY NOTICE

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As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

K



# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Core Strategy and Policies Development Plan Document Review Final Draft</b> <b>Site Allocations and Policies Development Plan Document Review Final Draft</b> <b>Final Draft Local Plan Review Policies Map</b>
<b>Please return this comments form to:</b>	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  <b>Planning Policy Team</b> <b>Planning and Development</b> <b>Ipswich Borough Council</b> <b>Grafton House</b> <b>15-17 Russell Road</b> <b>Ipswich</b> <b>IP1 2DE</b>
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>		<b>Mrs</b>
<b>First name</b>		<b>Emma</b>
<b>Last name</b>		<b>Walker</b>
<b>Job title (where relevant)</b>		<b>Associate</b>
<b>Organisation (where relevant)</b>	<b>The Kesgrave Covenant Ltd</b>	<b>Phase 2 Planning and Development Ltd</b>
<b>Address (Please include post code)</b>	<b>Philip House St William Court Kesgrave Suffolk IP5 2QP</b>	<b>270 Avenue West Skyline 120 Great Notley Braintree Essex CM77 7AA</b>

E-mail		
Telephone No.		

## PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation ( <i>and client if you are an agent</i> ):	Emma Walker of Phase 2 Planning and Development Ltd on behalf of The Kesgrave Covenant Ltd
--	--

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Core Strategy and Policies DPD  Paragraph 6.17	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.
Core Strategy and Policies DPD  Paragraph 7.2	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.
Core Strategy and Policies DPD  Policy ISPA4	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this policy is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.
Core Strategy and Policies DPD  Paragraph 8.28	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
<b>Core Strategy and Policies DPD</b> <b>Paragraph 8.29</b>	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the ‘tests of soundness’. Further details on this matter are set out at the end of this form.
<b>Core Strategy and Policies DPD</b> <b>Policy CS2</b>	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this policy is not justified or effective and therefore fails the ‘tests of soundness’. Further details on this matter are set out at the end of this form.
<b>Core Strategy and Policies DPD</b> <b>Paragraph 8.55</b>	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the ‘tests of soundness’. Further details on this matter are set out at the end of this form.
<b>Core Strategy and Policies DPD</b> <b>Policy CS7</b>	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this policy is not justified or effective and therefore fails the ‘tests of soundness’. Further details on this matter are set out at the end of this form.
<b>Site Allocations and Policies DPD</b> <b>Policy SP1 (and consequential amendments to table 1 and paragraph 4.7)</b>	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, this site allocation should be included within the Site Allocations and Policies DPD. Further details on this matter are set out at the end of this form.
<b>Policies Map</b> <b>ISPA4</b>	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording relating to this site is not justified or effective and therefore fails the ‘tests of soundness’. Further details on this matter are set out at the end of this form.

Please ensure that Part B of your form is attached to Part A and return both parts to the Council’s Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

## **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

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**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

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The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Representations to the Local Plan Review – Final Draft  
Prepared by Phase 2 Planning and Development Ltd  
on behalf of The Kesgrave Covenant Ltd**

These detailed representations have been drafted in support of our representations in relation to the following policies, as summarised on the representation form:

**1. The Core Strategy and Policies Development Plan Document Review Final Draft:**

- **Paragraph 6.17**
- **Paragraph 7.2**
- **Policy ISPA4 – Cross Boundary Working to Deliver Sites**
- **Paragraph 8.28**
- **Paragraph 8.29**
- **Policy CS2 – The Location and Nature of Development**
- **Paragraph 8.55**
- **Policy CS7 – The Amount of New Housing Required**

**2. The Site Allocations and Policies Development Plan Document Review Final Draft:**

- **Policy SP2 (Omission of reference to land at Humber Doucy Lane)**

**3. Policies Map:**

- **ISPA4**

We would like to participate in the Local Plan Examination to enable the issues raised within these representations to be fully explored.

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Paragraph 6.17**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for "future" development for housing delivery and that it will be "appropriately phased" with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, its policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to "future" development or refer to the requirement for phasing without providing appropriate evidence and details.

#### **Proposed Amendment to the Plan**

Paragraph 6.17 should be amended to read:

"....A cross-border allocation for future development (within Ipswich Borough and Suffolk Coastal Local Plan area) for housing delivery, ~~appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure~~ is also identified in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road. ..."

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Paragraph 7.2**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the ‘tests of soundness’. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for “future” development for housing delivery and that it will be “appropriately phased” with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, its policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to “future” development or refer to the requirement for phasing without providing appropriate evidence and details.

#### **Proposed Amendment to the Plan**

Paragraph 7.2 should be amended to read:

“... (iv) The cross-border allocation for future development, ~~appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure~~ proposed at the northern end of Humber Doucy Lane through policy ISPA4; ...”

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Policy ISPA4: Cross Boundary Working to Deliver Sites**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that the development is viable and that there are no unnecessary delays to the delivery of development.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for "future" development for housing delivery and that it will be "appropriately phased" with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

The policy comments on the location of the green infrastructure. It should be noted that KCL has additional land in the vicinity of the allocation and therefore it may be possible to locate these uses outside the application site. We therefore seek flexibility to the wording of this policy to ensure that the most appropriate option can be pursued.

In addition, the policy sets out the requirements for affordable housing for the site. Whilst the provision of affordable housing on the site is supported in principle, the Council must ensure that targets set for sites are viable.

The draft Plan identifies that sites should provide at least 15% affordable housing, with the exception of land at Humber Doucy Lane and Ipswich Garden Suburb, which should provide at least 30% and 31% respectively. The assessment of affordable housing provision is set out in The Whole Plan Viability Study (January 2020). With regard to Humber Doucy Lane, the calculations (at Appendix 6 of the document) do not include Site Specific Section 106 Contributions or CIL, which leads us to query whether the full infrastructure costs of the development have been considered as part of the appraisal.

We are aware that the Whole Plan Viability Study has identified that Ipswich Garden Suburb development is viable with 31% affordable housing, yet the first two neighbourhoods have been subject to testing at the planning application stage, where it has been agreed that for viability reasons they can provide at least 4% and 5% respectively.

In light of the above, we would therefore suggest that further flexibility is applied to this policy to enable detailed viability assessment of the site.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, it's policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to "future" development or refer to the requirement for phasing without providing appropriate evidence and details. We recommend that the policy is amended to state that it will be subject to viability testing at the planning application stage, in accordance with policy CS12.

In addition, limiting the green infrastructure to the draft site allocation area is overly restrictive at this stage and does not enable the options to be fully explored. This approach is not the most effective and therefore does not comply with the tests of soundness.

#### **Proposed Amendment to the Plan**

Policy ISPA4 should be amended to read:

"Ipswich Borough Council will work with neighbouring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough but adjacent to the boundary, where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner. In order to meet housing needs within the Borough boundary as far as possible, the Council identifies a cross-border allocation for future development of 23.62ha of land within Ipswich Borough in 4 parcels forming ISPA4.1 for future housing growth and associated infrastructure improvements at the northern end of Humber Doucy Lane adjacent to Tuddenham Road. The allocation is shown on the accompanying site sheet for this policy. It will require land and infrastructure works and green infrastructure (including Suitable Accessible Natural Greenspace) on both sides of the Borough boundary in order to come forward, *however this could include land outside of the allocated site....*

*...Development will include at least 30% affordable housing, subject to viability testing at the planning application stage...."*

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Paragraph 8.28**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is not considered to be justified and therefore failing the ‘tests of soundness’. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development.

Paragraph 8.28 refers to transport mitigation measures required for the development of the site as being “challenging”. However, this is not considered to be the case. We re-iterate our earlier submissions in relation to the accessibility of the site and proposed transport measures below:

- The site benefits from good public transport accessibility. Humber Doucy Lane, which runs along the southern boundary of the site, is very well served by existing bus services from First Bus, Suffolk on Board and Ipswich Buses. Rail services at Westerfield Junction are easily accessible and around 2km from the site.
- The site also benefits from good road access and lies within approximately 1.5km of the A1214, which is part of the principal road network. The area is served by four existing radial routes, which give direct access to the A1214. There is good access to a number of distributor routes and no access issues.
- The site benefits from good accessibility to services and facilities with the nearest local centre located within walking distance (approximately 800 metres) with services including a convenience store, post office, hairdressers, bakers and public house and additional facilities proposed at the Ipswich Garden Suburb.
- Both Ipswich town centre and Heath Road Hospital are easily accessed by public transport from the site. The latter is a strategic health facility serving Ipswich and the surrounding area and is a major employer within the town.
- The development of this site promotes sustainable transport in accordance with paragraph 108 of the NPPF as:
  - It is located in a sustainable location, adjoining the existing built up area of Ipswich, with good access to facilities and services including good access by sustainable transports.
  - It is capable of providing safe and suitable access to the site for all users. The site can easily be accessed as the land parcels proposed for development have significant frontages onto Humber Doucy Lane.
  - As far as we are aware, SCC Highways have not expressed any objections to the proposal to allocate development in this area.

- A number of transport/highways mitigation measures will be considered as part of the proposals including upgrading of the junctions of Humber Doucy Lane /Tuddenham Road and Tuddenham Road/Church Road.
- The Local Plan Transport Modelling Report prepared by WSP concludes that Suffolk can accommodate the proposed housing growth with appropriate mitigation where necessary.
- The proposals will not influence the Ipswich northern bypass route. Even the inner-most option for the bypass indicates a route to the north of the railway line and therefore, the proposed development will have no impact on the proposed bypass or vice versa.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, it's the policies and supporting text relating to the proposed allocation at Humber Doucy Lane, the current reference to "challenging" transport mitigation measures are not justified.

#### **Proposed Amendment to the Plan**

Paragraph 8.28 should be amended to read:

"The site allocation at the northern end of Humber Doucy Lane is located at the edge of Ipswich approximately 3.5km from the town centre. Sustainable transport connections will be key to providing linkage to employment and other opportunities. In addition, it is acknowledged that the transport mitigation measures *are* required for the development of the site *are challenging* and it is essential that significant modal shift is delivered through strong travel plans and other sustainable measures."

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Paragraph 8.29**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking to query some of the detailed wording which unless clear and robust evidence can be provided is not considered to be justified or effective and therefore failing the ‘tests of soundness’. These representations therefore seek to retain the current allocation and whilst we support the affordable housing provision on site, we query whether the quantum of affordable housing has been robustly assessed.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development.

The draft Plan identifies that sites should provide at least 15% affordable housing, with the exception of land at Humber Doucy Lane and Ipswich Garden Suburb, which should provide at least 30% and 31% respectively. The assessment of affordable housing provision is set out in The Whole Plan Viability Study (January 2020). With regard to Humber Doucy Lane, the calculations (at Appendix 6 of the document) do not include Site Specific Section 106 Contributions or CIL, which leads us to query whether the full infrastructure costs of the development have been considered as part of the appraisal.

We are aware that whilst the Whole Plan Viability Study has identified that Ipswich Garden Suburb development is viable with 31% affordable housing, yet the first two neighbourhoods have been subject to testing at the planning application stage, where it has been agreed that they can provide at least 4% and 5% respectively.

In light of the above, we would therefore suggest that further flexibility is applied to this policy to enable detailed viability assessment of the site, if required.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, it’s the policies and supporting text relating to the proposed allocation at Humber Doucy Lane and the provision of affordable housing on the site, more detailed viability testing may be required to ensure that the site is viable having regard to all infrastructure costs.

#### **Proposed Amendment to the Plan**

Paragraph 8.29 should be amended to read:

“The Council will outline expected infrastructure provision of both green infrastructure and built infrastructure required as part of the joint agreed master-planning process to the cross-border Humber Doucy Lane sites. The Whole Plan Viability Assessment for the Local Plan identifies that this area of land falls within a high value zone and indicates that approximately 30% affordable housing could be achieved on a greenfield development, however this will be subject to further testing at the planning

*application stage. This level of affordable housing also broadly aligns with the Suffolk Coastal Local Plan affordable housing requirement of 33%.”*

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Policy CS2: The Location and Nature of Development**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

#### **Detail**

As Identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, referred to at policy CS2 and falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan Identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan Identifies that land at Humber Doucy Lane is allocated for "future" development for housing delivery and that it will be "appropriately phased" with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

The policy comments on the location of the green infrastructure. It should be noted that KCL has additional land in the vicinity of the allocation and therefore it may be possible to locate these uses outside the allocated site. We therefore seek flexibility to the wording of this policy to ensure that the most appropriate option can be pursued.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, it's the policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to "future" development or refer to the requirement for phasing without providing appropriate evidence and details.

In addition, limiting the green infrastructure to the application site is overly restrictive at this stage and does not enable the options to be fully explored. This approach is not the most effective and therefore does not comply with the tests of soundness.

#### **Proposed Amendment to the Plan**

##### **Policy CS2 should be amended to read:**

Representations to the Local Plan Review – Final Draft  
Phase 2 Planning and Development Ltd on behalf of The Kesgrave Covenant Ltd

**"b. Allocating sites for future development at the northern end of Humber Doucy Lane for housing and associated infrastructure, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure, and working with East Suffolk Council to master plan development and ensure a comprehensive approach to its planning and delivery (see policy ISPA4)..."**

## **The Core Strategy and Policies Development Plan Document Review Final Draft**

### **Paragraph 8.55**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of supporting text to ensure that there are no unnecessary delays to the delivery of development.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, referred to at policy CS2 and falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane will come forward "as development draws to a conclusion at Ipswich Garden Suburb". The Plan should be amended to provide greater clarity with regard to the infrastructure that is required for delivery of dwellings at Humber Doucy Lane. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, it's the policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to the site coming forward "as development draws to a conclusion at Ipswich Garden Suburb" without providing appropriate evidence and details.

#### **Proposed Amendment to the Plan**

The final bullet point of paragraph 8.55 should be amended to read:

~~"As development draws to a conclusion at Ipswich Garden Suburb it will enable lower density housing development to be master planned jointly with East Suffolk Council at the northern end of Humber Doucy Lane, which will maintain and ensure separation between Ipswich and surrounding settlements."~~

**The Core Strategy and Policies Development Plan Document Review Final Draft**  
**Policy CS7**

**Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the ‘tests of soundness’. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

**Detail**

As Identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for “future” development for housing delivery and that it will be “appropriately phased” with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

**Legal Compliance/Soundness**

Although we generally support the Plan, it’s the policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to “appropriate phasing with the delivery of the Ipswich Garden Suburb and its associated infrastructure” development or refer to the requirement for phasing without providing appropriate evidence and details.

**Proposed Amendment to the Plan**

Policy CS7 should be amended to read:

~~“... c. ...Delivery will also take place at the northern end of Humber Doucy Lane, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure ...”~~

## **The Site Allocations and Policies Development Plan Document Final Draft**

### **Policy SP2: Land allocated for Housing (Omission of reference to land at Humber Doucy Lane within Table 1)**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 of the Core Strategy at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, reference should also be made to this allocation in the Site Allocations and Policies document for consistency. As currently drafted the Site Allocations and Policies DPD, by failing to include reference to this allocation, is neither justified nor effective and therefore fails the 'tests of soundness'. This representation therefore seeks to include reference to this site within the DPD.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site and are keen to work with both Councils to progress this development.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036) and yet it is not referenced within the Site Allocations and Policies DPD. For consistency consequential amendments should be made to reference this site allocation Table 1 and within paragraph 4.7.

#### **Legal Compliance/Soundness**

Although we support the inclusion of the allocation at Humber Doucy Lane within the Core Strategy document, it should also be included within the Site Allocations and Policies DPD. Its omission is neither justified nor effective.

#### **Proposed Amendment to the Plan**

An additional line should be provided within table 1 in relation to the allocation at Humber Doucy Lane:

Site ref	Site name and development description	Site size ha (% residential on mixed sites)	Indicative capacity (homes)	Capacity evidence	Likely delivery timescale (S,M,L)
ISPA 4.1	Northern End of Humber Doucy Lane	23.62ha (c. 50%)	496	35dph (DM23c)	M/L

For the sake of completeness, this table should also include reference to Ipswich Garden Suburb.

Paragraph 4.7 should be amended to reflect the proposed changes to table 1 with revised wording as follows:

"The Indicative capacity of the sites in table 1a listed in the policy above is 6,5142,759 dwellings. These will contribute to meeting the minimum housing requirement of 8,010 dwellings by 2036, as identified through Policy CS7 of the Final Draft Core Strategy. In addition, the Final Draft Core Strategy allocates land for the development of approximately 3,500 dwellings at Ipswich Garden Suburb (the Ipswich

Northern Fringe) through policy CS10, with delivery expected to start in 2019 and end in 2036. The Core Strategy Review also identifies a cross-border allocation for future development (within Ipswich Borough and Suffolk Coastal Local Plan area) for housing delivery, appropriately phased with delivery of the Ipswich Garden Suburb and its associated infrastructure at the northern end of Humber Doucy Lane adjacent to Tuddenham Road, through policy ISPA4."

## **Policies Map**

### **ISPA4 Land allocated for future housing growth and associated infrastructure improvements**

#### **Summary**

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the ‘tests of soundness’. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text on the policies map to ensure that that there are no unnecessary delays to the delivery of development.

#### **Detail**

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the Policies Map identifies that land at Humber Doucy Lane is allocated for “future” housing growth and “associated infrastructure improvements”. As identified elsewhere within our representations, the Plan should be amended to provide greater clarity with regard to the infrastructure that is required and with this clarity, there is no requirement to refer to “future” development.

The proposals will need to “provide on- and off- site infrastructure to support the development and mitigate the impact of the development on the existing community and environment” in accordance with draft policy CS17 (Delivering Infrastructure). It is not necessary for the Policies Map to refer to associated infrastructure improvements, since this provision is made under draft policy CS17 and these improvements are likely to be off-site as well as on-site. One example of off-site requirements are highways improvements.

#### **Legal Compliance/Soundness**

Although we generally support the Plan, the Policies Map should not refer “future” development of the site, nor should it refer to infrastructure requirements. As currently drafted, it is neither justified nor effective and may cause unnecessary delay to delivery of development.

#### **Proposed Amendment to the Plan**

The Policies Map should be amended to read:

**“Land allocated for future housing growth & associated infrastructure improvements...ISPA4”**

## **Felicia Blake**

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**From:**   
**Sent:** 23 January 2020 17:09  
**To:** PlanningPolicy  
**Subject:** Fwd: Site ref IP307 - Prince of Wales Drive

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

>  
>  
> Mr Frank King  
>  
>  
>  
> 23 January 2020  
>  
> Dear Sir  
>  
> I was appalled to read of this proposed development. It is totally unnecessary, poorly presented and I cannot believe that a good and reasonable Borough Council should even contemplate such a hideous scheme.  
> Prince of Wales Drive is in an open area and consists of bungalows and semi detached properties in accordance with Lord Belstead's wishes to the Borough planners just before 1968.  
> There is a Primary School and Elderly People's home opposite to the proposed development. The school has some onsite car parking, but visitors (and staff) to both premises make full usage of the car park that is within the proposed development area. It is a valuable and well used car park, bordered by some comparatively recently built houses with the residents making full use of this facility down to lack of parking. School staff and visitors also fill the lay-by outside the school or park along Prince of Wales Drive.  
> Prince of Wales Drive is an exceedingly busy through road for the 15, 15a and 16 bus services which frequently struggle to get a straight run due to parking along this road. Plus we have more than normal vehicle traffic especially for the School. The School itself has lorry deliveries most days along with buses ferrying children around. These have to stand on the road creating more inconvenience because there is nowhere else for them to unload, red cones are permanently on the road outside the school to facilitate this.  
> The School is at full student capacity and this causes parking problems along the road with cars parked across driveways and this also includes staff from the school. The parking problems are not confined to two half hour segments, but continue throughout the day and well into evenings with after school activities.  
> Sensibly there is a 20 mph speed limit which is rarely adhered to, but more traffic would be lethal.  
> The elderly people's home and the primary school were built to enjoy the open views down to the river. The proposed development would destroy this.  
> I feel so sorry for the residents of Aberdare Close and Chatsworth Crescent plus of course many of us living along this road, who bought their property because they liked the open plan feeling and enjoy such wondrous views. Aberdare Close was built only a few years ago with full use of the current car park.  
> There is a need for shops in the area which has an ageing population. The Co-op own the proposed development site which had a very successful ladies hairdressing salon as well as an excellent kitchen furniture suppliers, plus a Co-op grocery store. This store was successful until the Borough Council gave planning permission to build an ASDA store much further along the estate. The Co-op could have sold or let the property, and indeed received offers, but decided not to do this in order to force a change of use of land for the site.  
> There will always be a need for affordable housing but there are more available and more suitable sites around. The open space at the side of ASDA or the unused allotments at Maidenhead plus a virtually unused sports field at Bourne Vale.

> The proposed development is overcrowded and will blight a current area in which to live and which conformed with Borough Council's ideals.

> It is obvious that the proposed development within such a busy and established community is wrong and should be withdrawn in the name of common sense and justifiable reason.

>

> Yours faithfully

> Frank King (Mr)

>

> Sent from my iPad

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

L



**From:** Chloe Parmenter  
**Sent:** 02 March 2020 16:31  
**To:** PlanningPolicy  
**Cc:** Phil Harvey  
**Subject:** Ipswich Borough Council Local Plan Review Final Draft - Representations  
**Attachments:** 200302 IBC Reps Forms.pdf; 200302 FINAL IBC Local Plan Review Representations.pdf

**Importance:** High  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir / Madam,

Please find attached our representations to the Ipswich Borough Council Local Plan Review Final Draft (Regulation 19) Consultation in relation to Land North of Burrell Road, Ipswich.

A representation form has been completed indicating each part of the Local Plan upon which we have made representations. Full comments are then provided in relation to the relevant sections, paragraphs, and policies, in the accompanying submission document.

I would be grateful if you could please confirm receipt of our representations by return.

Kind regards,

Chloe

Chloe Parmenter BSc  
Planner Colchester

L [linkedin.com/boyer](https://linkedin.com/boyer)  
[Wboverplanning.co.uk](http://Wboverplanning.co.uk)  
A 15 De Grey Square, De Grey Road, Colchester, Essex, CO4 5YQ

Boyer



Boyer is proud to support Trussell Trust

Boyer is proud to be supporting the Trussell Trust  
to end hunger and poverty in the UK.



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To see our Standard Terms and Conditions of Contract please [click here](#).  
At Boyer we take your data privacy seriously view our [privacy notice](#).

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	<b>Core Strategy and Policies Development Plan Document Review Final; Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft</b>
Please return this comments form to:	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
Title		Miss
First name		Chloe
Last name		Parmenter
Job title ( <i>where relevant</i> )		Planner
Organisation ( <i>where relevant</i> )		Boyer
Address (Please include post code)	c/o Agent	15 De Grey Square De Grey Road Colchester Essex CO4 5YQ
E-mail	c/o Agent	

Telephone No.		
---------------	--	--

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Miss. Chloe Parmenter, Boyer (agent)
--	--------------------------------------

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Core Strategy and Policies Development Plan Document Review Final;	See attached submission document
Site Allocations and Policies (Incorporating IP- One Area Action Plan) Development Plan Document Review Final Draft	See attached submission document

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.

Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.

Adoption of the Ipswich Local Plan Review.

**PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

# Land North of Burrell Road, Ipswich

Representations to the Ipswich Borough Council Local Plan Review  
(Reg 19 Final Draft)

Boyer

Report Control

Project: Land North of Burrell Road, Ipswich  
Client:  
Reference: 19.6058  
File Origin: Document  
Primary Author: CPv  
Checked By:

Issue	Date	Status	Checked By
1	26.02.2020	Draft	
2	02.03.2020	FINAL	

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## **APPENDIX**

**Appendix One – Site Location Plan**

**Appendix Two – Site Location Plan (115 Burrell Road Only)**

# 1. IPSWICH BOROUGH COUNCIL LOCAL PLAN REVIEW

## Overview

- 1.1 These representations have been prepared by Boyer on behalf of our client in response to the Ipswich Local Plan Review Final Draft (Regulation 19).
- 1.2 These representations make specific reference to land to the north of Burrell Road, Ipswich (see attached Site Location Plan at Appendix One).
- 1.3 The eastern portion of the site (115 Burrell Road) is currently subject to a pre-application enquiry (see Site Location Plan at Appendix Two), however the wider site now encompasses land immediately to the west of this parcel (103 Burrell Road).
- 1.4 The site is being promoted for residential development, and these representations refer to specific policies and the development potential of this site.
- 1.5 These representations respond to the relevant policies. Particular consideration has been given to the tests of soundness required to be met as set out by Paragraph 35 of the National Planning Policy Framework (NPPF, 2019), including whether the Local Plan is:
  - a) Positively prepared;
  - b) Justified;
  - c) Effective; and
  - d) Consistent with national policy.
- 1.6 Our comments reflect the chronological order of the sections and policies within the consultation document, and our representations are set out below.

## Core Strategy and Policies Development Plan Document Review Final Draft

### Part A: The Context

#### **Chapter 4: The Duty to Co-operate**

- 1.7 It would appear that the Council has sought to co-operate with the neighbouring authorities and statutory bodies on the key strategic and cross boundary issues. This is welcomed, and we consider that this is important given the tightly drawn administrative boundary, which constrains the practical options for meeting needs for development within the Borough.

#### **Chapter 5: Ipswich – The Place**

- 1.8 We agree that within Ipswich, there is an ongoing need for regeneration to address pockets of deprivation in some of the disadvantaged and physically more run down areas of the town.

- 1.9 We also support the focus on the Ipswich Waterfront as an area for regeneration creating space for a vibrant new cultural, residential, business and leisure area, complementing the existing marina facilities
- 1.10 Land to the north of Burrell Road lies along the River Orwell, and currently comprises a Sui Generis use. The proposed development would contribute to the regeneration of Burrell Road, and the wider IP-One Area, whilst also contributing to the attractiveness of the Waterfront, thereby meeting the Council's overarching focus of creating space for a vibrant new cultural, residential, business and leisure area, complementing the existing marina facilities.
- 1.11 It is welcomed that Ipswich Borough Council (IBC) are using regeneration opportunities to address deprivation, make places safer and create opportunities for all.
- 1.12 Land to the north of Burrell Road should therefore be considered as an appropriate location for residential development, which would accord with National and Local Policy in this regard.
- 1.13 It is noted from Table 2 that there is a need across Ipswich and East Suffolk to ensure the delivery of a sustainable supply of housing, with the Ipswich-specific issues being the limited availability of land, and large areas of protected land.
- 1.14 It is strongly recommended that the Council should be seeking to allocate additional residential sites to meet this unmet housing need within the Borough. Land north of Burrell Road is a suitable, available and deliverable site and should be allocated for residential development.

#### **Part B: The Strategy**

##### **Chapter 6: Vision and Objectives**

- 1.15 We support the objective for housing set out in Paragraph 6.8 (2.), which states "*at least (a) 8,010 new dwellings shall be provided to meet the needs of Ipswich within the Housing Market Area between 2018 and 2036 in a manner that addresses identified local housing needs and provides a decent home for everyone.*"
- 1.16 We also agree with Point 4. that development will be directed to the central Ipswich IP-One area.
- 1.17 It is noted that the spatial approach to delivering sustainable growth in Ipswich seeks to, inter-alia:

- Make the most effective use of previously developed land;
  - Place new residents in close proximity to jobs, services, facilities and public transport nodes;
  - Regenerates some of the more deprived areas surrounding the historic core and addresses social needs by tackling issues of social and economic deprivation.
- 1.18 We also recognise that, in terms of a sequential test to development as required by the NPPF, as well as the need for urban regeneration in central Ipswich, there is no realistic alternative to locating some development in Flood Zone 3.
- 1.19 Land north of Burrell Road is located in proximity to the Waterfront and its facilities and services. Its proposed regeneration would contribute to the regeneration of Burrell Road, and the wider IP-One Area, whilst also contributing to the attractiveness of the Waterfront.

#### **Chapter 7: The Key Diagram**

- 1.20 The location of the IP-One area in Diagram 3 is supported, however it is considered that the extent of the Waterfront and the proposed location for major housing development could be extended westwards, especially in light of proposed allocations IP031a and IP031b for residential development.
- 1.21 In doing so, this would incorporate the site to the north of Burrell Road, which is a suitable, available and deliverable site which is capable of accommodating residential development to meet the unmet need within the Borough. The site should therefore be allocated for residential development.

#### **Chapter 8: The Spatial Strategy**

- 1.22 It is welcomed that the housing need for Babergh, Mid Suffolk and the wider Ipswich Housing Market Area is based on the NPPF standard methodology.
- 1.23 We do however note that there does appear to be some discrepancy in the housing need figures agreed across the Housing Market Area (HMA), as set out in the table below. It is understood the Ipswich Strategic Planning Area (IPSA) agreed a Statement of Common Ground 2020, and a copy of this is available on the IBC website signed January 2020.

*Table 1: Ipswich Housing Market Area*

	East Suffolk Council Local Plan Final Draft	Statement of Common Ground December 2018	Statement of Common Ground March 2020 IBC Local Plan Review
Babergh	7,560	7,560	7,560
Mid Suffolk	10,620	10,530	10,008
Ipswich	8,822	8,010	8,010

Suffolk Coastal	10,476	9,270	9,756
HMA	32,278	35,370	35,334

- 1.24 It appears that the East Suffolk Final Draft Local Plan relies on the standard methodology based on the 2016 household projections, whereas the IBC Local Plan Review focusses on the 2014 household projections, thus reducing their housing need figure.
- 1.25 Without further clarification with regards to the discrepancies between these projections, it is unclear whether the Council's emerging Local Plan meets the tests of soundness, as outlined in Paragraph 35 of the NPPF.

#### **Policy CS2: The Location and Nature of Development**

- 1.26 We support that Policy CS2 seeks to achieve regeneration and sustainable growth through, inter-alia:
  - Focusing new residential development and community facilities into the town centre, the Waterfront, Portman Quarter (formerly Ipswich Village), and Ipswich Garden Suburb and into or within walking distance of the town's district centres, and supporting community development; and
  - Directing other employment uses (B1 (except office), B2 and B8) to employment areas distributed in the outer parts of the Borough, with a 'town centre first' approach to the location of offices.
- 1.27 We also agree that the town centre, Portman Quarter and Waterfront will receive the highest densities of development, including high-density housing developments, with medium-density and locally focused facilities to be provided elsewhere in IP-One and within and around district centres, with lower density development elsewhere. It is recognised that this approach will: maximise opportunities to re-use previously developed land within central Ipswich; ensure that new housing is provided close to local shops, facilities and transport nodes; and support the ongoing regeneration of central Ipswich and particularly of the Waterfront and town centre.
- 1.28 Land north of Burrell Road offers an opportunity to meet Policy CS2 by accommodating residential development which would contribute towards meeting the needs for development within the Borough in a sustainable location, which is in close proximity to local services and facilities and transport nodes, including the train station.

#### **Policy CS3: IP-One Area Action Plan**

- 1.29 We support the production of the IP-One Area Action Plan incorporated in the Site Allocations and Policies Development Plan Document, to plan for significant change in central Ipswich and help to deliver the Ipswich Vision.

- 1.30 It is recognised that the purpose of the Action Plan is to allocate sites for development in IP-One and define the extent of the Waterfront and the Portman Quarter. However, we are concerned that the Action Plan does not make the most of allocating previously developed land for residential development. It is therefore considered that, at this stage, the emerging Local Plan does not meet the tests of soundness in terms of ensuring the consistent delivery of housing in accordance with Paragraph 35 of the NPPF.
- 1.31 It is considered that a greater number of short to medium scale sites should be allocated to ensure the consistent delivery of housing within the Borough. Land to the north of Burrell Road offers an opportunity to accommodate a degree of residential development in the short to medium term. The site is deliverable over the Plan period, and would provide an opportunity to enable the delivery of sustainable development in accordance with National Planning Policy. This is set out in further detail in section 2 of this document.

#### **Policy CS7: The Amount of Housing Required**

- 1.32 The Council state a housing requirement figure of at least 8,010 dwellings for the period 2018 – 2036. It is noted that Policy CS7 states that IBC will keep the housing figure under review and consider any implications for meeting Ipswich's Housing Need within the Ipswich Housing Market Area.
- 1.33 It is also noted that IBC have prepared a Draft Housing Delivery Action Plan as a result of the housing Delivery Test Figures (published in February 2020) identify that IBC only delivered 66% of their identified need over the period of 2015-2018. This resulted in the requirement for an Action Plan together with a 20% buffer of additional land to deliver housing.
- 1.34 The most recent Housing Delivery Test identifies that IBC were only able to deliver 46% of the identified need for homes for the period of 2016-2019, thus asserting the requirement for a 20% buffer of additional land to deliver housing. Therefore, the situation remains unchanged.
- 1.35 It is concerning that whilst paragraph 8.108 of the draft Core Strategy acknowledges that policies should include identification of a supply of specific, deliverable sites for years 1-5 from adoption with an appropriate buffer, and specific, developable sites or broad locations for growth for years 6-10, but does not make reference to the requirement for a 20% buffer as a result of the Housing Delivery Test.
- 1.36 Whilst it is noted that the Housing Delivery Test figures are fluid, in light of the Council's historic poor housing delivery, a greater number of short and medium-scale developments should be allocated to ensure the consistent delivery of housing in accordance with the National Planning Policy Framework.
- 1.37 Land at Burrell Road offers an opportunity to deliver a sustainable development that would regenerate this part of Ipswich, contributing to the regeneration of Burrell Road and the wider IP-One Area, whilst also contributing to the attractiveness of the Waterfront, which is at the forefront of local policy.

- 1.38 The Draft Housing Delivery Action Plan sets out various actions, and we agree that IBC should enhance the potential role of small and medium sized house builders. It is noted that the Action Plan also states that the Council will seek to support the creation of developer consortiums where an appetite exists. Our client would be willing to explore this opportunity, and this is exemplified through the current purchase of the neighbouring site.
- 1.39 Policy CS7 states that the Council will allocate land to provide for at least 6,100 dwellings (net) in the Borough, and expect that 700 dwellings will be delivered on small windfall sites between 2022 and 2036 at a rate of 50 dwellings per annum. However, it is of concern that the Authority Monitoring Report (June 2019) identifies that 47 dwellings were delivered through windfall sites in the 2017-18 monitoring period.
- 1.40 Development of the site to the north of Burrell Road would contribute to the delivery of windfall sites across the Borough.
- 1.41 We support the commitment for 100% of dwellings to be delivered on previously developed land in the IP-One area.

#### **Policy DM25: Protection of Employment Land**

- 1.42 We support that outside of defined Employment Areas, the conversion, change of use or redevelopment of sites and premises in employment use to non-employment uses will be permitted where:
  - c. There is no reasonable prospect of the site being re-used for employment purposes over the plan period; or
  - d. the proposed use is residential and it can be acceptably accommodated, would make more effective use of the site and would not harm the economic development strategy of the plan; and
  - e. in relation to c. and d., the proposed use is compatible with the surrounding uses and is an appropriate use for the site.
- 1.43 Land at Burrell Road is located outside of defined Employment Areas, and it is considered that the redevelopment of the site to residential use would be a more effective use of land in accordance with Paragraph 117 of the NPPF. Allocation of the site for residential development would improve the soundness of the plan by ensuring the consistent delivery of housing, in accordance with the National Planning Policy Framework.
- 1.44 The proposed development is also compatible with the surrounding uses which comprise predominantly residential uses. The site should therefore be included as an allocation for residential development.

**Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan  
Document Review – Final Draft**

**Part A: The Context**

**Chapter 2: The Ipswich Local Plan**

- 1.45 We support the location of the IP-One Boundary as illustrated in Figure 1.
- 1.46 We also agree with the identification of strategic issues to be addressed, including allocating sufficient land to meet objectively assessed housing need in accordance with the National Planning Policy Framework.

**Part B: The Policies**

**Policy SP2 Land Allocated for Housing**

- 1.47 We support the allocation of sites for residential development. However, it is our view that our client's site should be considered for residential development in the IP-One Area. The site is adjacent to proposed allocation IP031a, and would make a logical extension to this. It is therefore considered that, at this stage, the emerging Local Plan does not meet the tests of soundness in terms of ensuring the consistent delivery of housing in accordance with National Planning Policy.

**Policy SP11 The Waterfront**

- 1.48 It is noted that the Waterfront will contain a mix of uses including residential, community, office, arts, culture, open space, boat-related and tourism.
- 1.49 It is however considered that the Waterfront area should be extended westwards to encompass the site to the north of Burrell Road, which provides an opportunity for regeneration of the site to a residential use, which is compatible with this Policy. This would comply with Paragraph 5.22 which states that Policy CS2 focuses on residential and community facility development within the Waterfront in order to support the regeneration and sustainable growth of Ipswich, and mixed use development within the town centre.
- 1.50 In doing so, this would incorporate the site to the north of Burrell Road, which is a suitable, available and deliverable site which is capable of accommodating residential development to meet the unmet need within the Borough. The site should therefore be allocated for residential development.

## 2. LAND TO THE NORTH OF BURRELL ROAD, IPSWICH

### Introduction

- 2.1 Our client is actively seeking to promote the site to the north of Burrell Road, Ipswich, for residential development.
- 2.2 The land being promoted is approximately 0.3ha and comprises of a storage/distribution and sales base for Silverton Aggregates Ltd, who are seeking to relocate to a larger location within the Borough; and Eastern Counties Pumps Ltd who are also looking to relocate.
- 2.3 The site abuts the River Orwell along its northern edge, and is separated from the river by a flood barrier. To the east of the site lies a car park (proposed allocation IP031a), and residential development beyond this. Residential properties also extend to the west towards the train station, which is located 0.2 miles away from the site. Existing linear residential development is also situated on the opposite side of Burrell Road.
- 2.4 The site is located within the IP-One Area of Ipswich, where residential development is supported.
- 2.5 The site is also well located in terms of strategic road networks, including the A14 (approximately 2.7 miles away) and the A12 (approximately 3.2 miles away). These road networks connect the site to Cambridge and Bury St Edmunds, and Colchester respectively.
- 2.6 The site lies entirely within Flood Zone 3, but benefits from defences which protect the site from fluvial flooding from the River Orwell, as well as additional flood defences in the wider locality. The site also benefits from the recently opened tidal flood defence barrier.
- 2.7 The nearest heritage assets are located to the south, and include Church of St Mary at Stoke (Grade I Listed); part of the warehouses at the former Stoke Hall (Grade II Listed); and Lonsdale Cottage (Grade II Listed). These heritage assets are separated from the site by Burrell Road. Grade II Listed Glipping House is located to the east on the opposite side of Bridge Street, and further listed buildings lie to the north of the River Orwell.
- 2.8 The surrounding area accommodates a range of uses, including employment, residential and car parking. However, the site as existing is the only industrial/commercial site along Burrell Road, and the development of the site would contribute to the regeneration of the area, contributing to sustainable development and ensuring consistent delivery of housing, in accordance with the National Planning Policy Framework.
- 2.9 Silverton Aggregates are seeking to relocate to a larger premises within the Borough to allow for the required expansion and growth of the business, together with better suitability in relation to HGV and trades vehicle access. The proposed development of the site would therefore make a more effective use of land, in accordance with Paragraph 117 of the NPPF and Policy DM25.
- 2.10 Eastern Counties Pumps Ltd are also looking to vacate the site.

### **Proposed Development**

- 2.11 The inclusion of the site to the north of Burrell Road in the Local Plan Review would have a number of positive benefits, including the provision of much needed housing in the Borough in accordance with the NPPF.
- 2.12 In addition, it is considered that the development of the site would contribute to the regeneration of Burrell Road, and the wider IP-One Area, whilst also contributing to the attractiveness of the Waterfront, thereby meeting the Council's overarching focus of creating space for a vibrant new cultural, residential, business and leisure area, complementing the existing marina facilities.
- 2.13 The site is considered to be capable of accommodating residential development in the short to medium term. The current pre-application enquiry concerns only the Silverton Aggregates site, which is considered capable of accommodating 34 No. two bedroom apartments.
- 2.14 The proposed development complies with Policy DM25 which permits the change of use or redevelopment of employment sites outside of defined Employment Areas where: residential development can be acceptably accommodated; would make more effective use of the site; would not harm the economic development strategy of the plan; and is compatible with the surrounding uses and is an appropriate use for the site.

### ***Relocation of the Existing Business***

- 2.15 Silverton Aggregates Ltd are currently seeking relocation to a larger and more suitable premises which can accommodate the expansion of the business. This expansion is anticipated to take place within the Borough of Ipswich, creating additional employment opportunities for the local population. Eastern Counties Pumps Ltd are also looking to vacate the site.
- 2.16 The site as existing currently constrains the expansion of the business as it places physical and operational restrictions on its proposed future growth. For example, the access arrangements are not suitable for the increase in volume and size of vehicles related to the business.
- 2.17 Moreover, the existing buildings are of poor construction and energy efficiency, and are therefore not particularly suited to the needs of modern business.
- 2.18 The proposed development therefore complies with Policy DM25 which permits the change of use or redevelopment of employment sites outside of defined Employment Areas where: residential development can be acceptably accommodated; would make more effective use of the site; would not harm the economic development strategy of the plan; and is compatible with the surrounding uses and is an appropriate use for the site. The allocation of the site to the north of Burrell Road would ensure consistent delivery of sustainable development in accordance with National Planning Policy.

*Land Ownership and Deliverability*

- 2.19 The western portion of the site (115 Burrell Road) is under single ownership. Our client is also in the final stages of purchasing the western section (103 Burrell Road).
- 2.20 It is considered that this significantly de-risks the deliverability of the site as there will be no third parties involved in the site promotion and its delay to come forward as a future planning application.
- 2.21 It is considered that this should be given considerable weight when assessing this site for allocation within the Local Plan as the site is deliverable over the plan period.
- 2.22 Land north of Burrell Road is a suitable, available and deliverable site and should be allocated for residential development.

*Highways and Access*

- 2.23 Access to the site is gained off Burrell Road.
- 2.24 Suitable accesses to the site, and any required highway improvements, would be agreed with officers from Suffolk County Council Highways, and this should be possible

*Flooding and Drainage*

- 2.25 The site lies entirely within Flood Zone 3, but benefits from defences which protect the site from fluvial flooding from the River Orwell, as well as additional flood defences in the wider locality. The site also benefits from the recently opened tidal flood defence barrier.
- 2.26 A full Flood Risk Assessment would be submitted as part of any future application on the site, and any development would look to mitigate against the implications of its location within Flood Zone 3, which would be informed by engagement with the Council and the Lead Local Flood Authority (LLFA).

**Proposed Mechanism for Delivery**

*Site Promotion*

- 2.27 We would welcome your consideration of the potential to bring this site forward for residential development as part of the Local Plan.
- 2.28 Alternatively, it is our view that the site represents an opportunity for windfall development, which would contribute to much needed housing stock in the Borough.

*Engagement*

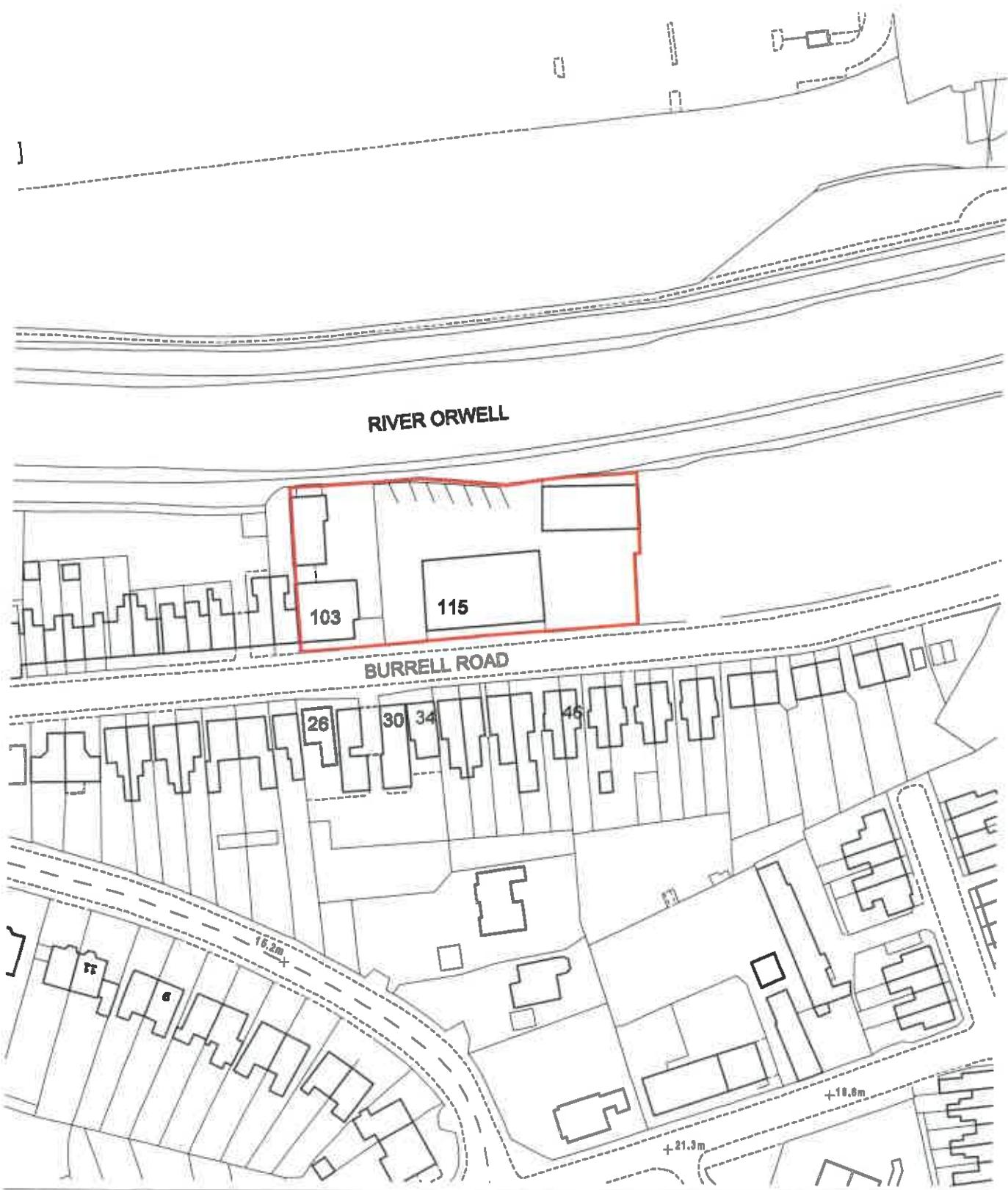
- 2.29 The client has already commenced the engagement process through the pre-application enquiry currently submitted which relates to the reduced area of the site.
- 2.30 Our client will also seek to engage with key stakeholders, and the local community to obtain their feedback and inform the proposals for the site.

## Summary

- 2.31 In the consideration of the inclusion of the site in the Local Plan, suitable weight should be afforded to the contribution that the delivery of development would make to the housing land supply across the Borough. This would
- 2.32 The development proposal would contribute to the supply of homes across the Borough, and represents a sustainable use in this area, which would not be out of character when considering the existing surrounding uses. The site represents a logical extension to the proposed residential allocations IP031a and IP031b.
- 2.33 The site is in a highly sustainable location in relation to its proximity to the train station and local services and facilities.
- 2.34 The development would assist in the regeneration of the area, providing a positive impact and uplift to the locality.
- 2.35 The site is also entirely previously developed land, and thus its development would comply with local and national policy in sustainability terms.
- 2.36 Allocation of land to the north of Burrell Road for residential development would make more effective use of the brownfield site, in accordance with Paragraph 117 of the NPPF.
- 2.37 Residential development of the site also accords with Policy DM25 which permits the change of use or redevelopment of sites from employment to residential use provided that the proposed development would make more effective use of the site and is compatible with the surrounding uses.
- 2.38 It is considered that a greater number of short to medium scale sites should be allocated to ensure the consistent delivery of housing within the Borough. Land to the north of Burrell Road offers an opportunity to provide a degree of residential development in the short to medium term. The site is deliverable over the Plan period, and would provide an opportunity to enable the delivery of sustainable development in accordance with National Planning Policy. This is set out in further detail in section 2 of this document.
- 2.39 Land to the north of Burrell Road is a suitable, available and deliverable site and should be allocated for residential development.



## **APPENDIX ONE – SITE LOCATION PLAN**



Project: Residential development

Address: 103 and 115 Burrell Rd, Ipswich IP2 8AE

Drawing: Site identification plan

Client: FGH Ltd

Drawn / checked: AJ / MB

Drawing no / Rev: 0681\_A\_CD\_05

Date: 26 / 02 / 2020

Scale: 1:1250 @ A4 paper

Status: PLANNING

GROW Design studio

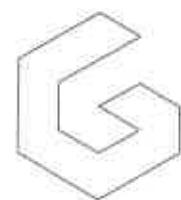
Unit 14 Park Farm

Kelvedon Rd, Inworth

Colchester CO5 9SH

+44 (0)1376 572588

[www.studiogrow.co.uk](http://www.studiogrow.co.uk)



## **APPENDIX TWO – SITE LOCATION PLAN (115 BURRELL ROAD ONLY)**





Project: Residential development  
Address: 115 Burnell Rd, Ipswich IP2 0AE  
Drawing: Location plan  
Client: FGH Ltd  
Drawn / checked: AJ  
Drawing no / Rev: 0054\_A\_CD\_01

Date: 20/02/2018  
Scale: 1:1250 @ A3 paper  
Status: CONCEPT

Rev	Description	Date
-	-	-

GROW Design Studio  
No 1, The Machine  
London Road  
Rowthill End  
Wivenhoe, Essex CM9 1HA  
01206 672586  
www.growdesignstudio.co.uk  
studio@growdesignstudio.co.uk





# Boyer

15 De Grey Square, De Grey Road, Colchester, CO4 5YQ | 01206 769 018  
[colchester@boyerplanning.co.uk](mailto:colchester@boyerplanning.co.uk) | [boyerplanning.co.uk](http://boyerplanning.co.uk)

**From:** Cindy Lawes ·  
**Sent:** 14 February 2020 15:25  
**To:** PlanningPolicy  
**Subject:** 126 Houses off Alnesbourn Crescent, Ravenswood

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sirs

### **OBJECTIONS TO THE PROPOSED DEVELOPMENT**

I want to lodge my objections to this proposed development on the following grounds:

#### **Traffic Management**

It is beyond understanding that a suburb this size only has one entrance and exit. The building of another 126 houses will obviously bring additional vehicles into the suburb, and this in turn will undoubtedly exacerbate problems with the already overloaded ingress and egress point to the suburb. We residents have no other option but to manage through the Henning Road roundabout, which is frequently blocked by people trying to get into the MacDonalds (a problem that no-one appears to want to address) and then out the suburb onto a major roundabout. I do not feel it even necessary to begin to mention the problems we residents face when the Orwell Bridge is closed.

Traffic around the MacDonalds will also no doubt increase, causing additional problems.

At a recent Residents' AGM it was mentioned that there was a proposal to create another access road off the A1189. I fail to see how this will alleviate any of the problems as it will simply slow down the movement of vehicles away from the main roundabout will the exit from Ravenswood will become even more congested.

#### **Amenities**

The local doctor's practice, Ravenswood Medical Centre, is already stretched and this situation has been made worse by closure of the Landseer Surgery. Who is going to provide medical services for the new people moving into the suburb ?

CINDY LAWES

A1189

Feb  
26.20

## PROPOSED LOCAL PLAN SITE ALLOCATION

Site ref: IP354-72

Site area: 34ha

Cullingham Road – Ipswich.

26<sup>th</sup> February 2020.

Dear Sir,

I appreciate that some sort of development will probably take place on this site but as one who has lived in the road for the last 15 years I have worries about the scale of this planning proposal.

### INTRODUCTION

\*Cullingham Road is a quiet cul de sac where a large number of the residents have lived for many years, some their whole life. Although not a classy road by any means the people who live here make their little homes their castles and there is a general community feel. People are friendly and talk to each other and work together to keep the road clean and tidy, making it one of the cleanest side roads in this area and maybe Ipswich. We "love our street". Any rubbish generated generally comes from passers by who sit at the end of the road with their fish n chips etc. leaving our residents to clear up after them – which we do regularly. A bigger population may well dilute this quiet and friendly area.

### FLOODING

\*In 1953 and earlier the road flooded quite badly due to the nearby rivers, and there are still people living in the road today who remember this. With recent obvious climate change and increase of flooding all over the UK, despite having improved flood defences the Environment Agency tell us there is every chance we may flood again in the future. Is this the best place to add large numbers of new housing?

## PILING

\*Building close to the river is almost certainly going to necessitate some sort of piling which can cause serious vibrations. Will the current residents be compensated for any cracking or other damage done to their homes as a result of this? The current houses are right next to the planned development area.

## WILDLIFE CONSERVATION

\*My neighbours tell me that there is a large population of Great Crested Newts living on the river bank and land in that area of Cullingham Road. Due to enormous declines in range and abundance in the last century, the great crested newt is strictly protected by British and European law which makes it an offence to: kill, injure, capture or disturb them; damage or destroy their habitat; and to possess, sell or trade.

## ROAD QUALITY/ MAINTENANCE and TRAFFIC

\*We do our bit to look after our road, but it is not seen as a high priority road for maintenance etc. by councils, and as such suffers from pot holes and poor road surfacing, beyond the control of the residents. I also understand that the sewer pipes in the road are not huge and probably not suitable for an enlarged population. This would all need to change if the road is to have more people living in it and driving along it. At the very least we need to have the "Please Keep Clear" reinstated on the Handford Road junction which is already a problem for cars to get in and out of, often making traffic queues on Handford Road as cars wait for a chance to turn into Cullingham Road. There will also be increased traffic and large vehicles passing along Cullingham Road when the building works are in progress. This is likely to destroy our already crumbling road even more.

## PARKING

\*Currently cars are generally parked on both sides of the road the full length of the road. If new housing were to be built would there be sufficient parking for them? It would be idle to pretend that none of the new residents will have a car. Some may have two cars and quite likely a works van too.

## CHILDRENS' PLAY AREA

\*There is nowhere for children to play in Cullingham Road apart from in the road itself. Parents understandably are not keen letting their children play in the road. Will the gardens be sufficiently large or will a proper secure play area be created?

There is also another planning proposal on the opposite side of the road for another 6 dwellings on top of the 24 by the river. All the above applies to both of the developments.

## CONCLUSION

The residents all accept that some sort of development, residential or otherwise, will probably take place on this plot. Our main concerns are the size of development and will this be a Housing Association or similar development? Currently a large proportion of the houses in Cullingham Road are owner occupied. To dilute this would probably not be ideal for the future of the road.

Tim Leggett.

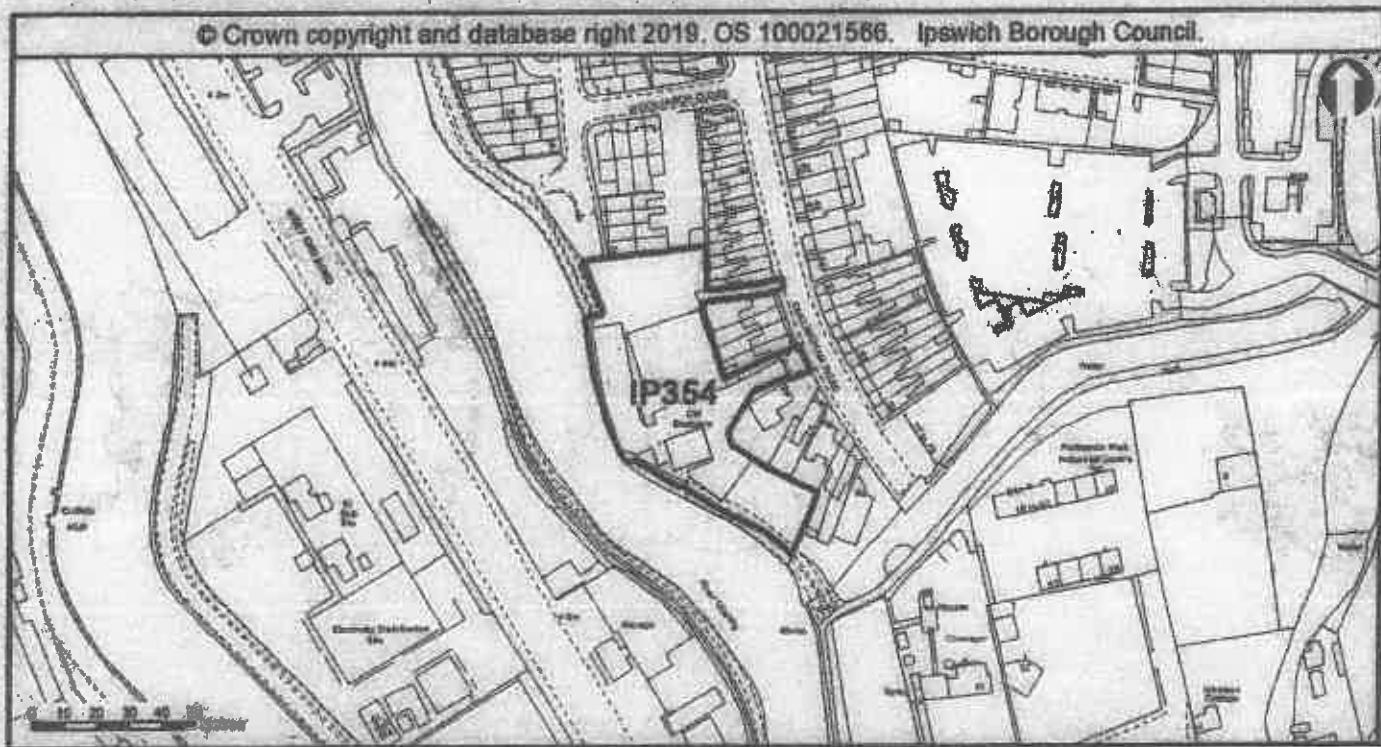
# IPSWICH BOROUGH COUNCIL

# PUBLIC NOTICE

**PLEASE NOTE THIS IS A PROPOSED LOCAL PLAN SITE ALLOCATION NOTICE AND NOT A NOTICE OF A PLANNING APPLICATION**

Site ref: IP354 – 72 (Old Backyard) Collyham Road  
Site area: 0.34ha  
Proposed use: Residential (34 dwellings)

Proposed Local Plan Site Allocation - Allocation Policy 2020.



Members of the public can inspect the Part 2 : Final Draft Site Allocation and Policy  
Document from December 2019 via the Council's website at [www.ipswich.gov.uk](http://www.ipswich.gov.uk) and click on 'Current Consultations', or at the Central Library, Customer Services Centre or Gresham House (by appointment) during the public consultation period, which runs between Wednesday 16<sup>th</sup> January and Monday 2<sup>nd</sup> March 2020. All comments on the proposed allocations must be made in writing, and be received either electronically via the Ipswich Borough Council website, or by email / letter to the address below by 11.00pm on Monday 2<sup>nd</sup> March 2020.

**DATE OF PUBLIC NOTICE 16<sup>th</sup> January 2020**



**IPSWICH**  
BOROUGH COUNCIL

Planning and Development  
Ipswich Borough Council  
Gresham House, 15-17 Russell Street  
Ipswich IP1 2UE  
01473 230200  
[email:planning@ipswich.gov.uk](mailto:email:planning@ipswich.gov.uk)  
[www.ipswich.gov.uk/planning](http://www.ipswich.gov.uk/planning)

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 26<sup>th</sup> February 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England)  
Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

 → [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website: [www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	<p><b>Ipswich Local Plan Review Final Draft Consultation</b></p> <p><b>Table 8B</b></p> <p>figure 1 – headed access <b>Access &amp; Transport</b></p> <p><b><u>Improvements to fonnereau way (north section to Lower Rd)</u></b></p>
Please return this comments form to:	<p><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</p> <p>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</p>
Return by:	<b>11.45pm Wednesday 26<sup>th</sup> February 2020</b>
This form has two parts:	<p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>

### PART A PERSONAL DETAILS

Title	1. Personal details	2. Agent's details (if applicable)
First name	Mr & Mrs	
Last name	Fred	
Job title (where relevant)	Financial Manager	
Organisation (where relevant)	The Docks	
Address (Please include		

## PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation  
(and client if you are an agent):

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<b>Access &amp; Transport northern end of the so called fonnereau way</b>	<p><b>Northern end section of the so called fonnereau way walk.</b></p> <p>Having just been held up for over 20 minutes on our walk at the northern end section of the so called fonnereau way while a sewage lorry empties slurry at broad acres farm, we find this route is highly unsuitable and unacceptable for pedestrians for safety reasons. This is an accident blackspot waiting to happen.</p> <p>The slurry lorry took up the entire width of the access and we had to stand in the rain and wait until it was complete. This section of the walk does not comply with the design and access statement where all 'uses' in an area must be compatible with each other, these potential conflicts with be must be identified and resolved within the design.</p> <p>How can pedestrians walk a route where slurry lorries are taking up the complete width of the access? Furthermore, this lorry had to reverse and my concerns raise the serious issue that if someone was partially sighted or a child was walking alone, heavens knows what might happen. This section of the walk is unsafe for pedestrians. We spoke to another person who we saw walking along the adjoining Lower Road in Westerfield and they told us, they find the route highly unsafe as the access is the main driveway to the water-board pumping station and a house, where cars and lorries use it on a daily basis.</p> <p>Ipswich Borough Council you need to get your act together as your design in figure 1 – headed access and movement does not take into account moving lorries and vehicles, therefore we won't be walking this route again, its unsafe!</p> <p>We saw that on figure 2 the orange line marked indicating the new position for this so called fonnereau way will avoid potential danger by accessing a safer route directly into the park avoiding lorries and vehicles.</p> <p>We say as a family Ipswich Borough Council you have a duty to make access safe for all pedestrians, so come on and make us a safe route!!!!</p> <p>We have attached the relevant plans for your immediate attention</p> <p>Mr and Mrs Lewis and Family</p> <p>Ipswich resident.</p>

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Wednesday 26<sup>th</sup> February 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

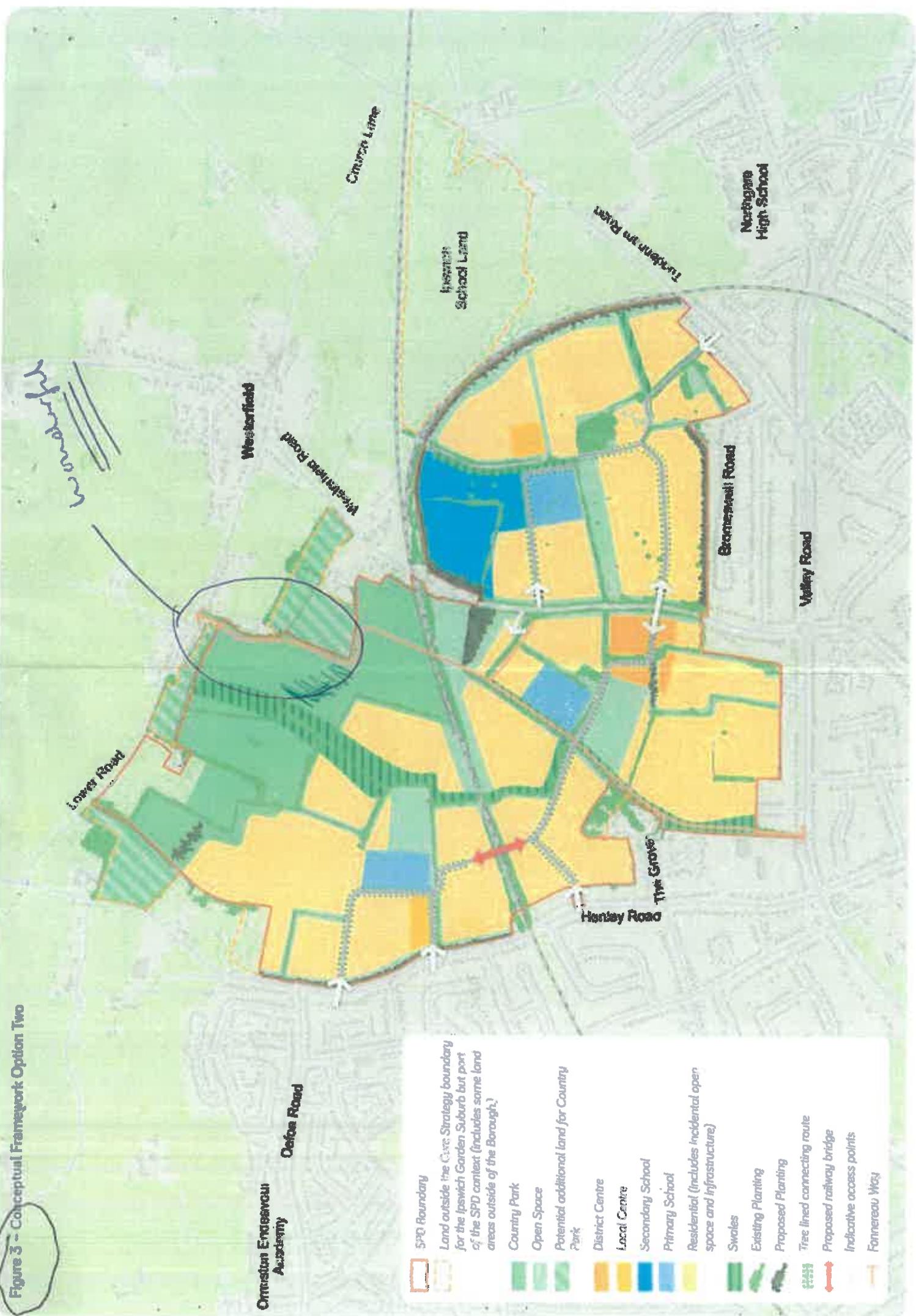
**Adoption of the Ipswich Local Plan Review.**

**PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).



Figure 3 - Conceptual Framework Option Two



# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:

[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:

[www.ipswich.gov.uk](http://www.ipswich.gov.uk)



<b>Consultation document(s) to which this comments form relates:</b>	<b>Draft Ipswich Local Plan</b>
<b>Please return this comments form to:</b>	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

#### PART A PERSONAL DETAILS

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	Councillor	
<b>First name</b>	Timothy	
<b>Last name</b>	Lockington	
<b>Job title (where relevant)</b>	(retired) consultant geriatrician	
<b>Organisation (where relevant)</b>	Ipswich Liberal Democrats	
<b>Address (Please include post code)</b>		
<b>E-mail</b>		
<b>Telephone No.</b>		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation (and client if you are an agent):	Councillor Tim Lockington, Ipswich Liberal Democrats
---	--

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<b>Housing for older and disabled people, Ministries of Housing Communities and local Government 26/06/2019 paragraphs 001 to 0012 ID: 63-001-20190626</b>	<p>Councillor Dr Tim Lockington, comments as Borough Councillor but also a recently retired Ipswich-based consultant geriatrician.</p> <p>National Guidance, 26<sup>th</sup> June 2019, provides clear guidance concerning the needs of independent older people and the provision of suitable homes which will support continuing independence into advanced age. It recognises that there will be a need for specialised housing stock, such as single level bungalows with accessible bathrooms and ease of entry and exit.</p> <p>This guidance does not appear to be reflected in the draft framework with respect to housing and older people page 70: 8.117. This item references projected over-provision of advanced accommodation (sheltered housing – projected surplus 185 Class C3b dwellings).</p> <p>It does not address the 57.8% projected increase in people over 65 nor is there any discussion of the need to develop a housing stock suitable for older people able and wishing to live at a level of independence that does not require C3b sheltered housing. Much of the current older Ipswich Housing stock (such as 2 up 2 down terraced accommodation) is poorly accessible and poorly adaptable to the maintenance of independence for frail older people who become trapped in their own homes and prematurely dependent on care.</p> <p>Current trends, in Ipswich, the acquisition by younger families of bungalows formerly owned and occupied by older people which are then modified, resulting in properties less suitable for an older person, and also the predominance in new builds of 2 and a half or three storey Town Houses, are unhelpful in this regard.</p> <p>Informal discussions with developers of the large-scale “northern-fringe” which is anticipated to meet much of the early identified housing need, does not indicate an awareness or intention to develop accommodation that is older age appropriate, within the mixed housing proposed.,</p> <p>Rather than trapping older people in older and less suitable accommodation, we would request that the inspector reflects on national guidance for the housing needs of older people and recommends appropriate adjustments to the draft Development Framework.</p>
<b>Ipswich Draft Development Plan page 70, 8.117</b>	

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

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Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**M**



## **Felicia Blake**

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**From:** Magor, Lisa <  
**Sent:** 20 January 2020 16:41  
**To:** PlanningPolicy  
**Subject:** IP307-prince of wales drive

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good afternoon,

I am writing to inform you that, as a resident of prince of wales drive, I will be strongly opposing the current development plan by Orwell housing (yet to be submitted).

Kind regards

**Lisa Magor**

This e-mail and any files transmitted with it are confidential. If you are not the intended recipient, any reading, printing, storage, disclosure, copying or any other action taken in respect of this e-mail is prohibited and may be unlawful. If you are not the intended recipient, please notify the sender immediately by using the reply function and then permanently delete what you have received. Content of emails received by this Trust will be subject to disclosure under the Freedom of Information Act 2000, subject to the specified exemptions, including the The General Data Protection Regulation (EU) 2016/679 and Caldicott Guardian principles. East Suffolk and North Essex NHS Foundation Trust, Turner Road, Essex, CO4 5JL

**Felicia Blake**

---

**From:** JIJANA MAKSIMOVIC  
**Sent:** 27 February 2020 11:05  
**Cc:** PlanningPolicy  
**Subject:** Planning premition for South of Patterson rd

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi,

I am a bit concerned that you might be building a new block of Apartments near were I live.  
This area is already well build up and we struggle with parking as every household has 2 or more car's.  
We are all concerned as how this will impact on us living here.

Thank you

Regards Lily Maksimovic

Sent from Yahoo Mail on Android

**Felicia Blake**

---

**From:** Sutton, Georgie  
**Sent:** 02 March 2020 13:33  
**To:** PlanningPolicy  
**Cc:** Pavitt, Tom  
**Subject:** Consultation response Ipswich Local Plan Review Final Draft  
**Attachments:** 200211\_Ipswich\_GS.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/Madam,

Many thanks for giving us the opportunity to respond to the Ipswich Local Plan Review Final Draft. Please find attached our response letter. The first page contains general marine planning information and legal responsibilities. Page two briefly details specific consideration for the Local Plan, and clarifying wording.

In addition to this, if you would like further information on the South East or East Marine Plans, I would be happy to provide a meeting covering general information on marine planning, monitoring and implementation of the marine plans, tools for implementation and an update on the development of marine plans in England.

Please do not hesitate to get in touch if you have any questions.

Kind regards,

Georgie

Georgie Sutton | Marine Planner (East) | Marine Planning | Marine Management Organisation

Address: MMO, Pakefield Road, Lowestoft, Suffolk NR33 0HT

uk

[Explore Marine Plans](#) | [Website](#) | [Twitter](#) | [Facebook](#) | [Linkedin](#) | [Blog](#) | [Instagram](#) | [Flickr](#) | [YouTube](#) |  
[Google+](#) | [Pinterest](#)

The public consultation on the [draft North East](#), [draft North West](#), [draft South East](#) and [draft South West](#) Marine Plans is open until 6 April 2020. Make your representations by following the links.

[Explore Marine Plans - EMP \(digital service\)](#).

To receive marine planning updates and our newsletter enter your details [here](#).

This message has been sent using TLS 1.2

The Marine Management Organisation (MMO) The information contained in this communication is intended for the named recipient(s) only. If you have received this message in error, you are hereby notified that any disclosure, copying, distribution or taking action in reliance of the content is strictly prohibited and may be unlawful. Whilst this email and associated attachments will have been checked for known viruses whilst within MMO systems, we can accept no responsibility once it has left our systems. Communications on the MMO's computer systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.



# Marine Management Organisation

MMO Lowestoft  
Pakefield Road  
Lowestoft  
Suffolk  
NR33 0HT

[www.gov.uk/mmo](http://www.gov.uk/mmo)

Our ref: ID 186

Planning Policy  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

2<sup>nd</sup> March 2020

Dear Sir/Madam,

## MMO Marine Planning and Marine Licensing response to Ipswich Local Plan Review Final Draft Consultation

Thank you for giving us the opportunity to comment on the Ipswich Local Plan Review Final Draft Consultation. The comments provided within this letter refer to the document entitled Ipswich Local Plan Review Final Draft Consultation.

As the marine planning authority for England, the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark.

Marine plans will inform and guide decision makers on development in marine and coastal areas. Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure the necessary considerations are included. In the case of the document stated above, the draft South East Marine Plan is of relevance. The South East Marine Plans cover the area from Landguard Point in Felixstowe to Samphire Hoe near Dover, including the tidal extent of any rivers within this area.

All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act 2009 and any relevant adopted Marine Plan, in this case the draft South East Marine Plan.



or the [UK Marine Policy Statement](#) (MPS) unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#), [Explore Marine Plans](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

### **Marine Licensing**

The Marine and Coastal Access Act 2009 states that a marine licence is required for certain activities carried out within the [UK marine area](#). The MMO is responsible for marine licensing in English waters and for Northern Ireland offshore waters.

The marine licensing team are responsible for consenting and regulating any activity that occurs “below mean high water springs” level that would require a marine licence. These activities can range from mooring private jetties to nuclear power plants and offshore windfarms.

### **Summary notes**

Please see below suggested policies from the East Inshore and East Offshore Marine Plans that we feel are most relevant to your local plan.

These suggested policies have been identified based on the activities and content within the document entitled above. They are provided only as a recommendation and we would suggest your own interpretation of the South East and East Marine Plans is completed:

- [South East Marine Plan](#) policies which may be of relevance:
  - Heritage assets (SE-HER-1), Employment (SE-EMP-1), Air Quality (SE-AIR-1), Biodiversity policies, Cross border co-operation (SE-CBC-1)
- [East Marine Plan](#) policy areas to consider: Governance, Economy, Social, Ecology, and Biodiversity.

### **Further points to note**

**Section 8.78:** You refer to the South East Inshore Marine Plan. This is currently out for consultation until 6<sup>th</sup> April 2020. As the plan is out for consultation, it is now a document for material consideration. We would recommend you mention the [draft South East Marine Plan here](#).

To clarify, the previous engagement periods were not formal consultation, they formed the iterations. Also, there is only one plan for the area in the South East, not an inshore and offshore plan as there is for other areas.

The [East Inshore and East Offshore Marine Plans](#) were adopted in 2014, which covers the adjacent areas, and the north bank of the Orwell. Please ensure correct reference to the South East and East marine plan areas where included.

As previously stated, these are recommendations and we suggest that your own interpretation of the draft South East Marine Plans is completed. We would also recommend you consult the [Explore Marine Plans](#), our marine planning portal, for further information.

**Yours sincerely,**

**Tom Pavitt**  
**Marine Planner (South East)**

**Telephone:**  
**Mobile:**  
**Email:**  
—

**Georgie Sutton**  
**Marine Planner (East)**

**Telephone:**  
**Mobile:**  
**E-mail:**

## **Felicia Blake**

---

**From:** Stewart McCarthy ·  
**Sent:** 26 January 2020 20:35  
**To:** PlanningPolicy  
**Subject:** 23-30 dwellings in Lavenham Road, Ipswich

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Mr & Mrs S McCarthy

Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE

26th January 2020

Dear Sir/madam,

Reference - Planning Application no IP061 (UC064). Former School Site, Lavenham Road, Ipswich.

Proposed use, proposed erection of 23-30 dwellings in Lavenham Road, Ipswich by Ipswich Borough council. We write in connection with the above planning application. We have examined the plans and we know the site well. We wish to object strongly to the development of these 23-30 dwellings in this location. Lavenham Road is a dispersed settlement where development proposals should be considered very carefully. Infilling the green space would and has ruined the character of the area and overwhelmed it. We should also consider the protection of crane manor and its historic values, as this building is grade 2 Listed. Permission should be refused for development of poor design and quality that fails to take the opportunities available for improving the character and quality of the area and the way it functions.

The proposed siting of this development is particularly ill-considered. It is a green space used by many locals for recreation and walking dogs, and building here would diminish the area and the beautiful view. A building has already been built and that has changed our out look forever.

Green spaces play an important role in an urban 'ecosystem' providing a place for physical activity, relaxation, social interaction, community events, and so on. In high-density urban areas, or areas with a high concentration of traffic there will be no clean and there will be a high level of noise pollution.

Access to green open spaces is considered important for mental health and wellbeing. The world health organisation (WHO) has highlighted analysis suggesting that physical activity in a natural environment can help alleviate mild depression and reduce physiological stress indicators.

The proposed 23-30 dwellings will have a negative impact on the area and other properties through noise levels, overlooking, overshadowing, smells, light pollution, loss of natural light, loss of privacy, dust, vibration or late night activities. Then there is the subject of anti-social behaviour, which can have a detrimental effect on one's life, health and wellbeing.

The development will cause traffic problems such as traffic generation, access and safety problems. The proposal reduces the amount of car parking available, it will also cause parking issues. The local infrastructure is not adequate to service the proposed development.

If there is a meeting held on the discussion of this development please contact us and let us know the time and date as we wish to attend. Many thanks.

**Yours sincerely**  
**Mr & Mrs S McCarthy.**

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	<b>Ipswich Local Plan</b> <b>Core Strategies</b> <b>Green Corridors</b>
Please return this comments form to:	<a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	Part A – Personal details  Part B – Your comment(s).

<b>PART A PERSONAL DETAILS</b>		
	1. Personal details	2. Agent's details (if applicable)
Title	Mrs	
First name	Andrea	
Last name	McDonald	
Job title ( <i>where relevant</i> )		
Organisation ( <i>where relevant</i> )		
Address (Please include post code)		
E-mail		
Telephone No.		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Andrea McDonald
--	-----------------

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Core Strategies 5.26 table 2	I do not understand why “cheap car parking” is listed alongside walking/cycling routes and public transport. This would encourage more driving therefore more air pollution
Green Corridors	<p>I can only see arrows pointing towards parks/green areas. These are however not interconnected with each other. There is no coherent walking or cycling route. Especially problematic is the area around the roundabout near St Peters Church. A route from the waterfront/ river towpath is cut up by the gyratory.</p> <p>The river towpath is too narrow to cycle on and its surface keeps deteriorating. Is there any plan improving the towpath? More usage of it would also make people more confident using it.</p> <p>The river path needs to be connected with the waterfront area. Currently driving is still allowed there. It is an area around the university and various cafes and restaurants. Passing traffic also poses danger to children</p>

<b>Document(s) and document part.</b>	<b>Comment(s)</b> (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

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This submission is confirmed

[26305]

**Object Supporting Documents, Ipswich Local Plan Policies Map Final Draft**

Agent: Phase 2 Planning and Development Ltd (Mr Kevin Coleman) [200] (unconfirmed)

Respondent: Mersea Homes Limited [2548]

Received: 02/03/2020 via Web

With regard to land use designations within the IGS, there is a lack of clarity/consistency to terminology, and in any event there is no need for specific land use allocations within the overall IGS, or justification for the specific areas shown.

**Changes to plan:** Removal of land use allocations within the overall IGS allocation, or at least adjustment to the key/text to make clear that all are indicative.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** This representation is part of a suite of representations made by Mersea Homes Ltd which all relate to the effective implementation of development within the Ipswich Garden Suburb. Mersea Homes Ltd is the principal development party for the delivery of the eastern neighbourhood within the Ipswich Garden Suburb (Red House Neighbourhood).

This submission is confirmed

[26306]

### Object Policy DM23 The Density of Residential Development

Agent: Phase 2 Planning and Development Ltd (Mr Kevin Coleman) [200] (unconfirmed)

Respondent: Mersea Homes Limited [2548]

Received: 02/03/2020 via Web

Part (c) of the policy as drafted would not be effective as there is no practical means for ensuring an average of 35 dph across multiple sites, and no justification for stipulating 35 dph on any particular individual site, and no justification for "low-density development" per se.

**Changes to plan:** Please see full representation text for amendments.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** This representation is part of a suite of representations made by Mersea Homes Ltd which all relate to the effective implementation of development within the Ipswich Garden Suburb. Mersea Homes Ltd is the principal development party for the delivery of the eastern neighbourhood within the Ipswich Garden Suburb (Red House Neighbourhood).

This submission is confirmed

[26307]

### Object Policy DM21 Transport and Access in New Developments

Agent: Phase 2 Planning and Development Ltd (Mr Kevin Coleman) [200] (unconfirmed)

Respondent: Mersea Homes Limited [2548]

Received: 02/03/2020 via Web

Whilst no objections are raised in respect of the majority of the provisions of this policy, we are concerned that a requirement that all new development should have access to public transport within 400m is neither justified (in terms of its being a fixed requirement) nor likely to mean that the Plan is effective overall in delivering the number of new homes required, because there are some locations where a strict adherence to 400m is unlikely to be achievable.

**Changes to plan:** Please see full representation text for proposed changes.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** This representation is part of a suite of representations made by Mersea Homes Ltd which all relate to the effective implementation of development within the Ipswich Garden Suburb. Mersea Homes Ltd is the principal development party for the delivery of the eastern neighbourhood within the Ipswich Garden Suburb (Red House Neighbourhood).

This submission is confirmed

[26308]

### Object Policy CS16 Green infrastructure, Sport and Recreation

Agent: Phase 2 Planning and Development Ltd (Mr Kevin Coleman) [200] (unconfirmed)

Respondent: Mersea Homes Limited [2548]

Received: 02/03/2020 via Web

The policy needs to be clear that new development should meet the needs arising from that development, having regard to the Council's standards, and should not be required to remedy existing deficits.

**Changes to plan:** Please see full representation text for suggested amendments.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** This representation is part of a suite of representations made by Mersea Homes Ltd which all relate to the effective implementation of development within the Ipswich Garden Suburb. Mersea Homes Ltd is the principal development party for the delivery of the eastern neighbourhood within the Ipswich Garden Suburb (Red House Neighbourhood).

This submission is confirmed

[26309]

### Object Policy CS15 Education Provision

Agent: Phase 2 Planning and Development Ltd (Mr Kevin Coleman) [200] (unconfirmed)

Respondent: Mersea Homes Limited [2548]

Received: 02/03/2020 via Web

The secondary school site at the Ipswich Garden Suburb should be referenced in the same way as primary school sites i.e. as a broad location (or, as per our representations to the Policies Map, all allocations within the IGS should be removed).

**Changes to plan:** Please see full representation text for proposed amendments.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** This representation is part of a suite of representations made by Mersea Homes Ltd which all relate to the effective implementation of development within the Ipswich Garden Suburb. Mersea Homes Ltd is the principal development party for the delivery of the eastern neighbourhood within the Ipswich Garden Suburb (Red House Neighbourhood).

This submission is confirmed

[26330]

### Object Policy CS10 Ipswich Garden Suburb

Agent: Phase 2 Planning and Development Ltd (Mr Kevin Coleman) [200] (unconfirmed)

Respondent: Mersea Homes Limited [2548]

Received: 02/03/2020 via Web

Mersea Homes Ltd are broadly supportive of Policy CS10 and its various provisions, but in order to ensure effective delivery, there are three aspects of the policy that are considered to be unsound, as follows:

1. Elements of the detailed wording of the policy in relation to site specific matters and the role of the SPD, which relate to Effectiveness;
2. The Affordable Housing provisions, which relate to soundness issues in respect of the justification and the effectiveness of the Policy;
3. The wording of the Policy in respect of viability review provisions.

**Changes to plan:** Please see full representation text for proposed amendments.

Document is not sound

**Representation at examination:** Appearance at the examination

**Reason for appearance:** This representation is part of a suite of representations made by Mersea Homes Ltd which all relate to the effective implementation of development within the Ipswich Garden Suburb. Mersea Homes Ltd is the principal development party for the delivery of the eastern neighbourhood within the Ipswich Garden Suburb (Red House Neighbourhood).

**Felicia Blake**

---

**From:** Stephen Morgan  
**Sent:** 23 February 2020 14:29  
**To:** PlanningPolicy  
**Subject:** Objection to proposed planning

23/02/2020

Dear sir/madam,

Reference IP354 (72 old boatyard) Cullingham Rd ,proposed allocation of 24 dwellings.

I write in connection with the above proposed planning application, I have examined the plans and I know the site well and wish to object strongly to the development of this land for housing.

This would have an impact on an already busy road aswell as having a detrimental effect on the wildlife around the river bank.

Our property would also be overlooked by the development resulting in a loss of privacy.

Noise pollution from the said development would also have an impact.

Cullingham Rd has already issues with parking and this development would make this situation even worse.

Access to the site for heavy machinery would be impossible as the road is not wide enough.

I trust that the above objections will be taken fully into account in determining this application.

Yours sincerely  
Stephen morgan

Sent from my iPhone

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

N



Our Ref: MV/15B901605

14 February 2020

Ipswich Borough Council  
Via email only

[avisonyoung.co.uk](http://avisonyoung.co.uk)

Dear Sir / Madam

**IPSWICH LOCAL PLAN REVIEW FINAL DRAFT  
Representations on behalf of National Grid**

National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.

**Response**

We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.

**Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning their networks.

Please see attached information outlining further guidance on development close to National Grid assets.

If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans

Avison Young is the trading name of GVA Grimley Limited registered in England and Wales number 6382509. Registered office, 3 Brindleyplace, Birmingham B1 2JB

Regulated by RICS

Agent : 2527  
Ref : 2055

and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

**Matt Verlander, Director**

[nationalgrid.uk@avisonyoung.com](mailto:nationalgrid.uk@avisonyoung.com)

Avison Young  
Central Square South  
Orchard Street  
Newcastle upon Tyne  
NE1 3AZ

**Spencer Jefferies, Town Planner**

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid  
National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

**Matt Verlander MRTPI**  
**Director**

**For and on behalf of Avison Young**

### **Guidance on development near National Grid assets**

National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

#### **Electricity assets**

Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

National Grid's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: [www.nationalgrid.com/network-and-assets/working-near-our-assets](http://www.nationalgrid.com/network-and-assets/working-near-our-assets)

#### **Gas assets**

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Grid's '*Guidelines when working near National Grid Gas assets*' can be downloaded here: [www.nationalgridgas.com/land-and-assets/working-near-our-assets](http://www.nationalgridgas.com/land-and-assets/working-near-our-assets)

#### **How to contact National Grid**

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by a proposed development, please contact:

- National Grid's Plant Protection team: [plantprotection@nationalgrid.com](mailto:plantprotection@nationalgrid.com)

Cadent Plant Protection Team  
Block 1  
Brick Kiln Street  
Hinckley  
LE10 0NA  
0800 688 588

or visit the website: <https://www.beforeyoudig.cadentgas.com/login.aspx>



Martyn Fulcher BSc (Hons) PGDip MRTPI  
Head of Development  
Ipswich Borough Council  
planningpolicy@ipswich.gov.uk

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

**BY EMAIL ONLY**

Dear Mr Fulcher

**Ipswich Local Plan Review final draft:**

- (1) Core Strategy and Policies Development Plan Document Review Final Draft;
- (2) Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft;
- (3) Final Draft Ipswich Local Plan 2018 – 2036 Sustainability Appraisal Report (Strategic Environmental Assessment and Sustainability Appraisal);

Thank you for your consultation on the above dated and received by Natural England on 15<sup>th</sup> January 2020.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Local Plan – Core Strategy and Policies Development Plan document review final draft**

We have the following comments on the soundness of the Local Plan.

Natural England is satisfied that our recommendations at earlier stages in the Local Plan process have been taken into account within the Ipswich Local Plan final draft.

We are also satisfied that the Habitats Regulations Assessment has provided a robust assessment of the Ipswich Local Plan final draft, in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) and having regard to relevant caselaw.

We are pleased that the recommendations for the strengthening of policy wording in the HRA screening report have been incorporated within the final draft of the Core Strategy, and issues carried forward into the Appropriate Assessment stage as we would expect, with recommendations for appropriate mitigation.

We are also satisfied that the methodology and baseline information used to inform the report appears to meet the requirements of the SEA Directive [2001/42/EC] and associated guidance. Furthermore the final SA contains a robust assessment of the environmental effects of plan policies and allocations on statutorily designated sites and landscapes including the Orwell Estuary SPA, SSSIs and the Suffolk Coast and Heaths AONB and has taken into account both our advice and the findings of the HRA.

**Therefore, Natural England considers the approach taken with regards to the natural environment to be sound (in accordance with our remit) within the Ipswich Local Plan final draft.**

I hope you have found this letter helpful. If you have any queries relating to the advice in this letter please contact me on [Francesca.shapland@naturalengland.org.uk](mailto:Francesca.shapland@naturalengland.org.uk) or at 0208 0265792.

Yours sincerely

Francesca Shapland  
Lead Adviser, Norfolk & Suffolk Team



Planning and Development  
Ipswich Borough Council  
Grafton House, 15-17 Russell Road  
Ipswich

Katie Brown  
Senior Town Planner i Group Property  
One Eversholt Street, London, NW1 2DN

Date: 02/03/20

Dear Sir/Madam,

**Consultation - Ipswich Local Plan Review Final Draft**

Thank you for consulting Network Rail Infrastructure Ltd on the consultation of the Ipswich Local Plan Review Final Draft. We have reviewed the following documents and our comments can be found below:

- (1) Core Strategy and Policies Development Plan Document Review Final Draft;
- (2) Site Allocations and Policies (Incorporating IP-One Area Action Plan)
- Development Plan Document Review Final Draft;
- (3) Local Plan Policies Maps Final Draft;
- (4) Final Draft Ipswich Local Plan 2018 – 2036 Sustainability Appraisal Report (Strategic Environmental Assessment and Sustainability Appraisals);
- (5) Consultation Statement Ipswich Borough Council Local Plan Review Preferred Options January – March 2019; and
- (6) Supporting Documents.

**Core Strategy:**

It is encouraging to see that Network Rail is mentioned in Policy ISPA2 Strategic Infrastructure Priorities as a working partner of Ipswich Borough Council to enable the delivery of key infrastructure projects.

We support Policy CS5 in relation to Improving Accessibility and agree that Inclusive transport infrastructure should be a priority. This will be especially important with the population increase in the local area that would be generated by the growth in local economy and new housing outlined in Policy CS7 The Amount of Housing Required.

Network Rail have previously responded to planning applications in relation to Policy CS10 Ipswich Garden Suburb, where we have requested further information and mitigation measures in relation to the potential impacts on the Westerfield Level Crossing. We would actively encourage early engagement on strategic development sites to ensure all impacts are identified and taken into consideration at the masterplan stage. This is especially important in the context of Policy CS17 Delivering Infrastructure, where developments will be required to meet the on and off site infrastructure requirements and Policy CS20: Key Transport Proposals.

#### **Site Allocations and Policies:**

Network Rail has no sites to put forward for allocation at present, however should sites come available we will be sure to engage with you at the earliest available opportunity.

#### **Development Management:**

We would like to take this opportunity to remind you that Network Rail is a statutory consultee for any planning application within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of The Town and Country Planning (Development Management Procedure) (England) Order 2015, DMPO) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the DMPO).

#### **Other Considerations:**

If you are planning on doing any work near the railway please contact the Anglia ASPRO team, who can help you with a multitude of works including:

- construction sites near the railway
- utility works (water, electric, gas, cabling etc.)
- radio transmitters
- bridge works
- domestic maintenance (e.g. roof, scaffolding, building repair and maintenance)
- new road schemes
- inspection and surveying
- works within the designated precautionary area of level crossings
- domestic related projects (e.g. house extension) under domestic maintenance (e.g. roof, scaffolding, building repair and maintenance)

**Network Rail**

**Asset Protection Team**

**11th Floor, One Stratford Place**

**Montfichet Road**

**Network Rail Infrastructure Limited Registered Office: Network Rail, One Eversholt Street, London, NW1 2DN Registered In England and Wales No. 2904587 [www.networkrail.co.uk](http://www.networkrail.co.uk)**

Stratford, London  
E20 1EJ

Manager: Julie Houghton  
**NEW ENQUIRIES**  
[AssetProtectionAnglia@networkrail.co.uk](mailto:AssetProtectionAnglia@networkrail.co.uk)

It is worth keeping abreast of Network Rail's Strategic Planning documents for the Anglia Route to be used as an evidence base for the Local Planning Policy documents. The most recent documentation can be downloaded via the following page: <https://www.networkrail.co.uk/running-the-railway/long-term-planning/>

Please feel free to contact me with any queries you may have.

Yours Sincerely

Katie Brown  
Senior Town Planner



## NORTHERN FRINGE PROTECTION GROUP

### Safeguarding the Character of Ipswich

### Comments on the Ipswich Borough Council CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW – FINAL DRAFT January 2020 - Consultation Ending 2nd March 2020

Please find our representation on the above. We want to see a sound evidence-based Core Strategy (CS) in place which will help make Ipswich a more attractive place to live and work. We have made our comments on the CS (which we also reference as the Plan) sequentially although these will relate to the same issue in different sections of the CS. Rather than keep repeating our comments, IBC should assume that our comments on each issue apply throughout the CS to that issue, wherever the issue is mentioned in the CS. We would like to provide oral evidence at the formal planning Inquiry.

#### Summary of key issues

Our main concerns with the CS are mainly in relation to traffic related issues, including delivering the required infrastructure and modal shift and the associated impact on air quality, including the lack of funding to deliver the required improvements. For ease of reference we provide a summary of our key concerns which show that the CS is not sound without modifications to these areas.

#### **Transport and improving accessibility**

1. Previous modelling has shown that many junctions and link roads in Ipswich are already at/near capacity, but this is not addressed in the CS. There is no evidence that proposed growth in the CS is sound in relation to transport proposals in the years up to 2026.
2. Transport modelling shows severe capacity issues in 2026 at many key junctions in and around Ipswich that will result in gridlock but there are no transport infrastructure projects included in the Infrastructure Tables to resolve these capacity constraints. This is especially the case in and around the town centre, Ipswich Garden Suburb and the A1214.
3. The Transport modelling fails to identify when these Ipswich junctions will reach capacity (evidence shows that some already have) and consequently the CS fails to adequately plan for this.
4. IBC is failing to Improve Access in Ipswich in breach of CS5. More needs to be done otherwise the Modal Switch assumptions used in the traffic modelling are too high and unsound resulting in non-compliance with CS20 Transport. The CS is not justified with respect to Improving Access and Transport.
5. The Committee on Climate Change assumes that there will be a 10% transport modal shift by 2050. Where is the evidence that IBC can deliver around 15% modal shift by 2026? – a ridiculously short timeframe for such a high target. Unless IBC can provide evidence that it can achieve higher levels of modal shift than the CCC thinks feasible, the CCC assumption should be used in the modelling work for the CS to be sound.
6. Evidence shows that the existing walking and cycling infrastructure in Ipswich is clearly sub-standard and will not enable delivery of the levels of modal shift required without substantial improvements.

7. There is no funding allocated during the four-year period in IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS<sup>1</sup> to encourage modal shift, for example to change behaviours and improve cycling and pedestrian infrastructure.
8. The CS is not justified as it does not take account of proportionate evidence, especially in relation to modal shift assumptions. The New Evidence database is incomplete as it excludes several key Transport documents, especially those in relation to modal shift and the S106 schedules for the approved Ipswich Garden suburb developments which have not been made available to the Public in time to examine as part of this Consultation.
9. We are concerned that the two road bridges (and country park) may not be delivered in time (February 2022) to receive the £9.8m Housing Infrastructure Funding. If this is the case, then the CS is unsound unless IBC can confirm alternative funding will be available.
10. We are concerned that the CS is not completely positively prepared as it fails to fully assess transport infrastructure requirements, including walking and cycling infrastructure, especially in relation to timing of delivery (and as sewage infrastructure requirements).

### **Air Quality and the environment**

11. The CS is not consistent with national air quality policy as it fails to ensure compliance with legally binding limits. There needs to be a requirement to comply with these for the CS to be sound.
12. The CS needs to strengthen the commitment to Improve Air Quality as there has been no real improvement in Air Quality in Ipswich over the past decade with the number of AQMAs in Ipswich increasing.
13. There is no funding allocated during the 4-year period in IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS for improving air quality.
14. There is no Air Quality Assessment provided as part of this consultation. This needs to be completed urgently and needs to include assessments for the early years of planned developments, all construction-related traffic (including sewage infrastructure projects) and rail/sea traffic. It needs to examine the impacts of different levels of modal shift rather than assume the unsubstantiated, extremely high levels of modal shift assumed in the transport assessment will be delivered by 2026 and thereafter.
15. There is little point in undertaking an Air Quality Assessment in 2036 as the ban on non-electric vehicles will have been implemented. It is the early years of the CS where air quality is most likely to be worst. We believe that an earlier assessment than 2026 is therefore required e.g. 2023 and perhaps 2029/30 (prior to the ban on non-electric vehicles) rather than 2036 when there will be a significant number of electric vehicles.
16. At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency. The CS needs to be updated to incorporate this to be sound.
17. We strongly object to the re-designation of the Ipswich "green rim" to "green trails". This is in breach of DM13 and unsound.
18. The current situation regarding flood risk assessment within the CS is ambiguous and somewhat confused. This needs to be clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be sound and understood by residents.
19. A key problem with the Sustainability Appraisal, Habitats Assessment and Health Impact Assessment are that they simply assume that the CS will be fully implemented and that full funding for all the measures identified in the CS will be secured. There is no evidence that IBC (in conjunction with SCC) can deliver the substantial improvements in walking, cycling and bus infrastructure, improved road infrastructure and the unprecedented levels of modal shift

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<sup>1</sup> <https://democracy.ipswich.gov.uk/documents/s27023/C-19-19%20MTFP%20Appendix%201%20-Financial%20Strategies%20and%20Medium%20Term%20Financial%20Plan%202020-21%20Onwards.pdf>

required for the CS to be sound. IBC and SCC's track record in these areas is dire – what evidence is there that this will change?

20. The Sustainability Assessment is incomplete and underplays many key issues. It needs to fully assess air quality impacts including from rail and sea, the impacts of the additional road infrastructure required to prevent junctions reaching capacity , the proposed re-designation of the Green Rim, alternatives to building on Humber Doucy Lane (and that Suffolk Coastal no longer needs this land to meet its housing target), flood risk and the impacts of the new sewage infrastructure that will be required to deliver the CS. It especially needs to assess the robustness of the CS if the unprecedented levels of modal shift are not achieved.
21. The same issues relating to the Sustainability Appraisal apply to the Health Impact Assessment.
22. The Habitats Assessment also needs to take account of the same issues.

### **Other**

23. There are still no firm proposals for new sewage infrastructure that is required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables.
24. The proposal to allow development in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road is not justified and therefore unsound. Land in the centre of Ipswich earmarked for expanded retail and car parking (which we believe is surplus to requirements), should be used for new homes instead. There is no SA of this viable alternative.
25. The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector<sup>2</sup> from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756). Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) it had included in its final draft plan<sup>3</sup> (paragraph 12.209). The SA fails to assess this.
26. Specific Objectives are required to ensure delivery of key aspects of the CS such as improving transport infrastructure, improving air quality, delivering modal shift and improving accessibility are required. These need to be monitored and reported on to ensure the CS is effective.

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<sup>2</sup> [https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk\\_Coastal\\_Local\\_Plan\\_Post\\_hearings\\_letter.pdf](https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk_Coastal_Local_Plan_Post_hearings_letter.pdf)

<sup>3</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

## **Consultation Statement Ipswich Borough Council Local Plan Review Preferred Options**

**January - March 2019**

We are concerned that our comments on CS5 and CS20 in relation to the transport modelling and modal shift (and associated air quality issues) have not been adequately considered. IBC appears to be adopting the approach that SCC's Transport Mitigation Strategy for the Ipswich Strategic Policy Area (IPSA)<sup>4</sup> will totally resolve all the traffic issues and fully deliver the required levels of modal shift for the CS to be sound, without substantiating this with any evidence that it will. Until such evidence is provided the CS cannot be considered effective or justified. It is particularly disappointing that the Transport Mitigation Strategy and other relevant modal shift documents have not been included in the Evidence Base. We agree that extremely high modal shift levels will be needed but believe that the new infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary for the CS to be sound. The level of funding needed to deliver this is massively under-estimated. There is also a significant shortfall in guaranteed funding for the insufficient measures identified in the Plan. IBC has yet to respond to these concerns.

### **Para 5.25**

Improving air quality in the increasing number of Ipswich AQMAs (now five) needs to be added as a key challenge as IBC is legally required to reduce pollution levels to legally binding limits and has failed to do so; there have been no material improvements to air quality and IBC is non-compliant with its CS in this respect. The planned growth levels for Ipswich will further challenge this requirement.

Given the high levels of modal shift required, IBC should be “delivering high levels of modal shift” rather than just “guiding as many trips as possible to sustainable modes”. The current draft underestimates the difficulty and importance of the task.

Meeting the Climate Emergency also needs to be added as a key challenge as Ipswich Borough Council has committed to tackling this issue. Not to include it would be unsound.

**Para 5.26 Table 2** – for ease of reference we have included all our comments on flood risk below, but these should be considered for all other references of flood risk in the CS.

This states that “*In addition, as part of the final draft Local Plan, a refresh is being prepared of the Ipswich Strategic Flood Risk Assessment (SFRA).*” Paragraph 6.1.6 then states that “*The Council’s Level 2 Strategic Flood Risk Assessment (SFRA) was revised in 2019. It provides guidance on residual flood risk both for the situation before and after completion of the flood barrier. The SFRA also suggests a framework for safe development. The safety framework is detailed in the Council’s Development and Flood Risk SPD (September 2013) which is in the process of being updated*”. How can a ‘framework’ developed in a document (SFRA) dated 2019 be detailed in an SPD dated 2013? It is not clear which Safety Framework applies to the CS.

However, the IBC FRA webpage<sup>5</sup> only references the 2011 SFRA version and does not show the 2019 version referenced above. We also note that the Local Plan New Evidence database includes a draft 2020 SFRA as well. It is not clear when or if this has been adopted. The IBC website also states that

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<sup>4</sup> <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/IPSA-Transport-Mitigation-v13F.pdf>

<sup>5</sup> <https://www.ipswich.gov.uk/content/strategic-flood-risk-assessment-sfra>

the Flood Risk SPD “*was first updated in May 2014 and has subsequently been updated in January 2016 to reflect changes to national and local policy and guidance*<sup>6</sup>.”

Paragraph 8.45 states “*On flood risk, it concludes that an updated Strategic Flood Risk Assessment is needed to model the boundaries of Flood Zones 3a and b; drainage strategies should be prepared for all sites; and the sequential and exception tests need to be applied to all sites in flood zones 2 and 3.*” It is not clear if the draft 2020 SFRA meets this requirement. The paragraph then goes onto state that “*Further guidance is contained in the Development and Flood Risk Supplementary Planning Document 2016*”. Clearly the 2016 SPD cannot possibly adequately reflect the draft 2020 SFRA.

Paragraph 8.46 states that “*the Ipswich Surface Water Management Plan*<sup>7</sup> was produced in [June] 2012 and is currently under review”. This is clearly obsolete and fails to take account of climate change. Under the NPPF hierarchy for managing flood risk, this is the key document/means of controlling flood risk. This review needs to be completed urgently and incorporated into the CS for it to be sound. We are concerned that IBC no longer has a Drainage Team/Officer that can undertake this important work and the loss of such expertise leaves Ipswich and its residents at greater risk of flooding.

Paragraph 8.225 states that “*Part C of this document includes policies relating to flooding to reflect the NPPF and the detailed findings of the Ipswich Strategic Flood Risk Assessment*”. But it does not reference which SFRA version it relates to. IBC needs to confirm that this is compliant with the draft SFRA 2020

Policy DM4 states that “*it [development] will be adequately protected from flooding in accordance with adopted standards of the Suffolk Flood Risk Management Strategy*<sup>8</sup>;” However, the document was produced in 2016 so doesn’t include the full risk of flooding from climate change so there is no assurance that development will be adequately protected.

Suffolk County Council’s Preliminary Flood Risk Assessment (PFRA) was published in 2011<sup>9</sup> and had a 3 page addendum<sup>10</sup> in 2017. A Preliminary Flood Risk Assessment (PFRA) is an assessment of floods that have taken place in the past and floods that could take place in the future. It considers flooding from surface water runoff, groundwater and ordinary watercourses. This is also therefore out of date and will not fully take account of climate change. We believe an update is required to ensure the CS is sound.

In the 2017 Addendum, SCC used a national data set to predict flood risk, but these do not include climate change allowance output, so SCC have projected the potential number of properties at risk for the 0.5% AEP for the PFRA. The results show that Ipswich is the area at greatest flood risk and has been identified as a Flood risk area (FRA) for the purposes of the Flood Risk Regulations (2009) second planning cycle. The Addendum states that “*To improve SCC understanding of climate change in priority areas, local modelling updates will assess the impact of climate change.*” It is not clear

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<sup>6</sup> <https://www.ipswich.gov.uk/content/development-and-flood-risk-spd>

<sup>7</sup> <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Surface-Water-Management-Plans/Ipswich-Flood-Risk-Management-Strategy-v12.pdf>

<sup>8</sup> <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/2018-Strategy-Documents/2016-04-Suffolk-Flood-Risk-Management-Strategy-v12.pdf>

<sup>9</sup> <https://www.suffolk.gov.uk/assets/Roads-and-transport/Flooding-and-drainage/SUFFOLK-PFRA-REPORT-FINAL.pdf>

<sup>10</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/698246/PFRA\\_Suffolk\\_County\\_Council\\_2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698246/PFRA_Suffolk_County_Council_2017.pdf)

whether this modelling has been done or how it has been included in the CS. Clearly this needs to be incorporated into the CS for the CS to be sound.

The current situation regarding flood risk assessment within the CS is ambiguous and confusing and makes the CS flood risk situation impossible to understand for the general public. This needs to be clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be understood by residents and for it to be sound. Given the current terrible flooding and that Ipswich is an FRA, this is a key issue that needs correcting.

### **Para 6.7**

The Vision needs to include an improvement in air quality levels and compliance with legally binding targets that are currently exceeded. IBC should have a Strategic Policy to comply with legally binding air quality targets and eradicate AQMAs within Ipswich for the benefit and protection of residents. The Climate Emergency also needs to be recognised in the Vision (please see our comments under CS1).

### **Objective 6.8.4**

This Objective needs to be strengthened to recognise the Climate Emergency for the CS to be sound (please see our comments under CS1).

### **Objective 6.8 5**

It is not clear what the 2004 levels are or how progress against these will be measured; 2004 emissions levels should be included in the CS for completeness so that the target is clear. For example, do 2004 measuring locations correspond with the current measuring locations and if not, how will IBC determine whether levels have returned to 2004? Furthermore, it is not clear when IBC aim to return to 2004 levels. This needs to be done as a matter of urgency and should not be left to 2036 as would be possible under the current Plan, by which time many more Ipswich residents will have died prematurely. IBC needs to comply with legally binding targets otherwise its CS is unsound.

### **Objective 6.8 6**

IBC has decided to remove its previous Objective to achieve modal shift of 15% by 2031 in the current Local Plan and needs to be asked why it has done this given this is still required for the CS to be sound. SCC Transport modelling (which we discuss later) confirms that major modal shift is required to deliver the CS (e.g. c15.5% by 2026 for existing journeys). Given the importance of achieving high levels of modal shift to deliver the Plan, it is imperative that a modal shift target for 2026 is included for the CS to be sound. IBC needs to explain why it no longer thinks having a modal shift target is important.

Ipswich CS Authority Monitoring Report 13, 2017/18 June 2019 fails to adequately report back on the current Objective 6 f. TARGET: To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031. Simply stating "*The Travel Ipswich measures have now been implemented. This target will be reviewed through the Ipswich Local Plan review.*" We believe the reason that the target has not been reported on is that little or no progress has been made and the target has been removed because IBC knows it cannot be achieved. IBC needs to report the modal shift levels achieved through Travel Ipswich (formerly known as Ipswich – Transport Fit for the 21<sup>st</sup> Century) as this will indicate what levels of modal shift can be achieved in Ipswich.

We also note that Appendix5, pg 55 states “*The 2018 Travel to Work survey ran from the 7th May to 29th June 2018, outside the 2017/18 monitoring period. The 2018 results show that driving (single occupant and car share) remains the most frequently used mode of travel at 64.7% in 2018, an increase from 62.6% in 2017. The percentage of those travelling as a single occupant has risen compared to last year and currently stands at 62.6%, 3.5% higher than in 2017.*” This illustrates how difficult the required levels of modal switching will be to achieve, without which the CS is clearly unsound.

We believe IBC has failed to make any progress on the modal shift target of 15% by 2031. It clearly needs to provide evidence that it can deliver the required modal shift levels identified by SCC (e.g. c15.5% by 2026 for existing journeys) for the CS to be sound. If not, the CS needs to be revised accordingly to be sound.

IBS states that “*Additional east-west highway capacity could be provided within the plan period*” and needs to illustrate what it means by this and whether such capacity is required for the CS to be sound.

Paragraph 8.19, which states “*In addition to the integrated transport solutions, including bus network improvements within the town and increased capacity of the local rail offering, a northern route around Ipswich is expected to be needed to enable growth in the longer term.*” Ipswich Borough Council states support for such a route. We would like to draw attention to the article in the Ipswich Star (27 February 2019<sup>11</sup>) where the leader of Ipswich Borough Council, David Ellesmere, is quoted as saying “*A northern bypass is a priority infrastructure project for Ipswich*”. A position that was repeated in the East Anglian Daily Times Article<sup>12</sup> published on 22/02/2020 “It remains our position that the best solution would be the construction of the inner route of the northern bypass [to ease traffic problems in Ipswich]. Both the previous Labour and current Conservative Ipswich MPs have also argued for a northern route as a priority for Ipswich. This paragraph and the CS need to be updated to take account of the decision that the northern route will NOT be progressed further by SCC. Ipswich Borough Council needs to explain why its elected leader clearly believes that Ipswich cannot cope with existing volumes of traffic and that it is sound for the CS to increase traffic further. The Local Plan also needs to recognise that Suffolk County Council is also concerned about the ability for Ipswich to manage the existing volumes of traffic and announced on 18 February 2020 that it is setting up a taskforce to look at new ways of tackling the town's traffic problems. In response to the creation of the Suffolk County Council taskforce to improve Ipswich traffic David Ellesmere is quoted in the East Anglian Daily Times as demanding “*a new link road connecting Europa Way with Bramford Road to alleviate traffic pressures, and work to explore a new road link connecting London Road, Hadleigh Road and Sproughton Road*”.

We agree with the leader of Ipswich Borough Council and its local MP that some form of northern route is still required for IBC to deliver its targets in a sound manner. The SCC consultation exercise shows that many Ipswich residents share this view. Unless there is a huge change in public attitudes and behaviour plus substantial investment in other means of sustainable travel, improving the existing road infrastructure, including new technology, homeworking incentives, off-peak travel pricing incentives, regulatory instruments etc, a northern route is required to deliver the Plan. Currently IBC has insufficient firm proposals or funding to deliver the required 2026 modal shifting target and subsequent modal shift levels throughout the CS period. The CS is therefore unsound as it lacks a credible transport solution that would support the proposed levels of growth.

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<sup>11</sup> <https://www.ipswichstar.co.uk/news/ipswich-northern-bypass-latest-1-5908955>

<sup>12</sup> <https://www.eadt.co.uk/news/ellesemere-on-travel-taskforce-1-6527021>

**Para 6.17** - this should be considered as our representation for this site in respect of the consultation on the associated Site Allocations & Policies.

We challenge the need for future development after 2031 in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road, which is no longer required by Suffolk Coastal to meet its housing target as this has been reduced substantially by the Planning Inspector:

1. **The Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018**  
Section 4.3 Land Northeast of Ipswich IP2 (Suffolk Coastal) recognises the sensitivity of the open land between the edge of suburban Ipswich and the villages of Westerfield and Rushmere and that the area forms an important corridor of land. It states that "opportunities lie in the strengthening of landscape structure, softening of the urban edge and reinforcement and creation of corridors which penetrate the urban area". It concludes that the area is "sensitive to development" and "care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town". These comments will clearly also apply to the open land within the Ipswich boundary. Even more so as the land is nearest the edge of suburban Ipswich and there is substantially less open land within the Ipswich boundary than Suffolk Coastal. We also note that this report was produced before the Ipswich draft CS proposal. Therefore, it does not consider the impacts of building on the open countryside within the Ipswich boundary, which will increase the sensitivity of the Land Northeast of Ipswich IP2 as described in this report. In our view, this land is too important and sensitive to be built on, especially as it will result in the need for an additional primary school, which has additional traffic implications.
2. We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new homes. Town centre homes are likely to have a far lower impact on traffic congestion and air quality than on the outskirts of Ipswich. We believe that there are opportunities to convert some of the existing excess town centre retail property into new homes. This approach should be used instead of building on at the northern end of Humber Doucy Lane and Tuddenham Road, which will add to traffic congestion into the town centre and along Valley/Rd/Colchester Rd etc. We note that Ipswich Central is also advocating an increase to the number of homes in the town centre<sup>13</sup>. This will help improve the town centre and the night-time economy, reduce traffic into the centre town (compared to other new build sites), facilitate modal shift and improve air quality. Why has this option not been considered by IBC?
3. We believe that the Parking Strategy over-estimates the parking demand, and hence the required land, for town centre parking and that this brownfield land would be better used for housing rather than the previously designated countryside at Humber Doucy Lane.
4. Traffic modelling shows that traffic from the development will further increase traffic at junctions that are already over-capacity without any road infrastructure projects proposed to rectify this forecast over-capacity.
5. The allocation of this land for housing is in breach of Policy CS16 regarding the protection and enhancement of green corridors and the CS "Green Rim" (regardless of the land having been designated as countryside). In our view, this is why Ipswich Borough Council wants to re-designate the green rim as bike and cycle trails without any justification and a distinct lack of cycle trails in the "green trails". We discuss this in detail in our comments to Chapter 7, which should also be considered here.
6. The allocation of this land for housing is in breach of the current CS. POLICY DM8: The Natural Environment POLICY DM10: Green Corridors. It is also counter to the principles of POLICY DM11: Countryside and should remain classified as part of the Green Rim. It is also

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<sup>13</sup> <https://www.ipswichstar.co.uk/news/ipswich-needs-4-000-new-homes-1-6516012>

effectively non-compliant with Paragraph 8.80 as it is inconceivable there will be net gains in biodiversity and green infrastructure by building on the green rim.

7. The allocation of this land for housing is in breach of the current CS in relation to the corresponding Policies and Diagram 3 The Ipswich Core Diagram where it is designated as Green Rim. IBC has not provided enough evidence to justify this change of classification from countryside.
8. The North East Character Study recognises the benefits of this site as “a rural buffer” as open fields/countryside to urban Ipswich. Given the lack of such land in Ipswich, it is too important to be lost.
9. The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector<sup>14</sup> from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756) i.e. a reduction of 720 homes over the Plan period. Clearly Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) that it had included in its final draft plan<sup>15</sup> (paragraph 12.209) and the allocation of this land is therefore not sound.

Regardless, there should be no development of this land until the completion of the IGS. This needs to be made clear in the CS. For the CS to be effective, the Sustainability Appraisal needs to fully assess the implications on building on this site and whether delivering more homes in the town centre instead of retail expansion might be a more sustainable option.

## **CHAPTER 7: The Key Diagram** (and all other references to the green rim/trail)

We strongly disagree with the proposed change to replace “green rim” with “green trail” in (v) The ecological network, green corridor and green rim approach to strategic green infrastructure (policy CS16). The proposed change to the green rim has not been assessed by the Habitats Regulations Assessment (HRA) and needs to be included in the HRA accordingly.

The existing green rim is an asset and should be protected by adding it to Policy CS4, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it and hence destroy it.

The Ipswich Local Plan – Regulation 19 draft presented at the Council Meeting on 8<sup>th</sup> January 2020 states, in the last paragraph of Section 2.47 The Development Management, that “*There has been some confusion arising from the Preferred Options consultation responses on the purpose of the ‘green rim’, which are principally orbital routes for walking and cycling around the periphery of the Borough although it is acknowledged that they are important routes for biodiversity and the wider ecological network. It is suggested that these be renamed as ‘green trails’ which shows that these areas are also connected with walking and cycling.*”

It is our view that the Council in its paper is mis-leading Councillors as the concept of corridors and the green rim was for the corridors to provide access on foot or by cycle to the countryside surrounding Ipswich. That countryside then became known as the green rim and the intention was for the green rim to be protected from development. We note that in subsequent CSs the green rim has been considerably reduced in size, which demonstrates the Council’s lack of commitment to protecting open space and improving biodiversity in its own Plans. The change in definition is effectively non-compliant with policy DM8.

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<sup>14</sup> [https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk\\_Coastal\\_Local\\_Plan\\_Post\\_hearings\\_letter.pdf](https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk_Coastal_Local_Plan_Post_hearings_letter.pdf)

<sup>15</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

In our view, the Council is doing this so that it can bring forward land around Humber Doucy Lane, which has previously been designated as countryside, and then as part of the green rim, for development in the revised draft of the CS by removing the protection that it currently has. If the Council wants to do this then it should be clear and transparent that it proposes to build on land previously designated as countryside/green rim rather than by deviously trying to re-designate the land as a pedestrian/cycle green trail (which was never the intention of previous CSs). We believe that there are other brownfield sites in Ipswich that could be used instead.

In Appendix 1, we illustrate the history of the green rim/corridors in various drafts of the CS below and include a comparison of actual cycle routes to the revised green trails demonstrating that it is the Council that is “confused” about the original purpose of the green rim. We also note that there is no mention of the Green Rim (or Green Trail) being used for cycling in the Ipswich Cycling Strategy<sup>16</sup> adopted in March 2016 as part of the CS.

## **Chapter 8 Scale and location of growth**

We have argued for many years that previous homes and employment targets set by Ipswich Borough Council were too high, unrealistic and based upon flawed evidence. It is now clear that previous Plans were unsound and by their very nature were therefore sub-optimal for Ipswich as we argued strongly at the time. It is disappointing that Ipswich Borough Council has taken so long to accept this. We believe the proposed lower targets are more realistic. We agree with IBC that it has established a 5-year land supply of 5.06 years including a 20% buffer or contingency in the 5-year supply.

## **Policy ISPA2 Strategic Infrastructure Priorities**

This needs to include the following highway schemes that SCC assumes will proceed in Ipswich in its ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2 along with the dates they are required by. Without these being implemented the modelling work, and hence the CS is unsound.

1. Bixley Road / Heath Road / Foxhall Road Additional lane NB for Bixley Road / Additional lane SB for Heath Road
2. Nacton Road / Maryon Road Turn WB Nacton to two lanes, and EB Nacton to one lane
3. Upper Orwell Street Changed to one-way southbound from St Helen's Street
4. St Helen's Street / Bond Street Bus lane removal (we question how this will improve bus services?)
5. Ipswich Radial Corridor Route improvements - Felixstowe Road. Capacity increase to Felixstowe Road & Bixley Road arms of roundabout with A1156 Bucklesham Road. Capacity increase at Bixley Road / Ashdown Way junction
6. Ipswich Garden Suburb – Henley Gate Two signalised junctions included as part of site access onto Henley Road
7. Ipswich Garden Suburb – Fonnereau Priority controlled junction included on Westerfield Road in relation to access
8. Ipswich Garden Suburb – Red Hill Farm Two priority-controlled junctions included on Westerfield Road, north and south of Fonnereau access junction
9. A1214 Valley Road / Westerfield Road Increased capacity modelled on A1214 approaches to roundabout due to flares
10. A1214 Valley Road / Tuddenham Road Increased capacity modelled on A1214 approaches to roundabout due to flares

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<sup>16</sup> [https://www.ipswich.gov.uk/sites/default/files/cycling\\_strategy\\_spd.pdf](https://www.ipswich.gov.uk/sites/default/files/cycling_strategy_spd.pdf)

11. Europa Way link road Link road between Sproughton Road and Bramford Road, extension of Europa Way with priority-controlled roundabouts
12. A1214 / Bell Lane Ban of right turn from A1214 onto Dr Watson Lane. Signalised junction of A1214 / Bell Lane changed to priority-controlled roundabout [we note this is not in Ipswich and appears to have been incorrectly grouped under Ipswich]

This list excludes improvements to the Henley Road/Dale Hall Lane junctions with Valley Road which are required to be delivered by Crest Nicholson after by occupation of the 299th home on its Henley Grange IGS site (as stated in the planning application Decision Notice). It needs to be confirmed whether this infrastructure project has been included and modelled accordingly. It needs to be added to the list of projects.

We support the inclusion of sewage infrastructure in ISPA2. We have argued for this for many years and its inclusion is long overdue. We believe specific reference to it being required for the delivery of the Ipswich Garden Suburb, which still has no agreed site-wide sewage infrastructure solution after over 10 years of planning for one.

#### **Policy IPSA4 and Paragraphs 8.24-8.26**

Please see comments on Paragraph 6.17. Paragraph 8.24 states that development will “*follow the delivery of the Ipswich Garden Suburb*”. We disagree on the need for this land to be developed, but if it is then it needs to be made clear throughout the CS document that this can only happen following the delivery of the IGS development, rather than “appropriately phased”. Without this stipulation it could detrimentally impact on demand for homes at the IGS leading to a stalled and incomplete development of the IGS for many years. It is premature to phase it with the IGS development rather than at the end of the IGS development.

#### **Policy CS1**

Sustainable Development needs to reflect the legal requirement to comply with Air Quality targets, as well as considering them elsewhere in the CS for the CS to be sound.

At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. This commitment will clearly impact on the CS and needs to be referenced here and in relation to other relevant policies e.g. DM1 and DM2 for the CS to be sound. This would be consistent with the Court of Appeal’s ruling on 27/02/20 that the government’s Heathrow’s expansion decision was unlawful because it did not take climate commitments into account.

#### **Policy CS4, Policy CS17 and DM8**

The existing green rim is an asset and should be protected, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it (see above). It should be included in CS4 accordingly for the CS to be sound.

We have some concern that IBC may not be providing enough recreational mitigation for its RAMSAR sites. It is not clear what RAMS S106 payments (agreed on 30/01/20) have been agreed with CBRE and Crest IGS sites as the S106 have not been made publicly available by IBC with its Decision Notice in February 2020 on granting outline application approval.

The Suffolk Coast European Sites Recreational Disturbance Avoidance and Mitigation Strategy

## Supplementary Planning Document (SPD) 2019

This was approved by the Executive on 7th January 2020, which implies the S106 agreements should include RAMS mitigation payments as they were agreed after the SPD was approved by the Executive.

We note that Paragraph 2.4 states "*It should be noted that some residential schemes, particularly those located close to a European Site boundary or large scale developments, are likely to need to provide additional mitigation measures (in addition to the tariff) such as Suitable Alternative Natural Green Space (SANGS) or green infrastructure measures. This would need to be assessed through a project level Habitats Regulations Assessment (HRA) (including Appropriate Assessment).*" Therefore, it would appear that the delivery of the Country Park is therefore an additional requirement to the RAMS tariffs.

However, IBC did not request any S106 contributions from either CREST or CBRE for any of their homes on the IGS for recreational mitigation when the outline application was approved subject a number of conditions at the Planning & Development Committee Wednesday 4th April 2018  
CREST - Para 5.16 of <https://democracy.ipswich.gov.uk/documents/s20697/Item%2001.pdf> other than £7.5k HRA for monitoring  
CBRE - Section 10 of <https://democracy.ipswich.gov.uk/documents/s20700/Item%2002.pdf> other than £7.5k HRA for monitoring

The SPD also states

### *3.2 What types of application does this apply to?*

*The Suffolk Coast RAMS tariff applies to all full applications, outline applications, hybrid applications, permitted development, and reserved matters applications where no contribution was made at the outline application or hybrid application stage.*

*Sites that already have planning permission will not be required to pay any additional mitigation sum, unless they are resubmitted for consideration.*

*3.3 The Suffolk Coast RAMS contribution is payable in addition to any Community Infrastructure Levy (CIL) liability and/or any other S106 or S278 contributions for other types of contribution and there may be other site-specific mitigation requirements in respect of European Sites and ecology.*

If there are no RAMS tariffs included in the S106 agreements this could be in breach of this SPD, Policy CS4, CS17 and Policy DM31 The Natural Environment of the current Ipswich CS. It also means the new CS would be unsound in relation to CS4 CS17 and DM 8 The Natural Environment as there is no means of funding the required. We believe further examination of the issue is required to provide confidence that the CS is sound in relation to this issue.

## Policy CS5 Improving Accessibility

States that the Council will work with the Highway Authority including through the Local Transport Plan to manage travel demand in Ipswich and maximise sustainable transport solutions and in doing so will prioritise the development of an integrated cycle network. During the duration of the current CS and despite the agreement of the Cycling SPD, we have seen no improvements to the cycle network. Indeed, the only major changes that we are aware of are:

- The removal of the dedicated cycle lane on Felixstowe Road out of Ipswich towards Sainsburys.
- The construction of steps on the Cornhill effectively blocks off the previous direct cycle route between Lloyds Avenue and Princes Street. This was the only cross-town cycle route that did

not involve the use of dangerous counter-flow cycle lanes (Northgate Street and Museum Street) in the town centre. Neither of these counter-flow cycle lanes meet cycle lane guidelines<sup>17</sup>.

Both these changes, especially the town centre one, result in a more segregated cycle network and will deter cyclists rather than encourage them. We also note that the cycle route along the Christchurch Park Bridleway remains in a dangerous state of repair since the current CS was approved. This shows a distinct lack of commitment to even maintaining the existing cycle network.

We also note that much of the Ipswich cycling infrastructure is sub-standard and fails to comply with recommended minimum standards for cycle lane width for both dedicated cycle lanes and shared pedestrian/cycle routes. The latter acts as a barrier to both walking and cycling. The required levels of modal shift will not be delivered with such sub-standard infrastructure.

Paragraph 33 of the Transport Topic paper states that "*There has also been a variety of cycling and walking initiatives built around the balanced transport plan for Ipswich*" but fails to provide any evidence of this. The Council needs to detail the initiatives delivered by the Council in the last few years since the adoption of the current Core Strategy and the Cycling Strategy Supplementary Planning Document in March 2016 and the current CS in February 2017 and advise on the level of modal shift has been achieved by them. We have not been able to find any evidence of the levels of modal shift achieved by these initiatives (nor what the specific initiatives actually are). In relation to the provision of cycling infrastructure in the current CS, there seems to have been no progress in delivering the requirements of:

- CS5 Improving Accessibility Enables access across town safely and conveniently by foot and by bicycle - work with the Highway Authority through the Local Transport Plan prioritise the development of an integrated cycle network.
- CS16 Green infrastructure, Sport and Recreation Strengthens ecological networks that link inner and outer parts of the Borough by providing walking and cycling routes.
- CS20 Key Transport Proposals Seeks improved cycling and walking routes between key nodes.
- SP15 Improving Pedestrian and Cycle Routes Support improvements to pedestrian and cycle routes within the IP-One area and linking the town centre to residential areas and beyond.

The level of achievement by IBC will help determine how effective the CS is likely to be in delivering its accessibility and modal shift objectives and whether it is sound in these respects.

The SUFFOLK COUNTY COUNCIL Draft Local Cycling & Walking Infrastructure Plan (dated 15/03/2019 presented at Suffolk Cabinet 20/January 2020)

This identifies the requirements and options for planning of future opportunities to make improvements to the cycling and walking network. We are disappointed that this document has not been included by IBC in the Evidence Base as it clearly shows the poor existing walking and cycling infrastructure in Ipswich. The draft LCWIP assesses a number of corridors in Ipswich but does not include any actions or funding to improve these. The corridors are assessed using WRAT and CLOS

<sup>17</sup> The desirable minimum width of any contraflow lane is 2m. Where space is constrained it may be reduced to an absolute minimum of 1.5m. The width of the with-flow traffic lane may be as little as 2.5m where there are low volumes of heavy goods vehicles and the servicing needs of shops and other premises are met by off-street loading or other means. The preferred minimum width is 3m as this is less likely to cause with-flow traffic to encroach upon the cycle lane. Cycling England A.06 Contra-Flow Cycling.

assessment tools.

As part of the Welsh Active Travel Design Guidance a Walking Route Audit Tool (WRAT) was developed to assist Local Authorities with the auditing of walking routes. The auditing methodology targets the five core design outcomes for pedestrian infrastructure, which are similar to those for cycling. These are: • attractiveness • comfort • directness • safety • coherence. Each design outcome has several sub-categories that are each scored 0-2 with a score of 70% (28/40) being normally regarded as the minimum provision overall.

CLOS (cycle level of service) scores Cycling Level of Service is an audit tool developed by Transport for London. It is designed to assess the quality of cycling provision in existing (and proposed) schemes, with a final score out of 100. Good (Dutch-quality) schemes should be scoring between 70 and 80 out of 100.

In order to achieve the high targets of modal shift then, the key corridors should exceed the minimum standards of good design. However, it is clear from the assessments below that the existing walking and cycling infrastructure in Ipswich is massively sub-standard and without major improvements there is absolutely no chance of achieving the modal shift targets required and hence the CS is unsound in respect of Policy CS5 and subsequently CS20 Transport and DM3 Air Quality.

Corridor	WRAT	CLOS
Minimum level required	28	70
London Rd / Hadleigh Rd	27.2	58
Wherstead Rd	24.4	32.6
Henley Rd / Westerfield Rd	24.7	37.2
Birkfield Drive	18.25	41.5
Hawthorn Drive	19.5	30.7
Inner orbital	31	45 estimated from parts that can be scored unable to provide average score as some parts have no cycling or walking provision
Gipping River Path	20.6	44.3
Woodbridge Rd / Spring Rd	28.6	42.3
Nacton Rd / Landseer Rd	27.8	41.4

It should also be noted that the assessments are based on the most suitable route, rather than routes walkers and cyclists might actually use so these scores will be higher than what is will be experienced on average. Clearly cycling and walking in Ipswich is currently an unattractive, unsafe, incoherent, uncomfortable experience that is also non-directional.

The Transport Modelling, which we will discuss later, includes extremely challenging modal shift assumptions. Unless IBC can provide evidence of sufficient funding and plans in place to improve the ineffective cycling network the required levels of modal shift cannot possibly be achieved, and the CS cannot be found to be sound.

We also note that Ipswich Buses, operated by IBC, continues to use the outdated approach of having bus routes that just go into town rather than establishing radial routes such as along the A1214/Heath Rd from ASDA/Whitehouse, past the hospital, to Futura Park/Ransomes/Havens. Bus route 2 currently stops at the hospital and could easily be extended to the ASDA/Whitehouse area. Such an approach would provide a more direct quicker route for many people and have the advantage of avoiding the town centre AQMAs. We would like to see the CS Preferred Options include a requirement on IBC to assess and test the viability of such bus routes to Improve

Accessibility and help contribute to modal shift. Substantial investment in the Ipswich bus network is required, including the expansion of the Ipswich Park and Ride network.

#### **IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS<sup>18</sup>**

This Financial Plan covers up to 2023/24 and was approved at Council on 19/02/2020. Paragraph 32 identifies IBC's top ten projects for this period, which includes "*providing high quality multi-story and surface car parking*". However, there is no money allocated over the four-year period to improving air quality, delivering modal shift or improving cycle and pedestrian infrastructure (i.e. to improve accessibility) despite the CS being dependent on achieving 15% modal shift and IBC being in breach of legally binding air quality limits. There is not even any mention of 'modal shift', 'air quality', 'cycling', 'walking', 'traffic' or 'sustainable travel' in the 98 page document, which would appear to illustrate the lack of commitment of IBC to invest in improving these areas. IBC is clearly prioritising encouraging people to drive into the town centre rather than use more sustainable means. The CS is clearly not effective as IBC has not allocated any funding towards delivering modal shift or improving air quality.

#### **Paragraph 8.97 and Policy C20 e) reference to the [Car] Parking Strategy and Plan**

It is not clear if the Ipswich Parking Strategy as drafted by WYG Transport Planning dated March 2019 has actually been approved by the IBC Executive. The IBC website Decision List shows a decision by the Executive was due on 29<sup>th</sup> October 2019, but the Strategy was not on the agenda. It now seems to have disappeared from the Decision List without a decision being made. IBC needs to detail the current situation with the Parking Strategy.

Paragraph 2.4.6 states that the Strategy is based on 12,500 additional jobs target 2011-2031 on 35 hectares whilst the proposed target is for approximately 9,500 jobs on 23.5 hectares by 2036 – a substantial reduction. Paragraph 2.4.4 states that it is based on 8,840 new dwellings by 2036 – the new target is 8,010. The new targets therefore render the Strategy obsolete. With the reduction in these targets, especially new jobs, it is logical to assume there will be a reduced requirement in land for car parking. We believe this brownfield land would be better used for housing before any development of the Humber Doucy Lane site. The CS is unsound in allocating the Humber Doucy Lane site for housing ahead of excess brownfield car parking sites. As shown in its FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS, IBC is prioritising improving town centre car parking and encouraging car journeys into town ahead of funding the encouragement of more sustainable forms of transport. This is in breach of the proposed CS

At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. The Car Parking Strategy drafted in March 2019 needs to take account of this, especially given the Council operates many car parks in Ipswich, for the CS to be sound. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

#### **Policy CS10 Ipswich Garden Suburb**

<sup>18</sup> <https://democracy.ipswich.gov.uk/documents/s27023/C-19-19%20MTFP%20Appendix%201%20-%20Financial%20Strategies%20and%20Medium%20Term%20Financial%20Plan%202020-21%20Onwards.pdf>

We have major concerns on the ability of the road network to cope with the additional traffic from the IGS without some form of northern relief road.

We are pleased that IBC secured £9.8m from the Housing Infrastructure Fund for the country park and the two road bridges over the railway. We believe this money is required to be committed by March 2022 (following an extension to the original date of March 2021). If this is the case, we are concerned that this critical infrastructure may not be delivered in time to secure the funding as work is yet to start on-site. We are particularly concerned that the relevant Decision Notices granting Outline Planning Permission for the Crest Nicholson IGS development only requires the Vehicular Bridge to be delivered upon the delivery of 699 homes. Clearly it is impossible to build this number of homes before March 2022 although it may be possible to demonstrate "commitment" as required by the HIF. We are already concerned that the existing Henley Road bridge over the railway is not wide enough to allow cyclists, pedestrian and cars to pass safely yet there are no improvements planned for this bridge. Without the early delivery of the road/pedestrian bridge and associated links into town that avoid the Henley Rd rail bridge, there is no safe walking/cycling route from the Crest Henley Gate development into town and the CS would consequently be unsound.

The Section 106 agreements for the two approved IGS sites may well include measures to safeguard HIF funding, or provide for other means of securing the required funding. These are technical and complex documents that are difficult for the public to understand. We believe that IBC needs to provide evidence that this infrastructure will be delivered in time to secure the funding and that contingency measures are in place to secure alternative funding for this infrastructure for the CS to be considered sound. As we discuss later in our submission the delivery of the IGS road infrastructure problems needs to be compatible with the dates assumed in the SSC traffic modelling. Evidence needs to be provided this is the case, before the CS can be found to be sound.

We are pleased to see that S106 payments agreed for the two approved IGS sites include funding for improved off-site infrastructure such as improving the Bridleway, cycle routes and providing crossings on Valley Road and Park Road. However, the trigger points for these payments are split into three instalments, with the last one prior to occupation of 500 homes for the CBRE/Mersea site and 600 homes for the Crest Nicholson site. Unless funding is provided from elsewhere to deliver the offsite infrastructure earlier than these trigger point dates, the required levels of modal shift will not be achieved by 2026 as the required sustainable travel infrastructure around the IGS will be incomplete.

We note that the S106 payments schedule for Henley Gate requires Crest Nicholson to deliver the Smarter Choices Programme for homes between Norwich Road and Henley Road (bounded by Valley Road). However, this is not required to commence until occupation of the 500<sup>th</sup> home. Consequently, there will be no modal shift programme implemented for this area in time to deliver the 15% modal shift requirement that is assumed in the transport modelling by 2026. The CS is therefore unsound in this respect.

WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions January 2020

3.9 IPSWICH RESULTS SUMMARY show that even with the high levels of modal shift and new infrastructure many junctions will become unacceptably congested around the Ipswich Garden Suburb.

3.9.1. Several of the A1214 corridor junctions operate with an overall V/C greater than 85%.

- A1214 / Dale Hill Lane – approaching capacity in AM/PM peaks in 2036. [Although not stated we also note that this junction is approaching capacity in 2026.]

- A1214 / Henley Road –approaching capacity in 2036 AM/PM.
- A1214 / Westerfield Road – approaching capacity in 2036 AM/PM peaks.
- A1214 / Tuddenham Road – approaching capacity in AM peak in 2036.
- A1214 / Rushmere Road – approaching capacity 2036 AM/PM peaks.

However, previous modelling for both Application IP/16/00608/OUT Land North Of Railway And East Of, Henley Road, Crest Nicholson (see Paragraph 5.121) and Application IP/14/00638/OUTFL Land To South Of Railway Line, Westerfield Road, CBRE/Mersea Homes (see Paragraphs 5.69 and Paragraph 8.484) has shown that these junctions are already operating at or near capacity at peak times and will continue to do so. By applying a 15% modal shift reduction, the modelling is hiding the fact that Ipswich roads are already heavily congested with many roads already operating at capacity at peak times.

In addition, Figures 15 and 16 also illustrate the many links that reach capacity, most notably on most of the A1214 from the hospital to Bramford Rd and on surrounding roads around the Ipswich Garden Suburb. Further modelling of these junctions and links at capacity at Peak times and either side of the peaks, is required to assess the impacts throughout the day. If they remain congested for long periods, then clearly the CS cannot be found to be sound for Transport and Air Quality. The modelling work needs to identify when these junctions and links reach capacity and how congestion will be mitigated as evidence for the CS to be sound; there is a big difference with this happening in say 2027 or 2035 between the modelled periods or even before 2026 in some cases.

We are also concerned that the modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads such as Elsmere Road and Dale Hall Lane as well as Park Road, which are not designed for heavy traffic and have not been included in Air Quality Assessments. It is obvious that in 2026 air quality will be worsened on these roads, which is in breach of the CS and therefore unsound. We note that this level of excessive congestion is forecast even if high modal shift rates are achieved etc. We are also concerned that Air Quality limits will worsen between now and 2026 yet there is no assessment of this.

We note that the CBRE/Mersea planning application for the IGS assumed that the “flagship project” Ipswich – Transport Fit for the 21<sup>st</sup> Century (renamed Travel Ipswich) would reduce dependency on car by 15%, whilst the Crest application assumed 20% reduction for work, business and other activities. It is clear the current network is completely UNFIT for the 21<sup>st</sup> Century and without substantial additional investment than that proposed it will remain this way.

Despite the Cross-Boundary Water Cycle Study report<sup>19</sup> there remains a lack of understanding and detail on what new additional sewage infrastructure will be required or evidence that the sewage infrastructure required for the IGS can be delivered despite first requesting this almost 10 years ago. Anglian Water’s proposed strategy to upsize 330 metres length of sewer along Valley Road and provide 550 cubic metres of storage off-line storage under Valley Road solution was briefly mentioned in the outline planning application for the Mersea Homes outline planning application for Land To South Of Railway Line, Westerfield Road IP/14/00638/OUTFL. There is still no agreed solution despite the two IGS outline applications being approved in February 2020. We note that IBC has stipulated that “Prior to the submission of the first Reserved Matters application a Site Wide Foul and Surface Water Drainage Strategy which covers the entire development site.”

If sewage infrastructure cannot be provided at the right time and at the right price for the IGS (as a whole) then the IGS cannot be delivered in accordance with the Plan. The implications of the

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<sup>19</sup> [https://www.ipswich.gov.uk/sites/default/files/cross-boundary-water-cycle-study\\_jan\\_2019.pdf](https://www.ipswich.gov.uk/sites/default/files/cross-boundary-water-cycle-study_jan_2019.pdf)

construction of new sewage infrastructure on Ipswich need to be considered as part of the CS. For instance, providing a 550cubic metres sewage storage tank under Valley Road. will require its closure for many months and have a major detrimental impact on traffic and air quality in Ipswich. Sewage infrastructure requirements urgently need to be considered in Policy CS10 and included in the Infrastructure Table 8b. In our view, all off-line sewage storage should be provided on the IGS site to minimise traffic impacts and prevent the worsening of Air Quality in areas already exceeding legal limits in Ipswich.

The effectiveness of the CS to deliver both employment and homes growth including the IGS could be seriously undermined by the ongoing failure to properly assess the cumulative requirement of Ipswich for wastewater infrastructure over the CS period and plan for its provision. This remains a major failing of the CS making it unsound. We note that improvements to sewage infrastructure has been included in ISPA2 and it also needs to be included in relation to the IGS.

The potential impact of Sizewell C on the IGS and the CS has not been assessed in any form of sensitivity analysis. We have previously raised concerns of the impacts of increased rail freight for Sizewell C on the Ipswich – Westerfield stretch of the rail-line regarding air pollution, noise, operation of Westerfield level crossing and the proposed pedestrian bridge, which have been ignored. In its response to the latest consultation on Sizewell C<sup>20</sup>, we are pleased to see that IBC now shares these concerns, but still fails to assess the potential impacts in relation to the IGS and the CS. The potential impacts of Sizewell C as raised by IBC in its consultation response needs to be assessed in relation to the soundness of the CS preferred options through sensitivity analysis prior to a decision being made on whether it proceeds.

We believe the Council's estimate requirement for increased retail space in Ipswich town centre remains flawed and question the need to allocate part of the Westgate site and the Mint Quarter for retail. We have always argued that Ipswich Borough Council has been over-estimating retail demand (as with previous undeliverable homes and employment targets). We believe that less retail space will be required in future and that some of it should be reallocated for housing in preference to of green space at the northern end of Humber Doucy Lane and Tuddenham Road. As mentioned above we believe there will be less land required for car parking in and around the town centre and that this land should also be reallocated for housing ahead of the Humber Doucy Lane green space for the CS to be sound.

### **Policy CS16 Green Infrastructure, Sport and Recreation**

The proposed allocation of land for housing at the northern end of Humber Doucy Lane and Tuddenham Road is in breach of Policy CS16, e.g. in relation to the protection and enhancement of green corridors. The CS is therefore unsound.

### **POLICY CS17: Delivering Infrastructure**

We remain concerned that the proposed development of the Ipswich Garden Suburb without improved road infrastructure will severely impact on traffic congestion and air quality and adversely affect the quality of life of residents.

At a strategic level, the Water Cycle Study concludes that, based on the predicted housing growth in IBC and SCDC, it is anticipated that no works/ upgrades to the existing water recycling centre (WRC)

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<sup>20</sup><https://democracy.ipswich.gov.uk/documents/s23982/Item%2011%20Appendix%202%20Sizewell%20C%20Stage%203%20consultation%20IBC%20proposed%20response.pdf>

at Cliff Quay, other than those already planned by Anglian Water, are required. In terms of the Ipswich area, Anglian Water have the following three projects committed in their Water Recycling Long-Term Plan (2018)<sup>21</sup>

- Increased Water Recycling Centre Process Capacity - £12.3m cost – Scheduled for completion by 2032;
- Combined Sewage Overflow improvements - £11.96m cost – Scheduled for completion by 2027; and
- Increased Drainage Capacity through surface water management and upsizing (Defined Contingent Scheme) - £15.496m cost – Scheduled for completion by 2027.

This is clearly major infrastructure that is required for the delivery of the CS and should be included in the Infrastructure Table for the CS to be sound.

However, there is still no sewage infrastructure solution for the IGS or for the wider ISPA area despite it being a strategic priority (Policy ISPA2 Strategic Infrastructure Priorities i)). IBC needs to work far more closely with Anglian Water (and ISPA) to undertake a proper assessment of the cumulative homes and jobs expansion needs for strategic wastewater infrastructure in and around Ipswich to identify and cost key infrastructure deliverables. These need to be properly included in both CS Infrastructure Tables 8A and 8B as well. Without proper assessment and clear details of required sewage infrastructure to deliver the CS it is clearly unsound.

Please see our comments under Policy CS4 in relation to RAMSAR sites.

### **POLICY CS20: Key Transport Proposals**

It is worth noting that The Upper Orwell Crossings (the Wet Dock Crossings) will not proceed as there is insufficient funding (although new proposals for pedestrian crossings may be developed). SCC has also confirmed the Ipswich northern relief road will also not proceed. Without these major infrastructure projects, we believe increased congestion is likely to be severe and unacceptable without substantial investment in improving the existing road network, bus routes, rail services, dedicated cycle routes and major funding to support modal shift including funding to change the attitudes and behaviours of existing residents in relation to their transport modes. We believe that evidence needs to be provided to the Planning Inspector that substantial funding is available to deliver these improvements for the CS to be found to be sound.

We note that the traffic modelling does not assess the impacts of the potential construction of Sizewell C. Clearly this will have a major impact on traffic in Suffolk and Ipswich as recognised by IBC in its latest consultation response on Sizewell C proposals. As well as construction traffic itself, IBC agrees there will be an increase in the number of outward commuters from Ipswich/local areas and weekly commuters from further afield. The Transport assessment will need to be revised if Sizewell C proceeds.

We are pleased to see the WSP/ Suffolk County Council ISPA LOCAL PLAN MODELLING Methodology Report and the WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions – (January 2020) which updates previous January 2019 modelling work. However, we have major concerns with some of the key assumptions and outputs.

#### ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2

<sup>21</sup> [https://www.anglianwater.co.uk/\\_assets/media/water-recycling-long-term-plan.pdf](https://www.anglianwater.co.uk/_assets/media/water-recycling-long-term-plan.pdf)

As mentioned above this shows the future highway schemes which have been included in the forecast model networks within Ipswich which are all assumed to be in place by 2026 (we have added relevant references to IGS for clarity).

1. Bixley Road / Heath Road / Foxhall Road Additional lane NB for Bixley Road / Additional lane SB for Heath Road
2. Nacton Road / Maryon Road Turn WB Nacton to two lanes, and EB Nacton to one lane
3. Upper Orwell Street Changed to one-way southbound from St Helen's Street
4. St Helen's Street / Bond Street Bus lane removal [we question how this will improve bus services?]
5. Ipswich Radial Corridor Route improvements - Felixstowe Road. Capacity increase to Felixstowe Road & Bixley Road arms of roundabout with A1156 Bucklesham Road. Capacity increase at Bixley Road / Ashdown Way junction
6. Ipswich Garden Suburb – Henley Gate Two signalised junctions included as part of site access onto Henley Road [required as part of Crest Nicholson planning consent]
7. Ipswich Garden Suburb – Fonnereau Priority controlled junction included on Westerfield Road in relation to access [required as part of CBRE planning consent]
8. Ipswich Garden Suburb – Red Hill Farm Two priority-controlled junctions included on Westerfield Road, north and south of Fonnereau access junction [should be required as part of Red Hill planning consent when determined]
9. A1214 Valley Road / Westerfield Road Increased capacity modelled on A1214 approaches to roundabout due to flares [required before 599 homes occupied on Henley Gate site and 399 homes occupied on CBRE site as stated in the Decision Notices]
10. A1214 Valley Road / Tuddenham Road Increased capacity modelled on A1214 approaches to roundabout due to flares [required before occupation of 499 homes built on CBRE site as stated in the Decision Notice]
11. Europa Way link road Link road between Sproughton Road and Bramford Road, extension of Europa Way with priority-controlled roundabouts
12. A1214 / Bell Lane Ban of right turn from A1214 onto Dr Watson Lane. Signalised junction of A1214 / Bell Lane changed to priority-controlled roundabout

As noted above this list excludes improvements to the Henley Road/Dale Hall Lane junctions with Valley Road which are required by SCC from Crest Nicholson before 299 home are occupied on its IGS site (as stated in the Decision Notice). We note that the IGS Highways projects are not secured through S106 Agreements but will be provided by the Developers.

It is not clear whether these projects will be funded separately by SCC outside of the Transport Mitigation Programme or will be funded as part of the Transport Mitigation programme budget. It is unclear what completion dates for these infrastructure projects has been assumed in the modelling work and whether these assumptions are realistic and consistent with the trigger points placed on the IGS developers. Evidence needs to be provided of how each infrastructure project is intended to be funded and when it needs to be completed (as assumed in the modelling work). Currently there is too much ambiguity around these assumptions. We are especially concerned that A1214 junctions' improvements will not have been delivered by 2026 as assumed in the model. Without evidence that funding is available to deliver these 13 projects at the required time the CS is unsound.

As previously mentioned, these projects need to be included in the Infrastructure Tables. If any of the projects are not delivered by the required dates (which need to be identified in the modelling work so they can be tested to be sound) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needs to be provided to the Planning Inspector that funding is in place for these schemes compatible with the required delivery dates which need to be specified.

We note that rail freight from Felixstowe Docks is planned to increase by 50% and the number of trains by 30% with the upgrade of the rail line to Ipswich. This will result in a major increase in the number of closures of Westerfield level crossing and for a longer duration. Westerfield Road is the main access route to the IGS developments (other than the Henley Gate/Crest Nicholson development). Therefore, IBC needs to provide evidence that the SCC modelling assessment has included the impact of the increased closure frequency of Westerfield Road level crossing on traffic for the CS to be sound.

The following Tables show the trip generation reductions assumed in the modelling work, if these are not achieved the modelling is essentially unsound as will be the CS, as the transport network will not be able to cope with the traffic.

Table 5-1 – Trip generation reductions applied to existing road users

Trip type	0-2.5km	2.5km-8.5km	8.5km+
Urban-urban	30.00%	15.00%	5.00%
Urban-rural / rural-urban	5.00%	5.00%	5.00%
Rural-rural	0.00%	0.00%	0.00%

Table 5-2 - Trip generation reductions applied to development trip generations

Land Use Type	Development Type	Small	Medium	Large
Residential	Town Centre	10.00%	12.50%	0.00% <sup>22</sup>
Residential	Urban	5.00%	10.00%	10.00%
Residential	Rural	2.00%	2.00%	2.00%
Employment	Town Centre	15.00%	20.00%	20.00%
Employment	Urban	10.00%	15.00%	15.00%
Employment	Rural	3.00%	3.00%	3.00%

We note that “*For any development from which trip rates and trip generation was determined from an existing Transport Assessment (i.e. greater than 500 dwellings / jobs), no trip generation reduction was applied as it was assumed a shift to sustainable travel was already accounted for within the Transport Assessment*”. We agree with this approach to prevent double counting.

We note that the assumed modal shift rates for the Crest Nicholson and CBRE/Mersea developments in their approved planning applications were 20% (from work, business and other activities, and 30% for travel to the secondary school) and 15% respectively.

Table 6-4 – 2026 Reduction in existing car trips

Sector	ID	AM 2026		PM 2026	
		Origin	Dest	Origin	Dest
	All	-9%	-9%	-10%	-10%
Ipswich Central	800	-12%	-15%	-15%	-15%
Ipswich NW	801	-13%	-13%	-13%	-14%
Ipswich NE	802	-17%	-17%	-17%	-17%
Ipswich SE	803	-15%	-15%	-15%	-16%
Ipswich SW	804	-17%	-14%	-15%	-14%

We note that the reduction in 2036 is very similar.

Tables 6-6 to 6-9 show reduction in trips from new road users for 2way trips in Ipswich these are

<sup>22</sup> 0% as there are no such developments

- 12% AM 2026
- 13% PM 2026
- 11% AN 2036
- 12% PM 2036

In Section 6.4 TOTAL TRIP MATRIX REDUCTION Tables 6-10 to 6-17 provides a comparison by vehicle type for the increase in overall county wide traffic for the various 2026/2036 AM/PM assignments with and without demand adjustment compared to the 2016 base. This information needs to be presented for Ipswich in order to properly assess the impacts of the CS and the feasibility of modal shift by vehicle type for Ipswich.

#### WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions January 2020

The Demand Reduction Impact for Ipswich is reported in Tables 7 - 14 as follows:

- 28% Reduction in PCU. Hours Delay (AM 2026) – SCC Highway
- 29% Reduction in PCU. Hours Delay (AM 2026) - SCC Highway / SRN interface
- 26% Reduction in PCU. Hours Delay (PM 2026) – SCC Highway
- 23% Reduction in PCU. Hours Delay (PM 2026) - SCC Highway / SRN interface
- 28% Reduction in PCU. Hours Delay (AM 2036) – SCC Highway
- 7% Reduction in PCU. Hours Delay (AM 2036) - SCC Highway / SRN interface
- 30% Reduction in PCU. Hours Delay (PM 2036) – SCC Highway
- 22% Reduction in PCU. Hours Delay (PM 2036) - SCC Highway / SRN interface

These are clearly substantial reductions but there has been no scenario analysis or assessment of how realistic these assumptions and demand reduction impacts are. We believe this level of reduction will be extremely difficult to achieve and that evidence is required to verify this for the CS to be sound.

The AM Peak is defined as 08.00-09.00 and the PM Peak as 17.00-18.00 but road users already experience congestion either side of these times and also around 15.00-16.00 in certain parts of Ipswich due to school traffic/use of pedestrian crossings etc. Experience shows that there are signs of the evening peak running from 15.00-18.30 at certain junctions and road links, e.g. the A1214, to varying degrees. It is not clear how the transport modelling considers the implication of this and the impact of congestion outside of the peak times, this needs to be explored further for the CS to be found sound with regard to Transport. It is particularly important with regard to the potential for road users to alter their journey patterns outside of the model's peak times.

Tables 15, 17, 19 and 21 for SCC Highway in Ipswich including the demand adjustments show  
 5 Junctions with overall V/C ratio of 85%+ (AM Peak) in 2026  
 12 Over-capacity links with V/C ratio of 100%+ (AM Peak) in 2026  
 11 Junctions with overall V/C ratio of 85%+ (AM Peak) in 2036  
 42 Over-capacity links with V/C ratio of 100%+ (AM Peak) in 2036  
 2 Junctions with overall V/C ratio of 85%+ (PM Peak) in 2026  
 9 Over-capacity links with V/C ratio of 100%+ (PM Peak) in 2026  
 12 Junctions with overall V/C ratio of 85%+ (PM Peak) in 2036  
 44 Over-capacity links with V/C ratio of 100%+ (PM Peak) in 2036

Previous modelling (for the IGS planning applications) has shown that many junctions and links in Ipswich are already operating at/near capacity at peak times and will continue to get worse without the 15% assumed modal shift. Clearly it will be impossible to achieve 15% modal shift in Ipswich by

2023 (for example) especially as there are no current modal shift projects running in Ipswich. Modelling work needs to show how congested Ipswich roads will be with the additional growth before 2026 with realistic, evidence-based levels of achievable modal shift. By applying a 15% modal shift reduction for the only years modelled, the modelling is hiding the fact that Ipswich roads are already heavily congested with many roads at capacity. There is no evidence that the CS is sound in relation to transport proposals in the years up to 2026.

We note that the Results Summaries are only provided with the full demand adjustments without a comparison with zero adjustment (or any levels in between). The impact of additional traffic either side of the AM and PM peaks also needs to be assessed for the CS to be found to be sound.

Section 3.9 IPSWICH RESULTS SUMMARY show that even with the high levels of modal shift and new infrastructure many junctions will be unacceptably congested. What the modelling does not show is that these junctions are ALREADY at or near capacity.

3.9.1. Several of the A1214 corridor junctions operate with an overall V/C greater than 85%.

- A1214 / Dale Hill Lane – approaching capacity in AM/PM peaks in 2036. [Although not stated we also note that the modelling shows this junction is approaching capacity in 2026.]
- A1214 / Henley Road –approaching capacity in 2036 AM/PM.
- A1214 / Westerfield Road – approaching capacity in 2036 AM/PM peaks.
- A1214 / Tuddenham Road – approaching capacity in AM peak in 2036.
- A1214 / Rushmere Road – approaching capacity 2036 AM/PM peaks.

3.9.2. V/C results show congestion in the AM and PM peak on Key Street/College St and St Helens Street / Old Foundry Road / Crown Street corridors in Ipswich town centre.

Figures 15 and 16 also illustrate the many links that reach capacity, most notably on most of the A1214 from the hospital to Bramford Rd and on surrounding roads most notably around the Ipswich Garden Suburb. Further modelling of these junctions and links at capacity at Peak times is required to assess the impacts throughout the day. If they remain congested for long periods, then clearly the CS cannot be found to be sound with regard to Transport and Air Quality.

We repeat our concerns that the modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads such as Elsmere Rd and Dale Hall Lane as well as Park Rd, which are not designed for heavy traffic and have not been included in Air Quality Assessments. It is obvious that in 2026 air quality will be worsened on these roads, which is in breach of the CS and therefore unsound. We note that this level of excessive congestion is forecast even if high modal; shift rates are achieved etc.

The level of detail of the results provided in this report and published on the IBC website is far less than in the previous 2019 report and as Appendices A-C have not been included in the Evidence Base. These Appendices should be made available publicly prior to the Inspectors examination for analysis and to inform the proceedings.

4.4 IPSWICH MODELLING RESULTS states “*4.4.1. Ipswich is highlighted as the location which benefits the most from the ISPA demand adjustments which have been applied. Ipswich experiences the highest proportional decrease in PCU Delay hours and reduction of junctions which show overall V/C issues. 4.4.2. Despite the significant benefits of the demand reductions, there are still various junction approaches along the A1214 corridor around Ipswich are shown to be over or close to capacity in both 2026 and 2036. Junctions in and around the Star Lane gyratory are shown to have capacity issues in both forecast years. Other junctions which show overall capacity issues include Nacton Road / Landseer Road and the St Augustine roundabout (Bucklesham Road / Felixstowe Road).*” IBC has not provided any evidence how these issues will be resolved and without doing so the CS is not

sound.

The Traffic modelling clearly needs to show in which year these junctions/routes reach these levels of congestion in order to plan properly for the delivery of the CS. From the results it is clear major new traffic infrastructure is required to resolve congestion on these routes and/or junctions in addition to those 12 projects already identified by SCC and assumed to be implemented.

We note that 4.7 SUMMARY 4.7.1. states "*The modelling detailed within this report is considered to be a robust basis which enables each of the LPAs to be able to test the transport impacts of the proposed housing and job growth within their respective emerging Local Plans.*" We agree that the modelling does test the impacts but do not believe that the modelling work is sufficiently robust to demonstrate that the CS is sound. We note that SCC does not go as far as saying that the CS policies in relation to accessibility and Transport are sound. In our view they are not sound, and IBC needs to provide further robust evidence that they are.

We also note that the traffic modelling excludes any construction and trades traffic involved with any of the new developments and consequently is not sound. Given the scale of development planned in and around Ipswich over the lifetime of the Plan, volumes of construction-related traffic are likely to have a material effect. This is particularly relevant to the roads around the IGS where the bulk of construction-related traffic will result given the proposed 3,500 homes and associated developments. The traffic modelling needs to include all traffic associated with the construction of the proposed new developments in the modelling work to be sound. In Ipswich, the traffic modelling also needs to include the impacts of any major sewage infrastructure works required for the new development, for instance Anglian Water's proposed strategy is to upsize 330 metres length of sewer along Valley Road and provide 550 cubic metres of storage off-line storage under Valley Rd, which will require its closure for many months.

If this required traffic infrastructure cannot be delivered in a timely and effective manner before proposed development, then such development cannot be allowed to proceed as it would lead to severe congestion. A mechanism needs to be included in the CS to ensure that this cannot be allowed to happen for it to be sound.

POLICY CS20: KEY TRANSPORT PROPOSALS states that "*The menu of potential measures is set out in the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area (ISPA). A detailed action plan will be identified through the ISPA Board. Transport mitigation measures will be funded through developer contributions, Local Transport Plan funding, New Anglia Local Enterprise Partnership funding, the Highways England capital funding programme and bidding for other relevant funds.*" This is somewhat misleading as the Mitigation Strategy includes an Implementation Programme (admittedly one that lacks detail and proper cost assessment) which requires substantial funding, including from ISPA authorities, to deliver the required levels of modal shift to deliver Policy CS20 Transport.

Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area, August 2019

We are disappointed that the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area, August 2019<sup>23</sup>, clearly a key document, has not been included from the IBC

<sup>23</sup> <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/ISPA-Transport-Mitigation-v13F.pdf>

New Evidence database. As we have only recently come across the document, we have not had sufficient opportunity to examine it in detail prior to the consultation deadline. We believe it is a key document for the Planning Inspector to consider in relation to the soundness of the Transport (and air quality) related aspects of the CS and should be assessed accordingly.

This includes an Implementation Programme for Phase 1 to 2026 with measures up to 2036 to be confirmed. SCC states "*It is anticipated that the phase 2 costs are likely to be greater than phase 1 as these will include linked roads and junctions within the town's network*".

Paragraphs 12.18.1 & 2. state that "*The focus of the implementation programme is to deliver mitigation within Ipswich to address the impact of cumulative growth identified in the ISPA planning authorities' local plans. Recognising that this work will support the Local Transport Plan strategy for Ipswich.*" and "*Modal shift has been identified as the mechanism to mitigate the impacts of this growth. Trip rate adjustments were made within the SCTM model assessment to reflect a reasonable level of modal shift. This approach to trip reduction results, broadly, in a 9% shift to the background traffic and a 7% reduction to the new trips. The implementation programme focuses on measures that will deliver this level of modal shift*".

However, the modelling work assumes reductions in Ipswich of

- around 15% (Table 6-4) in 2026 in existing car trips (with similar levels in 2036), and
- -12% AM 2026, -13% PM 2026, -11% AM 2036, -12% PM 2036 reduction in trips from new road users for 2way trips in Ipswich (Tables 6-6 to 6-9)

This level of modal shift seems to apply to ISPA as a whole whereas a far greater reduction is required for Ipswich. It is not clear that the full costs of this have been factored in. We question whether the proposed Implementation programme is sufficient to deliver the level of modal shift required in Ipswich assumed in the modelling work to deliver the CS and whether the CS is sound with regards to Transport (and hence air quality).

The evidence provided in Chapter 5 of the achievable levels of modal shift show that the required levels of modal shift for Ipswich are massively higher than the evidence base suggests is achievable or has ever been realised in the UK before. We note that the 2010 Sustrans Smarter Choices Project for Ipswich *engaged with 12,000 households in a two-year period at a cost of £474,098. Overall it achieved a 11% car with single driver trip modal shift, but this was not sustained due to the lack of long-term engagement* (Paragraph 5.2.13). It is important to understand that these levels of modal shift were achieved in summer months and there was no assessment of the levels in winter, when the number of cyclists reduces due to dark mornings/evenings and inclement weather. As 12,000 households is a sizeable proportion of total Ipswich households, this will make the modal shift targets even harder to achieve as many households will already have been targeted to change their mode of travel.

There are several reasons why these higher levels of modal shift are unlikely to be achieved in Ipswich – some of which are not specific to Ipswich. For example, the assumptions fail to consider that certain categories of workers cannot work from home and will need to use vehicles to in order to work most notably Tradespeople who use tools and carry equipment such as builders/constructors, gas & water engineers, painters, electricians, kitchen & bathroom fitters, tilers, roofers, gardeners, cleaners. The majority of these invariably travel at peak times. Another example is the growing numbers of care workers who support people to live in their homes. Unless SCC changes its school's policy in relation to choice, many parents will continue to use a vehicle to take and pick up their children from school, especially if parents also work.

Modal shift assumptions also fail to recognise the physical barriers within the town to cycling that have been identified by SCC in its draft LCWIP namely the hills, rail lines and river. Beyond the central core, routes travel uphill to the suburbs. The rail lines restrict route options to the south west of the town and it also severs routes to the north and east. In addition, the river limits north east - south west movements. In particular, many people will struggle to cycle up the steep hills out of Ipswich town. IBC needs to provide the Planning Inspector with sufficient evidence that these barriers can be overcome for the CS to be sound.

It is well known that the number of cyclists reduces in winter due to dark mornings/evenings and inclement weather, yet the modelling assumes the same levels of modal shift will apply throughout the year, which is clearly not going to happen. The modelling and modal shift assumptions are therefore unsound in this respect. IBC needs to provide evidence that extremely high levels of modal shift that have been modelled can be delivered in Ipswich by 2026 for the CS to be sound in respect of Transport and Air Quality.

Paragraph 5.4.5 states that “*Analysis has been undertaken to inform the Suffolk County Council’s Local Cycling and Walking Infrastructure Plan (LCWIP) using DfT approved tools the Walking Route Audit Tool (WRAT) and the Cycling Level of Service (CLoS). This has identified some key links for improvement.*” We are disappointed that this document has also not been added by IBC to its Evidence Base. Please refer to our earlier comments on this.

In order to increase the number of cyclists, people have to feel confident enough and safe to cycle. Yet there is no mention of developing and delivering free road-cycling courses based on national standards<sup>24</sup>. Without these it will be impossible to increase the number of cyclists to required levels even if there were substantial improvements in safer, dedicated cycling infrastructure.

Paragraph 5.5.1 states that “*Work on the walking and cycling strategy is ongoing. To date schemes have been identified to address existing gaps in the network. However, as part of the ISPA mitigation strategy implementation programme a review of the potential to introduce more ambitious measures would be undertaken, with focus on improving sustainable access to areas of employment.*” There does not appear to be much commitment to providing funding to delivering improved cycling infrastructure. Evidence is required that funding will be available for improved cycling infrastructure, training etc otherwise modal shift targets will not be achieved and the CS is therefore unsound.

In the Infrastructure chapter, Paragraph 9.24.1. states “*The provision of infrastructure needs to be considered for all workstreams in the transport mitigation implementation programme. It is intended that most improvements will manage capacity rather than significantly increase capacity due to physical constraints on the Ipswich highway network.*” This statement gives no confidence that there will be much investment in improving cycling infrastructure to increase capacity. As mentioned earlier it is not clear what infrastructure the Transport Mitigation Strategy. This needs to be made clear to the Planning Inspector for the CS to be sound.

The estimated cost of delivery of mitigation of the lower level of modal shift for ISPA as a whole to 2026, phase 1, is summarised in Table 24, copied below. It is worth noting that modal shift does not happen overnight, as it requires a major change in behaviour, but over a period of many years – this does not seem to have been factored in. To have even the remotest of chances of achieving the extremely high modal shift levels required then investment needs to be made now, especially in

<sup>24</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/769891/national-standard-cycling.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/769891/national-standard-cycling.pdf)

infrastructure projects which obviously include planning and build times on top of the length of time to deliver behavioural change. The long lead times of infrastructure based behavioural change projects appears not to have been factored in.

Table 24 – Phase 1 cost estimate

Workstream Range of costs to 2026

Monitoring	500,000	700,000
Smarter Choices & QBP project team	2,300,000	2,500,000
Incentives, including bus route subsidy	4,440,000	5,000,000
Parking review	100,000	200,000
Infrastructure	16,000,000	20,000,000
Technology	incl	tbc
Total	23,340,000	28,400,000

We note that Technology costs remain to be confirmed. SCC state “*The use of technology will be considered for all mitigation measures and improvements, especially where it will provide a cost-effective mechanism to deliver the implementation programme and improve modal shift.*” It is clear that Technology costs are likely to be significant. These urgently need to be costed with funding agreed by the relevant authorities for the CS to be found to be sound.

The apportionment of costs by Local Planning Authority is defined in Table 22 below:

Table 22: Trips In/Out of Ipswich

LPA	% trips
Ipswich Borough Council	45
Suffolk Coastal District Council	28
Babergh District Council	14
Mid Suffolk District Council	13

Chapter 11 Funding sources does not inspire confidence that sufficient funding is available, and that Authorities have committed to providing their share. We note that IBC’s FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS allocates no money at all for modal shift measures. Evidence needs to be provided that sufficient funding is guaranteed, and that each Authority has committed to providing its share of the required funding to deliver the proposed 9% shift to the background traffic and 7% reduction to the new trips. Although this is still far lower than the approximate 15% and 12% reductions the modelling work assumes will happen in Ipswich.

For the CS to be sound an Implementation Programme needs to be included in the CS costed and agreed to be funded by all Authorities that delivers the higher levels of modal shift required to be achieved in Ipswich by 2026. Assurances for funding of the required Phase 2 measures from authorities should also be required for the CS to be sound.

As we have previously stated, there is a single assumption that these levels of modal shift will be delivered, without any scenario modelling e.g. at 25%, 50% and 75% success rates. How will IBC deliver the CS if these unprecedented levels of modal shift are not achieved? Currently Ipswich Borough Council has not provided sufficient evidence that the required levels of modal shift required in Ipswich are achievable or that it has the funding in place to deliver them for the CS to be found to be sound.

### cycling in England in July 2019<sup>25</sup>.

Section 32 recommends that “any revised Cycling and Walking Investment Strategy include targets for getting people to switch from driving to active travel. These targets should be based on the number of journeys made by car, foot or bicycle for journeys of less than 1, 2, 5 and 10 miles.” The Government should set modal shift targets for 2025 and 2040, to align with the targets it sets for increasing levels of walking and cycling. These should be at a level that ensures England meets—at the very least—the Committee on Climate Change’s assumption that there will be a 10% transport modal shift by 2050. Local authorities should be encouraged to set local targets for modal shift as part of their Local Cycling and Walking Infrastructure Plans”. Clearly IBC needs to include modal shift targets in the CS for it to be sound. Whilst we believe that modal switch will be easier in a town than across the UK, it is unbelievable to expect that 15% modal shift can be achieved in 2026. If the Committee on Climate Change is assuming that 10% modal shift targets (over 30 years) are appropriate for the UK in 2050, IBC needs to provide the evidence that it can achieve over 50% higher modal shift in just 6 years (80% lower time frame)? Where is the evidence that IBC can deliver these far higher levels of modal shift in a substantially shorter time frame for the CS to be sound?

### Suffolk's Local Transport Plan 2011 - 2031

We also note that SCC's Suffolk's Local Transport Plan 2011 - 2031<sup>26</sup> seems to be the most recent version available. This is split into two parts and outlines SCC's objectives for transport:

- Suffolk's Local Transport Plan - Part 1 (PDF, 1MB) is a 20-year strategy that highlights the council's long-term ambitions for the transport network.
- Suffolk's Local Transport Plan - Part 2 (PDF, 5MB) is a four-year implementation plan indicating how the council are proposing to address the issues identified within the longer-term transport strategy.

There is no updated version of this in the IBC Local Plan Evidence Base or on the SCC website. A publicly available current Implementation Plan showing how SCC will provide funding to address the key transport issues and the levels of modal shift required to deliver Ipswich Borough Council's CS does not appear to exist. Without this Ipswich Borough Council is unable to provide sufficient evidence that it can deliver Policy CS20 and therefore the CS is unsound.

As previously stated we are not aware of any major improvements to existing cycle routes on the existing road network in Ipswich since that approval of the current CS. IBC needs to provide evidence of what improvements have been made and are planned for existing road network in order to deliver the high rates of modal shift (and lower trip rates) that the traffic modelling uses. Without the provision of supporting evidence lower modal shift rates and higher trip rates should be adopted in the modelling work.

<sup>25</sup> <https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/1487/1487.pdf>

<sup>26</sup> <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>

## **Paragraph 8.220**

There is clear evidence that poor air quality does detriment on health. This needs to be amended to read “Air Quality Management Areas are designated in areas where poor air quality will have an effect on people’s health”. Failure to recognise this undermines the soundness of the Plan.

## **Policy DM1 Sustainable Construction**

At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. Policy DM1 needs to be updated to include this commitment and then strengthened to ensure that the CS delivers carbon neutrality of the Council by 2030 for it to be sound. New build homes built by the Council will have to be zero carbon for this to happen and the Council should require other developers to do likewise. This would be consistent with the Court of Appeal’s ruling on 27/02/20 that the government’s Heathrow’s expansion decision was unlawful because it did not take climate commitments into account.

## **Policy DM2 Decentralised Renewable or Low Carbon Energy**

This policy also needs to be updated and strengthened to incorporate the declaration of a Climate Emergency. The energy requirements of new build homes built by the Council will have to be zero carbon for the Council to become carbon neutral by 2030. The Council should require other developers to do likewise.

## **Policy DM3 Air Quality**

We support the strengthening of DM3 from the previous draft version of the Plan, which was hopelessly weak and ineffective. However there remain major flaws in IBC’s approach to improving air quality which mean the CS is unsound.

The Core Strategy Adopted December 2011 Paragraph 9.95 states “*With the levels of growth proposed for the town coupled with the fact the town already has three Air Quality Management Areas it is felt essential that air quality impacts and mitigations are fully addressed.*” Paragraph 8.201 of the current CS states “*There are, in addition, four Air Quality Management Areas (AQMAs) within the central area of Ipswich, as a result of pollutants from road traffic.*” There are now five AQMAs in Ipswich. This increase from three to five AQMAs is simply not acceptable given the strong clear evidence of the detrimental impacts on human health. Clearly IBC is not doing enough to improve air quality and must do more for the CS to be sound.

NPPF 181 suggests planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. The CS needs to make a clear commitment to improving air quality in Ipswich and compliance with legally binding air pollution targets for the CS to be sound.

In relation to DM3 Topic Paper: Air Quality, Transport and Green Infrastructure Paragraph 20 states that “*the Council has given consideration to the Government’s Clean Air Strategy 2019 and exercised its duty under the Environment Act 1995, and DEFRA’s Local Air Quality Management Policy Guidance LAQM.PG16, (4) with the preparation of a draft Air Quality Action Plan (AQAP) and this too has been through a phase of public consultation leading to its (likely) adoption in 2019*”. We note

that this has now been adopted without taking any notice of most of the criticisms made by consultees. Paragraph 51 states "*The Local Plan Review Preferred Options sit alongside the Council's draft Air Quality Action Plan which looks beyond planning at other measures including corporate measures that can be put in place to improve air quality. The Council's AQ action Plan will be scrutinised by DEFRA, having been subject to public consultation in late 2018.*" IBC needs to confirm that this has happened and provide the results of the examination to help demonstrate the CS is sound.

Defra's template guidelines for the Air Quality Action Plan require firm, time bounded actions that **will deliver** a reduction in air pollution in the five AQMAs. However, IBC fails to follow Government's guidelines and chooses to water down Government requirements. Ipswich Borough Council fails to make the required firm commitment in its AQAP to delivering any reduction in air pollution nor does it set out when it will deliver actual improvements in air quality or specifically how it will do this. In our opinion the AQAP is therefore non-compliant with Government requirements and shows a lack of commitment from IBC to improving air quality in Ipswich in breach of its legal duty to do so. This is clearly to the detriment of residents who consequently suffer from higher incidents of poor health and respiratory disease especially in and around the AQMAs. The HRA fails to take into account the non-compliance of the AQAP with Government guidelines.

The WSP Source Apportionment Study (dated June 2018) supported IBC's AQAP. However, this study is flawed and under-estimates NOx emission levels.

1. The Source Apportionment Study was undertaken for AQMA No.2 (the junction of Crown Street with Fonnereau Road, St. Margaret's Street and St. Margaret's Plain) and AQMA No.5 (Matthews Street/Norwich Road between the Civic Drive roundabout and Bramford Road).
2. ANPR cameras were deployed at two roadside count points located on the A1156 in Ipswich to gather detailed information on the local vehicle fleet. Measurements were conducted over a twelve-hour period each day starting at 07:00 on 27th (Friday), 28th (Saturday) and 30th (Monday) April 2018. One of the two ANPRs (in AQMA2) failed at 14.00 Monday (missing the Monday evening peak).
3. Speeds were only measured for the Friday and Saturday and used in the calculation of the vehicle NOx emission rates for these two days. The averages of the hourly measurements made on both days were used to calculate the vehicle NOx emission rates for the 30th April. The report states that traffic speeds were higher on Saturday (somewhat obviously). Other UK traffic flow studies show that Friday traffic volumes in general tend to be lower than other weekdays (as more people like to work from home on a Friday and some sectors tail off ahead of the weekend). Friday evening peak traffic is also lower than other weekdays as people leave work earlier and there are less after-school activities and hence fewer associated traffic movements. We are dismayed that there was no speed measurement between Monday and Thursday, which would have given a more accurate representation of pollution levels. It is also worth noting that more vulnerable schoolchildren are mainly impacted on weekdays for obvious reasons.
4. The report states the obvious in that "Analysis of the NOx emissions shows that they were inversely proportional to vehicle speed, as shown in Figure 7. This means that lower vehicle speeds will give rise to higher emissions, for example during congested periods at peak rush hour time, in addition to the increase in emissions associated with increases in vehicle number." So, the report underestimates Monday's emissions (and hence Tues, Weds, Thurs) and thereby under-estimates what additional measures will be required.
5. At the end of the 2-day measuring period of the two pneumatic strips measuring speeds was found to be loose. The report acknowledges that "this may have caused inconsistencies in the traffic flows and/or directional assignment measured during the traffic survey" i.e. the results are unreliable and hence the report is further flawed.

We note that Paragraph 47 of the Topic Paper states that “Air Quality modelling was completed in 2016 in relation to locations identified for future development under the Ipswich Core Strategy and Policies Development Plan Document Review, and Ipswich Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document (the Ipswich CS, 2017)”. We believe that this work assumed the Upper Orwell Crossing project would proceed and as this has been cancelled is therefore obsolete. It excluded all emissions arising from construction including construction traffic and tradespeople journeys. It also failed to assess the multi-site build out of the IGS and air pollution levels in the early years of the IGS build. New Air Quality modelling work needs to address these issues and focus on air quality levels in the first 10 years of development, when they are likely to be at their highest levels (before European vehicle emission standards deliver expected emission reductions).

We note that there is no Air Quality assessment provided as part of this consultation, which is unacceptable (although they are planned). We reserve the right to comment on this when it is available and request that IBC notify and consult with us when this work has been released. Whilst we agree with the areas to be assessed identified in the WSP Screening Report January 2020, we disagree with just the two reference years of 2026 and 2036 being used and argue that an earlier year, such as 2023 (being the midpoint between 2020 and 2026. The reason is that by 2026 tighter vehicle emission standards should be delivering improvements and that it is the early years of the CS period when emissions could be at their most dangerous and greater action required to prevent premature deaths. It is completely pointless using 2036 when considering the 2035 (at the latest) ban on petrol, diesel and hybrid vehicles, which will obviously have a major impact many years before this date. We note that the screening assessment uses the SCTM traffic forecasts, which exclude any form of construction traffic. The air quality assessment needs to include emissions from construction traffic and construction otherwise the assessment and hence the CS will be unsound. We note that the SCTM assumes high levels of modal shift without sufficient evidence that this is achievable. Sensitivity testing of different rates of modal shift is therefore required in the assessment for it to be considered sound.

We support the revised draft Policy DM3 of the CS, which states that “Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.” This has not been done for the IGS development (see below) and needs to be undertaken as a priority before building works be allowed to commence. We also note Paragraph 9.3.5 states that “The AQA should also consider wider cumulative impacts on air quality arising from a number of smaller developments”. In our view that the multi-site build out of the IGS needs to be assessed in a new AQA. The HRA fails to assess the non-compliance of the AQA for the IGS with DM3 and needs to assess this accordingly.

Paragraph 1.2 IBC’s AQAP confirms the use of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments (Appendix 2). However, the IBC Planning Department is currently not implementing the Guidance in the way it needs to be in order to improve Air Quality in Ipswich. This is especially pertinent considering the proposed expansion of Ipswich detailed in the CS. This urgently needs to be corrected for the revised CS to be sound. When assessing the Planning Applications in relation to Land To South Of Railway Line, Westerfield Road IP/14/00638/OUTFL and Land to the North of the Railway Line and East of Henley Road 16/00608/OUT the Air Quality guidance was ignored in relation to Sections 6.22 and 6.23 (see Appendix 2). No Air Quality Assessment was undertaken for either application that assessed the impact of construction and construction traffic on Air Quality nor was there an Air Quality assessment carried out for the first year of occupation of any of the phased developments,

when there will also be considerable construction traffic as well as substantial additional traffic from the new homes. This raises four key questions that need to be answered by IBC when assessing the soundness of the CS Preferred Options.

- Question 1 Why has the Council chosen to ignore the Guidelines it has adopted and decided not to assess the impact of emissions from construction and associated construction traffic on Air Quality for these IGS sites?
- Question 2 Why has the Council chosen to ignore the adopted Guidelines and chosen not to assess air quality emission for the first year of each phase (when there will also be emissions from the construction of other phases that are being built in parallel)?
- Question 3 How can the Council assess whether these developments “will compromise or render inoperative the measures within an Air Quality Action Plan, where the development affects an AQMA” as required by Section 6.22 of the guidelines?
- Question 4 How can IBC demonstrate compliance with Policy DM3 in the early years of the IGS development, when considering construction traffic and sewage infrastructure works?

In our view the IGS is non-compliant with Policy DM3.

This is particularly pertinent as much of the construction traffic will pass through AQMA 1 and 4 with tradespeople also travelling through AQMAs 2 and 5 as well. Consequently, IBC is currently failing to properly assess the impacts of the construction and related traffic from the IGS development in the early years of the build out on air quality in Ipswich. It has not assessed whether these developments will compromise the current version of the draft Plan, nor the Air Quality Action Plan.

We cannot find any air quality assessment in relation to rail transport or to shipping at the Port of Ipswich, with both forms of transport increasing. This is a major gap in the evidence base that risks rendering the CS unsound especially as ISPA plan to increased capacity on railway lines for freight and passenger traffic (Policy ISPA2 Strategic Infrastructure Priorities f)). AQ assessments are required for:

- The Port of Ipswich (which is included in the Screening assessment study area),
- the Ipswich Chord and Freight yard, where diesels regularly sit idling emitting pollutant clouds,
- additional freight to and from Port of Felixstowe (Felixstowe-Nuneaton upgrade), we note that rail freight is planned to increase by 50% and the number of trains by 30%, and
- additional freight in relation to the construction of Sizewell C.

We are not arguing against growth, but simply advocating the impacts of air quality need to be properly assessed so that mitigation action can be taken where required. Without this the CS is unsound.

The HRA also fails to consider train and shipping emissions, which need to be included in the HRA especially as shipping will clearly impact on the Orwell Estuary, which is part of a Special Protection Area (SPA) and Ramsar site. We note that the DfT Port Air Quality Strategy (under the Defra Clean Air Strategy , 14 January 2019) applies to ports with cargo greater than 1million tonnes, which would appear to include the Ipswich Strategic Harbour Authority.

We note that the Council failed to apply for any funding under the Clean Air Fund by the November 2018 deadline for projects that are to commence from March 2019. As the Council has no evidence basis or costings for any of its proposed projects in its AQAP, it will not be eligible for future Clean Air Funding. This clearly begs the question how will IBC fund the projects that it has identified in the AQAP as needed to reduce air pollution? We also note that IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS allocates no money at all for improving air quality despite being the responsible authority for doing so. IBC needs to provide evidence that it will be able to finance and deliver its AQAP for the CS to be sound.

## **DM8 Natural Environment**

Please see our comments under Policy CS4.

## **DM20: House in Multiple Occupation**

We support the new Policy 20 as a pragmatic and sensible response to an increasing issue in Ipswich.

## **DM21: Transport and Access in New Developments**

We strongly object to the removal of the reference to traffic capacity and rights of way in

- a. *not result in a severe adverse impact on rights of way or the local road network in respect of traffic capacity and highway safety;*

The references to “rights of way or the local road network in respect of traffic capacity” needs to be reinstated as walking and cycling rights of way should not be reduced and as traffic congestion is already a major problem in Ipswich and should not be negatively impacted on by local new developments. The proposed changes conflict with CS5 Improving Accessibility and renders the CS unsound. We support the change in relation to highway safety.

We support the requirement of

- b. *not result in a significant detrimental impact on air quality or an Air Quality Management Area and address the appropriate mitigation measures as required through policy DM3*

but note that the IGS development is currently non-compliant as it failed to assess the impacts of the development on air quality in accordance with DM3. A revised assessment of air quality impacts of the IGS is urgently required before building can commence and the revised CS can be found to be sound.

It remains unclear how ‘severe’ and ‘significant’ impacts are defined. These need to be clearly defined in the CS. In the case of air quality, there are maximum legal limits for particulates and nitrous oxides, and it would be appropriate for ‘significant’ to be defined as the legal limit.

## **Chapter 10 Implementation**

Tables 8A and 8B needs to include the required specific junction improvement projects, estimated cost and a date by which they are required to be delivered in accordance with the transport modelling assumptions for the CS to be sound.

Table 8A omits the technology costs that will be required to deliver as stated in Table 24 of the SCC Transport Mitigation Strategy. This needs to be included for the CS to be sound as modal shift targets will not be delivered without new technology.

Table 8A needs to clearly identify that substantial funding will be required for sustainable transport measures in Ipswich and infrastructure to support them after 2026 and that the level of funding will be greater than that required up to 2026 as identified in the SCC Mitigation Strategy.

The Link road through site IP029 via Europa Way from Bramford Road to Sproughton Road identified in Table 8A has been included in the SCC Modelling assumptions and therefore must be considered as a requirement. If not, the modelling is unsound and needs to be repeated without this link road. We note that in response to the creation of the Suffolk County Council taskforce to improve Ipswich traffic David Ellesmere is quoted in the East Anglian Daily Times as demanding “a new link road

connecting Europa Way with Bramford Road to alleviate traffic pressures, and work to explore a new road link connecting London Road, Hadleigh Road and Sproughton Road".

### **OBJECTIVE 5: Air quality**

We strongly object to the removal of the current Objective to improve Air Quality which in relation to the five AQMAs is a legally binding requirement. We also note that the Planning Inspector specifically requested the inclusion of this indicator in the last review of the current CS. The existing indicator of the "Number of recorded air quality exceedances." Needs to be retained and reported on. We support the inclusion of an air quality objective but believe this should be to reduce air quality emissions to legally binding limits by a specified date for example within 3 years.

As mentioned previously. It is not clear what the 2004 levels are or how progress against these will be measured; 2004 emissions levels should be included in the CS for completeness so that the target is clear. For example, do 2004 measuring locations correspond with the current measuring locations and if not, how will IBC determine whether levels have returned to 2004? Furthermore, it is not clear when IBC aim to return to 2004 levels. This needs to be done as a matter of urgency and should not be left to 2036 as would be possible under the current Plan, by which time many more Ipswich residents will have died prematurely.

An Objective of "Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels" does not go far enough. Limiting this to an "aim" provides a massive caveat to the Objective. Also, how will the Council determine that EVERY development has contributed?

### **OBJECTIVE 6: Transport and connectivity**

Given the distinct lack of progress in cycling infrastructure an additional indicator is required to measure improvements, especially in relation to the development of new/improved comprehensive, integrated cycle routes.

As identified above, IBC needs to start taking more positive actions to Improve Accessibility as it is currently non-compliant with CS5. Closer scrutiny of IBCs approach to Improving Accessibility is clearly required and additional Objectives/measures are required to monitor and assess progress on Improving Accessibility in the CS to help ensure IBC comply with CS5 in future.

### **IPSWICH LOCAL PLAN REVIEW 2018 - 2036 INTERIM SUSTAINABILITY APPRAISAL REPORT Strategic Environmental Assessment and Sustainability Appraisal October 2019**

A key problem with the Sustainability Appraisal (SA), Habitats Assessment and Health Impact Assessment, are that they simply assume that the CS will be fully implemented and that full funding for all the measures identified in the CS will be secured. In particular, there is no evidence that IBC (in conjunction with SCC) can deliver the substantial improvements in walking, cycling and bus infrastructure, improved road infrastructure and the project required to deliver the unprecedented levels of modal shift required for the CS to be sound. IBC and SCC's track record in these areas is dire with no evidence provided by IBC that this will change. There has been an increase in AQMAs and traffic with little real improvement in cycling or walking infrastructure and a major deterioration in bus services e.g. the closure of the Norwich Rd Park and Ride Scheme and reduction in rural bus services into Ipswich. The failure of Travel Ipswich (Ipswich Fit for the 21<sup>st</sup> Century)to deliver modal shift and the Upper Orwell Crossings project illustrate the problems facing IBC.

In our opinion it is too early to fully comment on the Report for several reasons, including:

- No SA of IBCs non-compliance with Sections 6.22 and 6.23 of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments of the IGS proposed developments regarding construction traffic and assessment of the early years of the development.
- No SA of IBC's non-adherence to Government Guidelines for IBC's own Air Quality Action Plan in relation to the IGS and the Plan. No consideration that the CS does not comply with legally binding air quality targets.
- No SA of the air quality modelling/assessment of road traffic (as this has not been done yet).
- No SA of the omission of emissions from construction and traffic associated with construction of the IGS.
- No SA of the ability to meet the unprecedented levels of modal shift required for the CS to be sound (as identified in the transport modelling and SCC Transport Mitigation Strategy) and no assessment of what happens if the targets are not achieved.
- No SA of the lack of sewage infrastructure plan/proposals for the IGS and ISPA and SA of the environmental impacts of delivering new sewage infrastructure required for Ipswich, including emissions and impact of traffic congestion arising from the required foul water construction works.
- No SA of air quality or noise assessment in relation to rail transport most notably for the Ipswich Chord and Freight yard, where diesels regularly sit idling, emitting pollution and additional freight to and from Port of Felixstowe,
- No SA of the environmental impacts of the Port of Ipswich.
- No assessment of the potential impacts of increased freight traffic on the IGS pedestrian bridge and Westerfield rail crossing (including impacts on traffic delays).
- No SA of the decision to destroy the Green Rim by building homes on the Humber Doucy Lane part and re-designating it as Green Trails.
- The apparent lack of a full appraisal of the impacts on building on land at Humber Doucy Lane in the north east.
- No SA of the alternative of using land reserved for Retail and Car Parking in the town centre, which we believe is surplus to requirements, instead of building on Humber Doucy Lane.
- No SA of the omission of the incorporation of IBC's declaration of Climate Emergency into the Plan.

An updated SA is required to consider all these issues and consulted upon accordingly for the CS to be properly examined and progressed accordingly. Until the SA addresses these issues the CS cannot be deemed sound. We reserve the right to comment on the SA as it is developed.

### **Habitats Regulation Assessment (HRA)**

Please see our opening comments in relation to the Sustainability Appraisal, which apply to the Habitats Regulation Assessment.

The HRA is currently incomplete and needs to address the following impacts of :

1. The proposed re-designation of the Green Rim.
2. The new sewage infrastructure that will be required to deliver the housing and employment targets.
3. The required traffic infrastructure identified by the traffic modelling to improve the road network to allow the sustainable delivery of the CS (summarised above).
4. The non-compliance of the IGS AQA with DM3.
5. Emissions from rail and shipping.

If no such assessments are included in the HRA then the HRA needs to explain why they have been omitted.

IBC's response<sup>27</sup> to the Habitat Regulation Assessment (HRA) recommendations in relation to Paragraph 1.29 is not acceptable. This recommendation states "*In order to make ecological networks and wildlife sites capable of future resilience, there is a need for more wildlife sites, and that existing networks need to be bigger, better and more connected.*" The CS needs to be strengthened to ensure compliance with this recommendation especially as IBC's proposal to re-designate the Green Rim (which has not been assessed by the HRA) is clearly detrimental to this requirement.

It also needs to assess whether the lack of S106 payments for RAMs mitigation from the two IGS sites that received outline planning permission in February 2020 is acceptable as discussed earlier.

### **Health Impact Assessment**

Please see our opening comments in relation to the Sustainability Appraisal, which apply to the Habitats Regulation Assessment. The Health Impact Assessment fails to take into full account the removal of the Ipswich Green Rim, the non-compliance with legally binding air quality targets, emissions from construction, port and rail activities and the failure to include recognition of the Climate Emergency into the Plan.

Brian Samuel

Submitted on behalf of the Northern Fringe Protection Group<sup>28</sup>

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<sup>27</sup>[https://www.ipswich.gov.uk/sites/default/files/response\\_by\\_ibc\\_to\\_the\\_habitat\\_regulation\\_assessment\\_jan\\_2020\\_0.pdf](https://www.ipswich.gov.uk/sites/default/files/response_by_ibc_to_the_habitat_regulation_assessment_jan_2020_0.pdf)

<sup>28</sup>The Northern Fringe Protection Group (NFPG) is making this representation on behalf of its members and other residents who have authorised the NFPG to represent them. A list can be supplied on request.

## **Appendix 1 Evidence that the Green Rim should not be reclassified as Green Trails**

- Ipswich Local Plan November 1997

This makes specific reference to 9 green corridors (A-I) in Chapter 3. Paragraph 3.12 states  
*"These green spaces offer the opportunity to form corridors linking the inner parts of the Town with the surrounding countryside, visually and by providing access on foot or by cycle. These corridors are indicated on Plan No 1."*

NE2 also states that "*The protection of the landscape quality and character of the countryside \*including the Area of Outstanding Natural Beauty (AONB) will be a prime consideration and proposals for irreversible development which is not required for the efficient operation of agriculture, forestry and recreation will not be permitted in the countryside as indicated on the Proposals Map unless there is an overriding case for a rural location.*"

It is clear it is the intention that the green corridors will provide access on foot or by cycle to the surrounding countryside and it is this countryside that was intended to form the green rim of Ipswich.

- Ipswich Core Strategy and Policies Development Plan Document December 2011

Chapter 7: The Key Diagram references (v) The green corridor and green rim approach to strategic green infrastructure (Policy CS16); The green rim almost completely covers the Ipswich Borough Council boundaries, which essentially reflects the countryside in the 1997 Proposals Map.

POLICY CS16: GREEN INFRASTRUCTURE, SPORT AND RECREATION Paragraph 8.175 states "*As the Borough grows, it is essential to protect, enhance and extend the network of open spaces, green corridors, and sports and recreation facilities. This is important in order to: allow people access to green space and nature; strengthen ecological networks that enable wildlife to migrate more easily around the town; link inner and outer parts of the Borough by providing walking and cycling routes;*"

*It will do this by [a number of means including]  
f. working with partners to improve green infrastructure provision and link radial green corridors with a publicly accessible green rim around Ipswich;"*

It is clear the December 2011 Plan continues the concept of the green corridors providing walking and cycling routes to access the green rim and that the green rim was not intended for this purpose. We note that there remain 9 green corridors in the 2011 Plan as there were in the 1997 plan.

The green rim on the 2011 Key Diagram (pg 30) is very much larger than that in the current Key Diagram and clearly illustrates that the concept of the green rim is to protect the countryside on the perimeter of Ipswich Borough. It is also clear the Green Rim has been decimated beyond its original intention.

- Ipswich Core Strategy and Policies Development Plan Document February 2017

Diagram 3 of the Plan (pg 24) and the associated Plan 6

[https://www.ipswich.gov.uk/sites/default/files/plan\\_6\\_green\\_corridors\\_-](https://www.ipswich.gov.uk/sites/default/files/plan_6_green_corridors_-)

[adopted feb 2017.pdf](#) shows that 9 green corridors remain and illustrates the green rim (which has shrunk from the previous Plan).

CS 16 states that “*The Council will safeguard, protect and enhance biodiversity and the environment by working in partnership with others to ensure that our parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefitting the whole community. The Council will enhance and extend the ecological network and green corridors, open spaces, sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk. It will do this by:*

*g. working with partners to improve green infrastructure provision and link radial ecological networks and green corridors with a publicly accessible green rim around Ipswich;”*

This continues the concept that it is the green corridors that provide the links to the green rim.

- Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, Suffolk Coastal District Council and Suffolk County Council  
Statement of Common Ground in relation to Strategic Cross Boundary Planning Matters in the Ipswich Strategic Planning Area Version 3 – December 2018

Section I Annex – Cross Boundary Infrastructure Requirements - Green Infrastructure pg 25 references the Infrastructure requirement for “*Creation of ‘green rim’ around Ipswich*” in accordance with the Update to the Haven Gateway Green Infrastructure Strategy for the Ipswich Policy Area (August 2015), Ipswich Borough Council Local Plan Review Preferred Options (November 2018) policy ISPA4 Cross Boundary Working to Deliver Sites and CS16 green Policies ISPA4 and SCLP12.24 require development to contribute to the creation of the ‘green rim’. This is clearly categorised as “Green Infrastructure” and not as “Transport Infrastructure”.

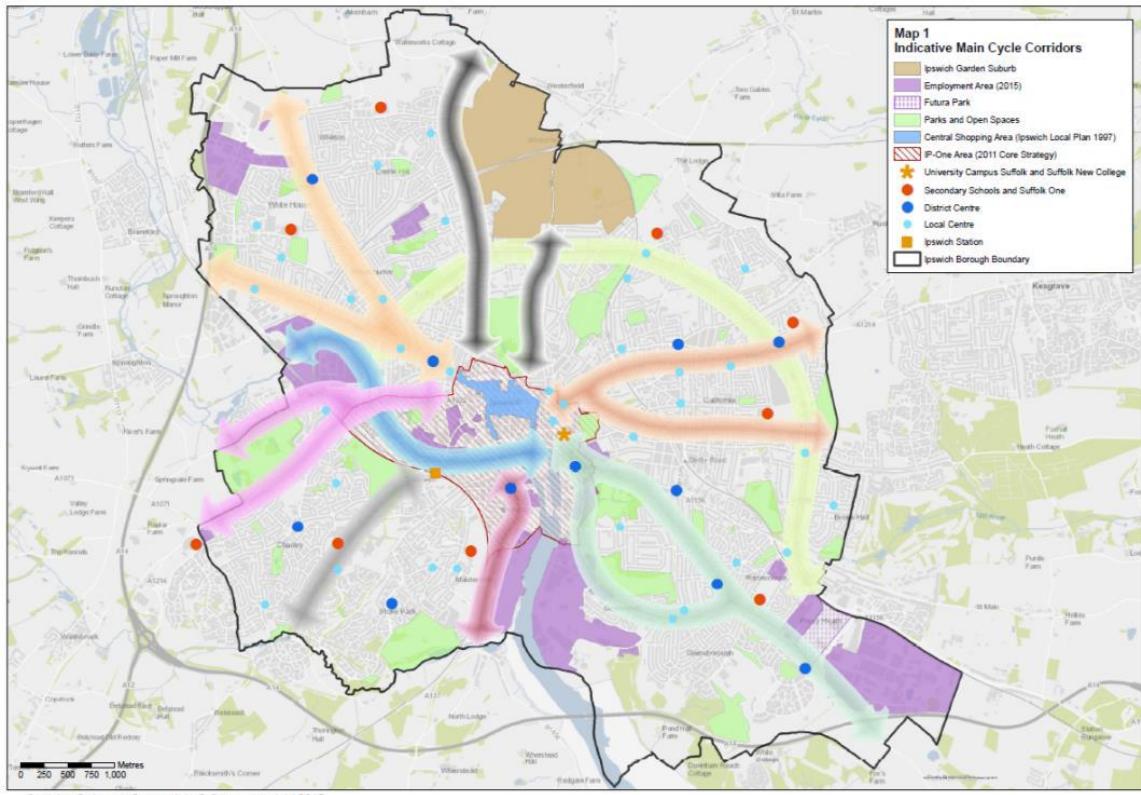
- Comparison of cycle routes and the proposed green trails in the Key Diagram

When cross-referencing the current Key Diagram and green trails with the Ipswich cycle map <http://www.greensuffolk.org/assets/Travel-Plans/Documents/Cycling/IpswichCycleMap.pdf> we have the following observations:

1. A green trail clearly suggests a “route”, but the Key Diagram map shows a green area.
2. Under no stretch of imagination would one call a road used by motor vehicles a green trail.
3. No cycle route through the Chantry Park part of the green trail.
4. No cycle route at all through the Humber Doucy Lane stretch of the green trail.
5. No cycle route through the Purdis Heath part of the green trail.
6. No cycle route through the Rushmere Heath part of the green trail.
7. No green cycle route other than Thurlestone Lane in the green trail above Whitton
8. No cycle route in the green trail between Ipswich and Westerfield.
9. No cycle routes through the Pipers Vale and Ravenswood other than a small dead-end stretch in the former and a looped cycle path around Ravenswood housing estate, which is hardly green.

- The Ipswich Cycling Strategy Supplementary Planning Document March 2016

This does not identify any of the Green Rim as cycling corridors as summarised in Map 1 Paragraph 6.12 reflects the Key Diagram. This clearly shows that the Green Rim was never intended as cycle routes and should not be reclassified as Green Trails.



Contains Ordnance Survey data © Crown copyright 2015.

- [Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018<sup>29</sup>](#) Jointly commissioned by Ipswich BC and neighbouring authorities

Pg 11 refers to the Green Rim in the context of the Ipswich Key Diagram stating “this green rim is intended to provide an ecological corridor and a recreational resource”. There is no reference to “trails” and if this was the intention one would have expected IBC to correct this reference as it is fundamental to the report.

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<sup>29</sup> <https://www.ipswich.gov.uk/sites/default/files/settlement-sensitivity-assessment-july2018.pdf>

## **Appendix 2 Extracts from The Institute of Air Quality Management and Environmental Protection UK guidance**

**6.22** The report prepared detailing the results of the assessment should contain the following information (but not necessarily in this order):

*j. Description of construction phase impacts.* These impacts will relate primarily to dust emissions, which give rise to dust soiling and elevated PM10 concentrations, although construction plant and vehicles may need assessment. The assessment should take into consideration the likely activities, duration and mitigation measures to be implemented. The distance over which impacts are likely to occur and an estimate of the number of properties likely to be affected should be included. This assessment should follow the guidance set out by the IAQM<sup>31</sup>

*m. Summary of the assessment results.* This should include:

- Impacts during the construction phase of the development (usually on dust soiling and PM10 concentrations);
- Any exceedances of the air quality objectives arising as a result of the development, or any worsening of a current breach (including the geographical extent);
- Whether the development will compromise or render inoperative the measures within an Air Quality Action Plan, where the development affects an AQMA.

**6.23** Most assessments are carried out for the first year of the proposed development's use, as this will generally represent the worst-case scenario. This is because background concentrations of some pollutants are predicted to decline in future years, as emissions from new vehicles are reduced by the progressive introduction of higher emissions standards. Where development is phased, however, it may also be appropriate to assess conditions for the opening years of each new phase.

This submission is **confirmed**

[26194]

**(Object)** Site Sheets, Site Ref: ISPA 4.1 (Policy SP2 & ISPA4) Northern End of Humber Doucy Lane

Respondent: [\*\*Derk Noske \[2526\]\*\*](#)

Received: **14/02/2020 via Web**

This site should remain as farmland to provide the Green Trail route outlined in the planning policy DM10 of the Ipswich Local Plan. Any additional housing would encroach on this pristine countryside that today provides easy access to green spaces as set out in the local plan

**Changes to plan:** No housing to be developed on these sites

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Written Representation

This submission is **confirmed**

[\[26195\]](#)

### Object Policy ISPA4 Cross Boundary Working to Deliver Sites

Respondent: [Derk Noske \[2526\]](#)

Received: **14/02/2020 via Web**

This site (ISPA4.1) should remain as farmland to provide the Green Trail route outlined in the planning policy DM10 of the Ipswich Local Plan. Any additional housing would encroach on this pristine countryside that today provides easy access to green spaces as set out in the local plan

**Changes to plan:** No housing to be developed on these sites.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Written Representation

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**O**



**Felicia Blake**

---

**From:** Michael Hammond  
**Sent:** 26 February 2020 11:40  
**To:** Suzanne Nugent  
**Cc:** PlanningPolicy  
**Subject:** RE: Representation to Ipswich Local Plan Review Final Draft Consultation - Allocation IP011b - Ortona Properties Ltd

Dear Suzanne,

Thank you for clarifying this. I will ensure the most recent version is uploaded when the representations are confirmed before being submitted to the Inspector.

Regards,

Michael

**Michael Hammond**  
Senior Planning Officer (Policy)  
Planning and Development

01473 432905  
[michael.hammond@ipswich.gov.uk](mailto:michael.hammond@ipswich.gov.uk)  
Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1 2DE

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**From:** Suzanne Nugent  
**Sent:** 26 February 2020 11:37  
**To:** Michael Hammond <[Michael.Hammond@ipswich.gov.uk](mailto:Michael.Hammond@ipswich.gov.uk)>  
**Cc:** PlanningPolicy <[PlanningPolicy@ipswich.gov.uk](mailto:PlanningPolicy@ipswich.gov.uk)>  
**Subject:** RE: Representation to Ipswich Local Plan Review Final Draft Consultation - Allocation IP011b - Ortona Properties Ltd

Dear Michael

Many thanks for your email. Our client supports the proposed 100% housing allocation.

I have amended our response form as such (please find attached) ; this therefore supersedes the one previously submitted.

Regards

Suzanne

**Suzanne Nugent Bsc (Hons) Msc MRTPI**  
**Planner**  
(my usual working days are Tuesday, Wednesday and Thursday)

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**From:** Michael Hammond <[Michael.Hammond@ipswich.gov.uk](mailto:Michael.Hammond@ipswich.gov.uk)>

**Sent:** 25 February 2020 12:21

**To:** Suzanne Nugent <[suzanne@plansurv.co.uk](mailto:suzanne@plansurv.co.uk)>

**Cc:** PlanningPolicy <[PlanningPolicy@ipswich.gov.uk](mailto:PlanningPolicy@ipswich.gov.uk)>

**Subject:** RE: Representation to Ipswich Local Plan Review Final Draft Consultation - Allocation IP011b - Ortona Properties Ltd

Dear Suzanne,

I was just wondering if you could please clarify your representation on IP011b so that when I summarise the rep I have not misrepresented your client's view.

Your representation states; "The landowner supports the existing allocation for the primary residential use and secondary employment use of the site."

Under the Final Draft Local Plan (Reg 19), we have removed the employment element of the allocation and are now allocating it solely for housing.

For the avoidance of doubt, please could you therefore confirm whether:

- Your opening sentence is an objection to the proposed change in the uses of the proposed allocation and that presumably you would only support if it returns to the originally adopted mixed-use allocation? Or
- You support the proposed 100% housing allocation?

Kind regards,

Michael

**Michael Hammond**  
Senior Planning Officer (Policy)  
Planning and Development

01473 432905

[michael.hammond@ipswich.gov.uk](mailto:michael.hammond@ipswich.gov.uk)  
Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1 2DE

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**From:** Suzanne Nugent <[suzanne.nugent@ipswich.gov.uk](mailto:suzanne.nugent@ipswich.gov.uk)>  
**Sent:** 25 February 2020 11:20  
**To:** PlanningPolicy <[PlanningPolicy@ipswich.gov.uk](mailto:PlanningPolicy@ipswich.gov.uk)>  
**Subject:** Representation to Ipswich Local Plan Review Final Draft Consultation - Allocation IP011b - Ortona Properties Ltd

Dear Planning Policy Team

Please find attached a representation in relation to Smart Street/Foundation Street (Allocation IP011b) on behalf of Ortona Properties Ltd.

I would be grateful if you could acknowledge receipt of this representation.

Many thanks

Kind regards

Suzanne

**Suzanne Nugent Bsc (Hons) Msc MRPI**  
Planner  
(my usual working days are Tuesday, Wednesday and Thursday)



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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.



website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	<b>Ipswich Local Plan Review Final Draft – Site Allocations and Policies</b>
Please return this comments form to:	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

#### PART A PERSONAL DETAILS

	1. Personal details	2. Agent's details (if applicable)
Title		Mrs
First name		Suzanne
Last name		Nugent
Job title ( <i>where relevant</i> )		Planner
Organisation ( <i>where relevant</i> )	Ortona Properties Ltd	PlanSurv Ltd
Address (Please include post code)	c/o PlanSurv Ltd	76 Broad Street Ely Cambridgeshire CB7 4BE
E-mail	c/o PlanSurv Ltd	-
Telephone No.	c/o PlanSurv Ltd	-

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Suzanne Nugent, PlanSurv Ltd on behalf of Ortona Properties Ltd
--	---

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
IP011b Smart Street/Foundation Street	The landowner (Ortona Properties Ltd) supports the allocation for the residential use of the site. The current use of the site remains as a bus depot under a lease agreement, but could come forward for development between the middle to end of the plan period. The site provides important linkage for the redevelopment of Merchants Quarter and would provide improved frontage along Star Lane, which in turn would provide visual enhancement to the Central and Wet Dock Conservation Areas.

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.

Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.

Adoption of the Ipswich Local Plan Review.

### PRIVACY NOTICE

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As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Felicia Blake**

---

**From:** Suzanne Nugent  
**Sent:** 25 February 2020 11:26  
**To:** PlanningPolicy  
**Subject:** Representation to Ipswich Local Plan Review Final Draft Consultation - Merchants Quarter/Allocation IPO54b - Ortona Properties Ltd  
**Attachments:** Ipswich Local Plan Review Final Draft\_Merchants Quarter IPO54b.pdf; Site Plan to representation IPO54b.pdf

Dear Planning Policy Team

Please find attached a representation in relation to Merchants Quarter/Allocation IPO54b on behalf of Ortona Properties Ltd. This comprises the response form and accompanying site plan.

I would be grateful if you could acknowledge receipt of this representation.

Many thanks

Kind regards

Suzanne

**Suzanne Nugent Bsc (Hons) Msc MRTPI**  
**Planner**  
(my usual working days are Tuesday, Wednesday and Thursday)



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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

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## **Consultation Comments Form**



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IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Ipswich Local Plan Review Final Draft- Site Allocations and Policies</b>
<b>Please return this comments form to:</b>	<b><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</b> <b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b>
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b> <b>Part B – Your comment(s).</b>

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>		<b>Mrs</b>
<b>First name</b>		<b>Suzanne</b>
<b>Last name</b>		<b>Nugent</b>
<b>Job title (where relevant)</b>		<b>Planner</b>
<b>Organisation (where relevant)</b>	<b>Ortona Properties Ltd</b>	<b>PlanSurv Ltd</b>
<b>Address (Please include post code)</b>	<b>c/o PlanSurv Ltd</b>	<b>76 Broad Street Ely Cambridgeshire CB7 4BE</b>
<b>E-mail</b>	<b>c/o PlanSurv Ltd</b>	
<b>Telephone No.</b>	<b>c/o PlanSurv Ltd</b>	

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Suzanne Nugent, PlanSurv Ltd on behalf of Ortona Properties Ltd
--	---

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Opportunity Area-Merchants Quarter/Allocation IP054b	<p>The Cattlemarket bus station is included within the opportunity area for Merchants Quarter, however the allocation reference IP054b should be extended north to include the bus station. The Local Plan states that the redevelopment of Merchants Quarter would provide key linkages from the Waterfront area to the centre of town. Therefore, the possible future redevelopment of part or all of the site could enhance connectivity by providing a pedestrian friendly residential/retail/employment area to link Turret Lane to Dogs Head Lane and the Buttermarket Shopping Centre.</p> <p>The land (as outlined in red on the attached plan) is currently under lease as its current bus station use, however given the wider regeneration aims for this area, the allocation IP054b should be extended north to include the whole of the opportunity area to allow for comprehensive redevelopment of the site. This would ensure that the plan remains flexible over the entire plan period, particularly towards the end of the plan period to allow for future residential/retail/employment use to come forward and thus ensure that the plan is sound.</p>

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

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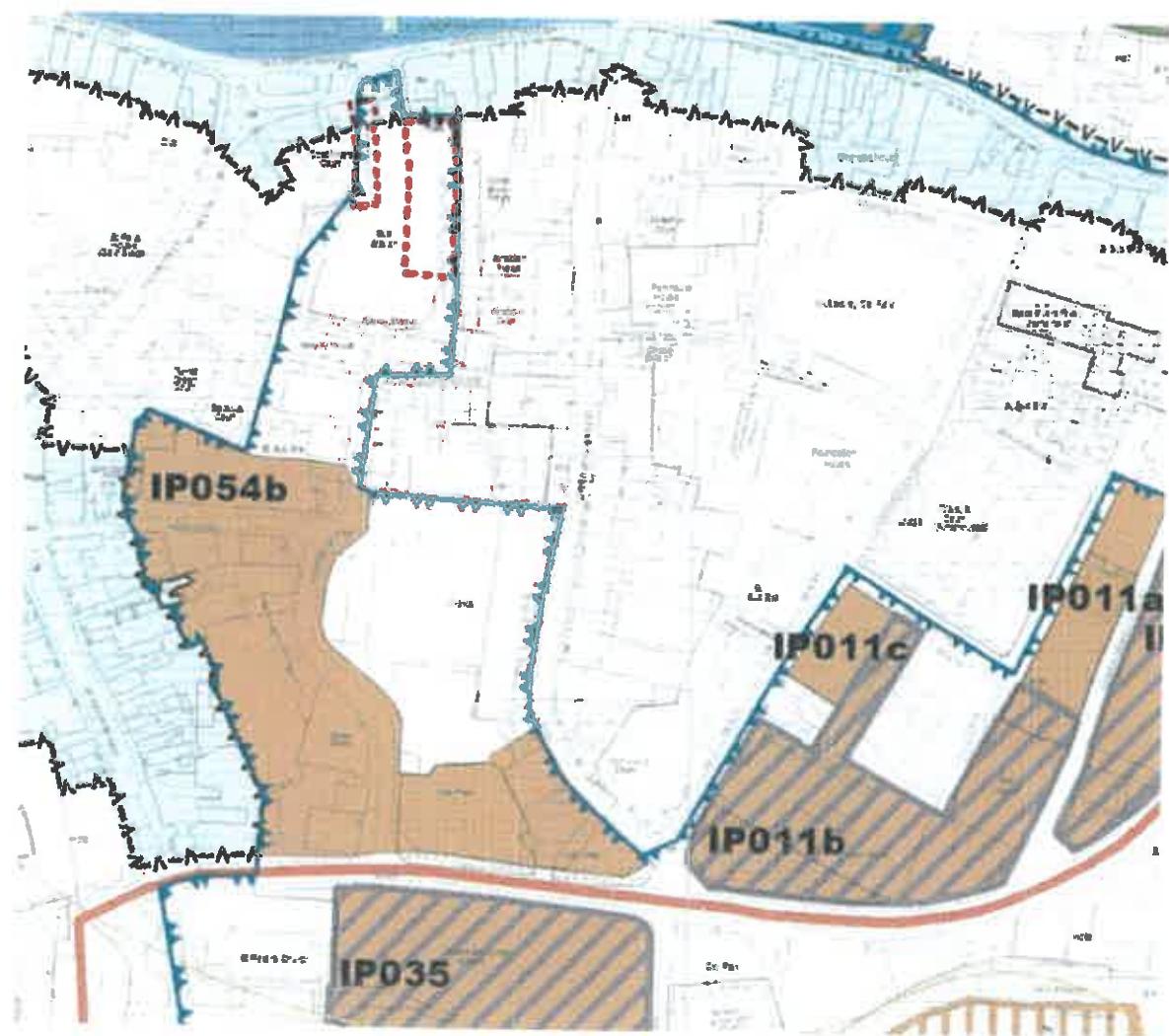
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As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Proposed allocation- Cattlemarket Bus Station**



— Ortona Properties Ltd land ownership

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**P**



**Felicia Blake**

---

**From:** dogol peezon  
**Sent:** 28 February 2020 09:16  
**To:** PlanningPolicy  
**Subject:** IP354 (72 old boatyard)

Dear Sir/Madam

Reference IP354 (72 old boatyard) Cullingham rd.

I write in connection with the above proposed planning application, I have examined the plans and I know the site well and wish to object strongly to the development of this land for housing. This would have an impact on the already busy road as well as having detrimental effect on the wildlife around the river bank. (Crested Newts). My property would also be overlooked by the development resulting in loss of privacy. Noise pollution from the said development would also have an impact. Cullingham rd has already issues with parking and this development would make this situation even worse. Access to the site for heavy machinery would be impossible as the road is not wide enough. Also the drainage and sewage from this new site will have significant overload on the already overcrowded road. I trust that the above objections will be taken fully into account in determining this application.

your sincerely

Margaret Pearson

**Felicia Blake**

---

**From:** Melville-Claxton, James  
**Sent:** 02 March 2020 11:45  
**To:** PlanningPolicy  
**Subject:** FW: Permission Homes Suffolk ipswich Borough Council Final Draft Local Plan representation  
**Attachments:** Persimmon Homes Suffolk representation.pdf

Please find attached a PDF version of the persimmon Homes representation on the IBC Final Draft Local Plan

Kind regards

James Melville-Claxton

Planner

Persimmon Homes Suffolk

Persimmon House

Orion Court

Great Blakenham

Ipswich

Suffolk

IP6 0LW

[www.persimmonhomes.com](http://www.persimmonhomes.com)

[www.charleschurch.com](http://www.charleschurch.com)

---

**From:** Melville-Claxton, James  
**Sent:** 02 March 2020 11:43  
**To:** 'PlanningPolicy@ipswich.gov.uk' <PlanningPolicy@ipswich.gov.uk>  
**Subject:** Permission Homes Suffolk ipswich Borough Council Final Draft Local Plan representation

**Persimmon Homes representation on the Ipswich Local Plan review final draft consultation.**

This representation is made by Persimmon Homes on the Final Draft of the Ipswich Borough Local Plan Review published for consultation between the 15<sup>th</sup> January and 2<sup>nd</sup> March 2020. Representations at this stage should only be made in relation to the legal compliance and soundness of the Final draft of the Local Plan, and using appropriate tests for soundness which a Local Plan must satisfy, it is considered that the Final Draft Plan is not Positively Prepared, Justified, or Effective for the reasons set out below.

### **Tests of Soundness**

The tests for soundness are set out in the 2019 revised National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:

- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

### **CS1 – Presumption In favour of Sustainable Development.**

The Revised NPPF confirms that the presumption in favour of sustainable development does not trump the statutory presumption in favour of the development plan set out in s38(6) of the Planning and Compulsory Purchase Act 2004. The wording of which is detailed at paragraph 2.2 of the final draft of the Core strategy and policies development plan. As such the inclusion of the model wording in Local Plans is no longer required. It is reasonable to consider that policy CS1 is not consistent with the National Policy and should be removed, in addition no robust justification for its continued inclusion in the document has been provided.

### **Duty to Cooperate.**

IBC completion delivery rates have been historically poor, and the Orwell Peninsula between Felixstowe and Ipswich provides a significant opportunity for growth. Through publication of the Government's "Planning for the right homes in the right places" the CLG standard methodology establishes that calculated figures for Ipswich's OAN have risen, in addition to OAN figures for adjoining authorities. In addition it is recognised within the Core Strategy that over the last two years house sales have fallen in Ipswich. As per the NPFF there is functional need for IBC, East Suffolk, and Babergh and Mid Suffolk to ensure development needs are met. However, there seems to be little recognition of the potential of this area, or detail provided on how East Suffolk District Council and Ipswich Borough Council have cooperated. The existing administrative boundaries which constrain Ipswich justify significant efforts to work with those neighbouring authorities as a priority on cross-boundary issues. This absence of detail weighs against how positively prepared the Final Draft of the Local has been and how effective its approach will be over the plan period, given that strategic matters such as housing needs should not be deferred, noting the opportunities that the east of Ipswich provides, in relation to housing delivery and infrastructure investment.

### **Market response to density of development.**

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Persimmon Homes hopes that these representations are of assistance in the development of Ipswich Borough's Local Plan. Please could Persimmon be notified of the submission of the draft Local Plan to the Secretary of State for Independent examination, and the publication of the Planning Inspectors report on the plan.

Yours sincerely,

l

**James Melville - Claxton  
Planner  
Persimmon Homes (Suffolk) Ltd**

[www.persimmonhomes.com](http://www.persimmonhomes.com)

[www.charleschurch.com](http://www.charleschurch.com)

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Persimmon Homes is proud to support local communities. Every year our Community Champions scheme donates £750,000 to local groups and our Building Futures scheme supports young people with donations of over £1 million. [Find out more...](#)



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Persimmon Homes Suffolk

Persimmon House

Orion Court

Great Blakenham

Ipswich

Suffolk

IP6 0LW

[www.persimmonhomes.com](http://www.persimmonhomes.com)

19<sup>th</sup> February 2020

Planning Policy,  
Planning and Development,  
Ipswich Borough Council,  
Grafton House,  
15-17 Russell Road,  
Ipswich,  
IP1 2DE.

**Persimmon Homes representation on the Ipswich Local Plan review final draft consultation.**

This representation is made by Persimmon Homes on the Final Draft of the Ipswich Borough Local Plan Review published for consultation between the 15<sup>th</sup> January and 2<sup>nd</sup> March 2020.

Representations at this stage should only be made in relation to the legal compliance and soundness of the Final draft of the Local Plan, and using appropriate tests for soundness which a Local Plan must satisfy, it is considered that the Final Draft Plan is not Positively Prepared, Justified, or Effective for the reasons set out below.

**Tests of Soundness**

The tests for soundness are set out in the 2019 revised National Planning Policy Framework (NPPF), paragraph 35. For a Plan to be sound it must be:

- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

### **CS1 – Presumption In favour of Sustainable Development.**

The Revised NPPF confirms that the presumption in favour of sustainable development does not trump the statutory presumption in favour of the development plan set out in s38(6) of the Planning and Compulsory Purchase Act 2004. The wording of which is detailed at paragraph 2.2 of the final draft of the Core strategy and policies development plan. As such the inclusion of the model wording in Local Plans is no longer required. It is reasonable to consider that policy CS1 is not consistent with the National Policy and should be removed, in addition no robust justification for its continued inclusion in the document has been provided.

### **Duty to Cooperate.**

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**Yours sincerely,**

**James Melville - Claxton  
Planner  
Persimmon Homes (Suffolk) Ltd**

**Felicia Blake**

88

**From:** Ella Murfet  
**Sent:** 02 March 2020 15:09  
**To:** PlanningPolicy  
**Cc:** Sophie Pain  
**Subject:** Ipswich Regulation 19 Consultation Response - Pigeon  
**Attachments:** Pigeon IBC Reg 19 Consultation Form.pdf; Pigeon IBC Reg 19 Consultation Response.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/Madam

Please find attached to this email a form and representation written on behalf of Pigeon to the Ipswich Borough Council Regulation 19 consultation.

I trust that this submission will be taken into account. If you could confirm receipt it would be appreciated. If you feel that you need any additional information or would like to discuss further, then please do not hesitate to contact me.

Kind regards  
Ella

Ella Murfet  
Senior Planner

## Turley

8 Quy Court,  
Colliers Lane  
Stow-cum-Quy  
Cambridge CB25 9AU

[turley.co.uk](http://turley.co.uk)  
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# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	<ul style="list-style-type: none"> <li>Core Strategy and Policies Development Plan Document Review Final Draft (January 2020)</li> <li>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft (January 2020)</li> <li>Statement of Compliance with the Duty to Co-Operate (January 2020)</li> <li>Statement of Common Ground (January 2020)</li> </ul>
Please return this comments form to:	<p><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</p> <p>Planning Policy Team      Planning and Development      Ipswich Borough Council      Grafton House      15-17 Russell Road      Ipswich      IP1 2DE</p>
Return by:	11.45pm Monday 2 <sup>nd</sup> March 2020
This form has two parts:	<p>Part A – Personal details</p> <p>Part B – Your comment(s).</p>

#### PART A PERSONAL DETAILS

	1. Personal details	2. Agent's details (if applicable)
Title	Mr	Miss
First name	Andrew	Ella
Last name	Fillmore	Murfet
Job title (where relevant)	Senior Planning Manager	Senior Planner
Organisation (where relevant)	Pigeon Investment Management Ltd	Turley
Address (Please include post code)	Linden Square 146 Kings Road Bury St Edmunds Suffolk IP33 3DJ	8 Quy Court Colliers Lane Stow-cum-Quy Cambridge CB25 9AU
E-mail		
Telephone No.		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation (*and client if you are an agent*):

Ella Murfet, Turley

Pigeon Investment Management Ltd

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>Please see accompanying statement.</p>

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.

Yes

Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.

Yes

Adoption of the Ipswich Local Plan Review.

Yes

**PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

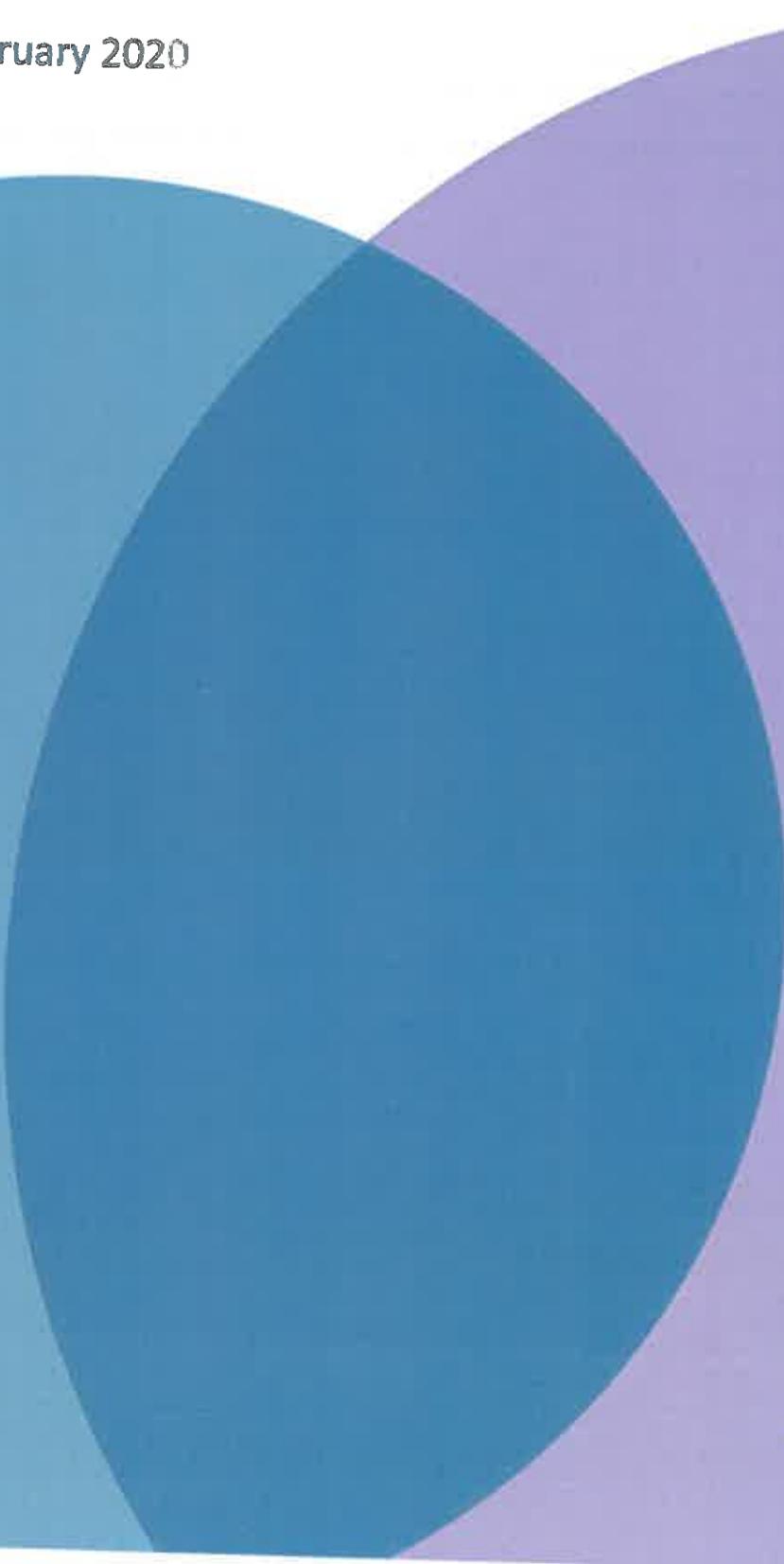
As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Representations to the Ipswich Local Plan  
Regulation 19 Consultation  
Ipswich Borough Council**

February 2020



Turley

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3.	Core Strategy and Policies Development Plan Document Review Final Draft (January 2020)	5
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Appendix 1: Pegasus Group Ipswich Core Strategy and Policies Development Plan Document Review		11

Ella Murfet  
ella.murfet@turley.co.uk

Client  
Pigeon Investment Management Limited

Our reference  
PIGC3021

19 Feb 2020

# **1. Introduction and Background**

- 1.1** This Statement has been prepared on behalf of Pigeon Investment Management Limited ('Pigeon'). It is in response to the Regulation 19 Consultation on the Draft Ipswich Local Plan. The comments made follow on from Pigeon's representation to the previous Regulation 18 Consultation on the Preferred Options Consultation In March 2019.
- 1.2** This submission does not seek to promote any specific sites for development, but rather contains responses in light of Pigeon's wider land interests. The overriding point that Pigeon wish to raise as part of the consultation, is that Ipswich Borough Council should be looking to neighbouring authorities in order to assist them with meeting their housing need. The Draft Local Plan raises concerns on the deliverability of housing, and therefore the 'soundness' of the document in line with the tests set out in paragraph 35 of the National Planning Policy Framework (NPPF).
- 1.3** This Statement contains responses on behalf of Pigeon to both the Core Strategy and Policies Development Plan Document Review Final Draft (January 2020) and the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft (January 2020). Comments are also made on the Statement of Compliance with the Duty to Co-Operate (January 2020) and the Statement of Common Ground (January 2020). This Statement is subsequently split to reflect the documents.

## **2. Duty to Co-operate**

- 2.1 Ipswich Borough Council forms part of the Ipswich Housing Market Area (IHMA) and Ipswich Functional Economic Area (IFEA), which also encompasses the former District of Suffolk Coastal District Council (now part of East Suffolk Council), Babergh District Council and Mid-Suffolk District Council. In accordance with the Localism Act 2011 and Paragraph 24 of the NPPF these local authorities are under a Duty to Co-operate with each other on strategic matters that cross administrative boundaries.
- 2.2 Paragraphs 25 and 26 of the NPPF state that:
- ‘25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans.
26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.’
- 2.3 From the earliest stages of the plan making process, the local authorities within the ISPA have been aware of the pressing issue relating to the unmet housing needs that will arise from Ipswich over the plan period. Indeed, the consideration of this issue is clearly expressed through the policies of the adopted Ipswich Local Plan (Policy CS6 ‘The Ipswich Policy Area’ and Policy CS7 ‘The Amount of Housing Required’).
- 2.4 This issue is also highlighted in the Inspector’s Report on the Examination of the Ipswich Local Plan, dated January 2017. At Paragraph 32 the Inspector concluded that:
- ‘Fundamentally, given the circumstances which the Ipswich Policy Area authorities currently find themselves in, there would be much to gain from the adoption of the submitted plans (subject to necessary modifications) as soon as possible. At the same time there would be likely to be little to lose in terms of getting firm proposals in place to address potential unmet housing needs. Consequently, adoption of the plans modified to require review to determine and deliver housing needs across the HMA for the long term, is thus soundly based.’
- 2.5 As part of Pigeon’s representations to the Regulation 18 Consultation, support was set out for the fact that a Duty to Co-operate Statement and working draft Statement of Common Ground (November 2018) had been published alongside the Ipswich Local Plan Review.
- 2.6 Within the Core Strategy and Policies Development Plan Document Review – Preferred Options (November 2018) the Council set out that they are actively engaged with Suffolk County Council and the neighbouring councils of East Suffolk, (Suffolk Coastal / Waveney Councils) and Babergh / Mid Suffolk on strategic growth matters, through the Ipswich Strategic Planning Area Board. The Ipswich Strategic Planning Area (ISPA) is an area that

has long been used for strategic planning purposes around Ipswich and consists of the Borough Council area plus a number of surrounding parishes.

- 2.7 It added that work is being undertaken through the Ipswich Strategic Planning Area Board which includes joint evidence gathering and agreement on joint approaches to the scale and distribution of future growth, cross boundary green infrastructure and strategic transport matters.
- 2.8 The Core Strategy and Policies Development Plan Document Review Final Draft (January 2020) retains this text, and as such Pigeon continue to support this approach.
- 2.9 The Statement of Common Ground (January 2020) again sets out that one of the strategic cross-boundary matters to be addressed is 'agreeing the approach to the delivery of the housing requirement'. In a variation to the draft version, the document states that:

'Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum housing number it is intending to deliver in its own area. Where, through the production of a Local Plan, it is evident that the need cannot be met within the local authority's boundary, a comprehensive re-assessment of land supply and deliverability will be undertaken. Following a comprehensive re-assessment of land supply and deliverability, and where unmet need remains, the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan. An appropriate approach will be dependent upon the scale of unmet need and the current status of other Local Plans in the ISPA'.

- 2.10 The document goes on to state that:

'as per paragraph 75 of the 2019 NPPF, Housing Action Plans will provide a mechanism for identifying actions to increase delivery where delivery falls below 95% of an authority's housing requirement (calculated over the previous three years). Each individual local authority may produce Housing Action Plans if required to do so by Government, and Councils may collaborate on the production of Housing Action Plans to support housing supply and delivery across the ISPA. The ISPA Board can consider any common or cross-boundary themes between two or more authorities.'

- 2.11 The Council have also published a Statement of Compliance with the Duty to Co-Operate (January 2020). As part of Pigeon's representations to the Regulation 18 Consultation, concerns were raised by Pigeon that the Council were not following their Duty to Co-operate, of working with neighbouring authorities to deliver a proportion of their housing requirements.
- 2.12 Within the Statement of Compliance with the Duty to Co-Operate (January 2020) the Council have stated that:

**'Ipswich Borough Council has demonstrated a significant level of co-operation with other authorities and public bodies in the preparation of the Final Draft Ipswich Local Plan. The Council has participated in and continues to participate in joint projects with other authorities on key evidence base documents and through regular meetings of the Ipswich Strategic Planning Area Board. The Council continues to work closely with key infrastructure providers to ensure the Local Plan will deliver the infrastructure required to support development in Ipswich Borough. It must be recognised that working with other bodies on strategic planning issues is an ongoing process and this statement will be updated periodically to reflect further progress.'**

- 2.13 The document then goes on to list the topics which are strategic cross boundary matters subject to the duty, and this includes housing. Table 1 sets out the strategic issue of housing, provides a summary of the Duty to Co-operate process. This table acknowledges that 'Ipswich Borough is tightly bounded and there is limited scope to meet housing needs solely within the Borough itself'. The Council therefore clearly recognise that the Council are unlikely to meet all of their housing needs in the Borough.
- 2.14 It is highlighted in the Statement of Compliance with the Duty to Co-Operate (January 2020) that a new policy (ISPA4) has been included in the Core Strategy and Policies Development Plan Document Review Final Draft (January 2020), and this is assessed in more detail in a subsequent section of this representation.
- 2.15 Overall Pigeon consider that the Statement of Compliance with the Duty to Co-Operate (January 2020) fails to demonstrate that the Council are complying with their Duty to Co-Operate, as the Council are not seeking to deliver enough of their housing requirements outside of the Ipswich Borough Council area.

### **3. Core Strategy and Policies Development Plan Document Review Final Draft (January 2020)**

#### **Policy ISPA4 – Cross Boundary Working to Deliver Sites**

- 3.1 Pigeon support the Council's inclusion of a policy that relates to the delivery of sites outside of the Borough. However, this policy remains almost the same as its version in the previous document, only including a little more detail. Furthermore, this policy relates solely to site ISPA4.1. It does not therefore provide any general policy support or guidance for delivering Ipswich Borough Council's housing need for 8,010 homes (Policy CS7), outside of the authority area, particularly given the stepped housing trajectory with less homes delivered at the start of the plan period.
- 3.2 The Site Sheet for ISPA4.1 sets out that the development would need to be 'delivered in coordination with the delivery of the Ipswich Garden Suburb to ensure that there is sufficient infrastructure capacity to meet demand'. The Ipswich Garden is assessed with further commentary within this representation, and in line with the conclusions of this, it is considered that reliance on the Ipswich Garden Suburb puts site ISPA4.1 at risk of delay.

#### **Policy CS2 – The Location and Nature of Development**

- 3.3 Pigeon support that this policy recognises under point (c) the need for Ipswich Borough Council to work with neighbouring authorities to address housing need within the Ipswich Housing Market Area (IHMA). Notwithstanding this, Pigeon object to the fact that this ambition still does not appear to be implemented in the Council's proposals for housing development.
- 3.4 The subtext to the policy sets out that the central urban focus to the location of development also reflects the sequential approach to site selection required by the NPPF (which encourages the use of previously developed land). However, Pigeon still seriously dispute the Council's ability to deliver housing on many of the brownfield sites, which are discussed in further detail in the following section of this report.
- 3.5 Within the policy subtext the Council add that later in the plan period after 2031, the Council's housing land supply opportunities within the Borough boundary become more limited. Therefore, there will be a need to consider future development opportunities beyond the boundaries within the neighbouring local authorities, particularly given the stepped housing trajectory with less homes delivered at the start of the plan period. In the first instance Pigeon are of the view that housing opportunities within the Borough are currently limited, and that there is a present need to consider sites beyond the boundary. This is evidenced by the statement made by the Council in the Statement of Compliance with the Duty to Co-Operate (January 2020) previously referenced in paragraph 2.10 of this representation, where they acknowledge the tight boundary and limited scope for housing. It is therefore considered that the Council are contradictory in their assessment, with there clearly being limited scope now, and not just after 2031.

- 3.6 In any case, there also does not appear to be any further evidence as to how housing will be delivered later in the plan period, and as such Pigeon have fundamental concerns that the Council have not explored these opportunities any further.
- 3.7 It is recommended that Ipswich Borough Council should look to sustainable locations which have good infrastructure, high accessibility to settlements with employment opportunities and connectivity to Ipswich. For example, neighbouring satellite villages around Ipswich such as Claydon, Sroughton and Wherstead can assist in delivering the housing growth to meet the objectively assessed need for housing in the Borough. These areas are well connected to Ipswich.

**Policy CS7 – The Amount of Housing Required**

- 3.8 Policy CS7 proposes a housing requirement for 8,010 homes in Ipswich across the period 2018-36. A detailed assessment of housing and economic needs have been produced by Pegasus Group on behalf of Pigeon, and this is contained within Appendix 1 of this representation.
- 3.9 The assessment concludes that Policy CS7 does not represent positive planning; it is not justified being contrary to the available evidence; it will not be effective in meeting demographic, economic or affordable housing needs; and it is inconsistent with the NPPF as well as numerous sections of the PPG.
- 3.10 In order to address this, the assessment concludes that it will be necessary to identify the housing need necessary to meet demographic and economic needs without increasing the need to travel as well as considering whether additional provision should be made to support affordable housing delivery and then setting a housing requirement which provides for the necessary significant boost to supply. The available evidence indicates that this is likely to result in a need for in excess of 11,500 homes in Ipswich.
- 3.11 In their assessment, Pegasus Group then conclude that having identified the housing need, it will then be necessary to consider whether this can be met within the Borough or whether it is appropriate to progress the Core Strategy Review with a constrained housing requirement with the remaining need to be met in the neighbouring authority area.
- 3.12 Policy CS7 sets out a policy with the minimum housing number that Ipswich Borough Council proposes to deliver in its area. The Housing Land Supply only amounts to a total of 7,214 dwellings, including an allowance for windfall development. Therefore, the Council already acknowledge that they have an unmet housing need of 1,597 dwellings over the Plan period, taking into account the 10% contingency that is allowed for in the final paragraph of the policy. Steps should therefore be taken with the ISPAB to now identify locations outside the boundary of Ipswich Borough Council where this unmet need can be accommodated. It is also considered by Pegasus Group that the proposed stepped housing requirement if supported provides no justification for not meeting housing needs in a timely fashion across the IHMA. Accordingly, if the stepped housing requirement is considered appropriate it will be necessary for corresponding stepped housing requirements (with a greater number in the early years to offset the lower number in Ipswich) in neighbouring LPAs to ensure that the existing housing backlog is addressed as soon as possible and to ensure that housing delivery does not continue to

**lag behind need as has been the case in Ipswich as reflected in the Housing Delivery Test result.**

#### **Policy CS10 – Ipswich Garden Suburb**

- 3.13 This urban extension is proposed to the north of the Ipswich Town. The policy text makes reference to the fact that this is the only area of extensive greenfield land still available within the Borough for development, due to the tight urban boundary. This demonstrates how limited the development opportunities within Ipswich Borough are.**
- 3.14 There is an adopted SPD for this site, and within this it states that ‘the success of the development of the Garden Suburb will depend to a large extent on the continued partnership working of the landowners, IBC and other key stakeholders to secure delivery’. This site is therefore reliant on multiple landowners coming forward and Pigeon would therefore argue that this complication will significantly delay the delivery of the development during the plan period. This concern should be afforded significant weight by the Council given that the Garden Suburb accounts for around half of the supply of housing.**

#### **Summary**

- 3.15 Therefore Pigeon retain the view that, whilst there appears to be much mention of Ipswich Borough Council working with neighbouring authorities, this does not appear to materialise into any real contribution to delivering housing outside of the Ipswich Borough Council area during the plan period. Despite the comments made by Pigeon previously as part of the Regulation 18 Consultation, the Council do not appear to have given these any significant weight.**
- 3.16 In addition, it is of significant concern that the Council are clearly unable to meet their housing need requirements (and the level of affordable housing needs within Ipswich) within the plan period in their own authority area and that the Plan does not address this issue accordingly.**

## **4. Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft (January 2020)**

- 4.1 This commentary focuses specifically on the residential site allocations that are proposed by the Council under this document. It does not form a detailed assessment of each individual allocation, but rather provides broad comments, and draws upon examples where appropriate. Pigeon made the argument in response to the Regulation 18 Consultation that many of the sites proposed for allocation cannot be considered deliverable under the definition provided in Annex 2 of the NPPF, and this is still considered to be the case.
- 4.2 The Council have had an Independent Whole Plan Viability Study (Aspinall Verdi, January 2020) undertaken and which now forms part of the evidence base, and there are concerning conclusions within the study. Not least at paragraph 8.18 where it is identified that the viability testing results on larger sites, including two brownfield sites (IP226 Helena Road/Patteson Road) and IPO37 (Island Site) have been shown to be unviable and that the Council will need to take a flexible approach to policies on these sites. Such conclusions are therefore already casting doubt over whether these two sites, which cumulatively are allocated for 758 dwellings, can be delivered within the Plan period.
- 4.3 The vast majority of sites proposed for allocation are previously developed land. Most of these sites appear to have contamination constraints and the Council do highlight this. Survey and remediation work will therefore inevitably delay the completion of development on such sites, which Pigeon flag up as an issue with the strategy. This is also likely to reduce the provision of affordable housing.
- 4.4 Furthermore the majority of these sites rely on relocation of other uses before the sites can be delivered. Those that will require relocation include businesses, various types of depots, Council services etc. There does not appear to be any evidence in most cases that relocation sites have been found or secured. Some of these existing establishments are fairly large scale facilities and so it is unclear where the space for these will be, particularly when so much development is being directed to other previously developed sites, and the Council acknowledge that greenfield sites are limited.
- 4.5 Pigeon therefore object to the amount of housing that is proposed on existing employment sites where uses will need to be relocated. If businesses are placed under pressure to relocate or displaced altogether then this would contravene economic development aspirations set out within the Plan. If businesses are not however willing, or are indeed put under pressure to relocate, then these sites cannot reasonably be considered as deliverable.
- 4.6 An example of this is the Bus Depot, Sir Alf Ramsey Way (IP004) which is allocated for 48 dwellings and 5,000sqm office space. The Site Sheet for this allocation states that there is a 'need to relocate the bus station first', and there is no confirmation that this has been attained. A further Depot and Beaconsfield Road (IP105) has been allocated for 15

dwellings. The Site Sheet for this allocation also states that there is a 'need to relocate the existing business first', and again there is no evidence that this is a realistic prospect.

- 4.7 A particularly complicated employment site is on Felixstowe Road (IP010b) which contains various employment uses and multiple owners according to the Site Sheet. This has been allocated for 62 dwellings and states that 'redevelopment is dependent on existing uses being relocated'. Given the multiple ownerships it would appear that this site will be a difficult one to progress, as not all occupants may want to relocate, particularly when it is unclear where they would be relocating to.
- 4.8 Land to the West of West End Road (IP120b) currently contains car showrooms, and has been allocated for 103 dwellings. Notwithstanding the constraints that this site is likely to have in terms of amenity impact of a commercial location, the Site Sheet also states that the 'existing uses would need to relocate'. There is no evidence that the occupants would be willing to relocate, and this seems unlikely given the location of the site.
- 4.9 Some of the proposed allocation sites are currently open space, amenity land or recreation grounds. There would either therefore be a loss of this space, or indeed provision would need to be reprovided. Again, there is no evidence that alternative sites have been found and if these would relate well to the parts of the community that would lose them. Pigeon object to this approach as allocating these sites will result in unacceptable and irreplaceable loss of open space for members of the public.
- 4.10 Many of the sites are car parks and constraints have been raised that parking would need to be reprovided, again with no indication that this has been considered, other than in a couple of examples where there is mention of an element of parking needing to remain on the sites. Pigeon are concerned that in order to deliver these sites, much needed car parking in the city will be lost, displacing cars and putting further pressures on road parking.
- 4.11 For example, the Car Park at Burrell Road (IP031a) is allocated for 20 dwellings. Covering an area of 0.44ha this provides a significant amount of car parking. It is not acknowledged on the Site Sheet how this provision would be replaced. A further example is Land between Old Cattle Market & Star Lane (IP054b) for which a large part of the site is currently used for car parking. The Site Sheet states that 'possible public car parking' would be included as part of the development, which does not provide any requirement for such a provision. It is considered that the loss of this facility would be of harm, given its location in the centre of Ipswich. A similar conclusion can be drawn from the allocation of a car park on Waterworks Street (IP089), for 23 dwellings. Again located in the centre of Ipswich with no apparent re-provision of the facility. All of these sites will add up to a significant loss of parking in the centre of Ipswich.
- 4.12 Several of the sites appear to be within industrial or commercial areas of the city which may have amenity issues for residents. This will be a constraint on any planning application that comes forward on such sites, and may limit the amount of development that can be delivered.
- 4.13 An example of this is the existing commercial building on Star Lane (IP043) which has been allocated for 50 dwellings. The Site Sheet sets out that the site is within the 'Urban Core' of Ipswich. The site is bounded on all sides by roads, and is surrounded by

commercial development, including warehouses, a depot, a swimming pool and various public houses and bars along the Quay. As such there are very likely to be noise and air quality issues arising on the site when pursued for residential use.

- 4.14 Some of the sites appear to be in protected employment areas, which would seem to conflict with the intention behind the designation of these parts of the city.
- 4.15 Land between Holywells Road and Holywells Park (IPO64a) is an example of this. This site is currently in use as offices and light industrial, and is allocated for 66 dwellings. It is however within existing employment allocation E11 and there does not appear to be any justification as to why this site is no longer considered to warrant protection from loss of employment. It is also highlighted that the site is surrounded by office and industrial development to the north, south and west boundaries, with the nearest residential uses some distance away. It is therefore considered to be a completely inappropriate location for residential development. The Site Sheet appears to justify this by setting out that the industrial uses immediately to the west of the employment area are also proposed for residential land, and as such the use is not incompatible. It can only be assumed that the Council are referring to site IPO98, which is not adjacent to IPO64a, but is separated by industrial uses. The site is constrained in its own right due to the need for a gas governor to be relocated, but in any case, the inclusion of this site bears no justification for the allocation of IPO64a.
- 4.16 Finally, the majority of sites identified for allocation are described to have medium or long term delivery timescales, with a much smaller number of short term sites. This is not in accordance with paragraph 68 of the NPPF. Furthermore, even some of the short term sites are subject to constraints that are set out above, and as such Pigeon think that the conclusion that they could be short term is overoptimistic.

### **Summary**

- 4.17 Therefore, Pigeon consider that the majority of the sites that the Council has proposed for residential allocation are subject to significant constraints that could delay, or indeed, ultimately prevent their delivery. Whilst many of the sites highlighted may be of a small to medium scale, it is considered that when combined, their implications on housing delivery could be significant. In any case, these provide only a snapshot of the constraints that are likely to impact upon many of the sites that are proposed for allocation.
- 4.18 In particular, Pigeon do not consider the approach of relocation of existing uses, where there is no reassurance that these can be successfully located elsewhere, as an appropriate strategy for delivering housing in Ipswich. Pigeon therefore strongly object to this approach, and suggest that the Council follow their Duty to Co-operate, of working with neighbouring authorities to deliver a proportion of their housing requirements.
- 4.19 Pigeon would welcome the opportunity to meet with the Council to discuss how their portfolio of sites could assist the Council in meeting their housing need on sustainable sites, close to Ipswich, but within the neighbouring authorities.

**Appendix 1: Pegasus Group Ipswich Core  
Strategy and Policies Development  
Plan Document Review**

# **IPSWICH CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW**

**ON BEHALF OF: PIGEON INVESTMENT MANAGEMENT LIMITED**

## **Pegasus Group**

Pegasus House | Querns Business Centre | Whitworth Road | Cirencester | Gloucestershire | GL7 1RT

T 01285 641717 | F 01285 642348 | W [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

**DESIGN | ENVIRONMENT | PLANNING | ECONOMICS | HERITAGE**

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## 1. SUMMARY

### Introduction

1.1 Pegasus Group has been instructed to prepare representations on the housing and economic needs identified in the Ipswich Core Strategy and Policies Development Plan Document Review.

### Policy CS7

1.2 Policy CS7 proposes a housing requirement for 8,010 homes in Ipswich across the period 2018-36. This is based upon the minimum local housing need of the standard method, but no consideration has been given as to whether it is appropriate to exceed this minimum in Ipswich as required by the PPG.

1.3 The circumstances in Ipswich and across the Housing Market Area indicate that there is a need to exceed this minimum. In particular:

- there is a recent assessment of housing need which demonstrates that the standard method significantly understates the local housing need which is one of the explicit examples identified in the PPG (2a-010) which necessitates exceeding the minimum;
- the evidence demonstrates that there are significant flaws in the demographic projections which inform the standard method and so the use of the standard method is not justified by the evidence;
- the Council's consultants have identified that where the standard method is subject to such flaws this should not be relied upon in other LPAs;
- once these flaws are corrected, the evidence demonstrates that there is a need for **10,050 homes** just to meet demographic needs;
- the evidence also demonstrates that to support economic growth as required by paragraph 80 of the NPPF, even assuming that in-commuting increases significantly, there would be a need for **9,850 homes**;
- if as required by paragraph 103 of the NPPF the need to travel is not increased and the commuting rates of 2011 are maintained, there would be a need for circa **11,589 homes**;

- the proposed housing requirement does not meet affordable housing needs and no consideration has been given as to whether this should be increased in response as required by the PPG (67-001).
- 1.4 As a result, the proposed housing requirement does not represent positive planning and it will not be effective including because it does not meet demographic, economic or affordable housing needs and it relies upon a greater proportion of in-commuters than is currently experienced. It is not justified as it is directly contrary to the available evidence and contrary to the advice of the Council's consultants elsewhere. It is also not consistent with numerous parts of national policy and guidance.
- 1.5 Policy CS7 also proposes to step the housing requirement without any apparent consideration of the effects of doing so including that:
- there is a significant backlog of housing need as evidenced by the Housing Delivery Test result of 46% (1% above that which would currently automatically engage the tilted balance of paragraph 11d of the NPPF) which will not be addressed until late in the plan period under a stepped housing requirement;
  - the demographic evidence does not justify a stepped requirement as it indicates that the number of households will increase at a broadly consistent pace, such that the proposed stepped housing requirement will result in additional households being unable to access appropriate accommodation.
- 1.6 The only justification given for the stepped requirement is the reliance upon large strategic allocations which will not be able to deliver in the early years of the plan period. This may provide an appropriate justification but if so, it would be necessary to ensure that corresponding stepped housing requirements (with a greater requirement in the early years) was adopted across the remainder of the Housing Market Area to ensure that households were still able to access appropriate and necessary accommodation in close proximity to Ipswich. Without these corresponding stepped requirements housing needs will remain unmet which does not represent positive planning, it is not effective, and it is not justified and furthermore it would be contrary to national policy in paragraphs 7 and 23 of the NPPF.

- 1.7 Within Policy CS7 it is also identified that a contingency allowance of 10% above the housing requirement will be planned for in order to boost delivery. This is necessary to accord with paragraph 59 of the NPPF and so it should be included in the housing requirement in accordance with the findings of numerous Local Plan Inspectors nationally. Without this modification, Policy CS7 will not be required to boost delivery contrary to the NPPF.
- 1.8 Policy CS7 also alludes to the supply over the plan period but no trajectory is provided to enable this to be considered, contrary to paragraph 73 of the NPPF. Pegasus Group reserve the right to address this matter when the necessary evidence is made available.

Policy ISPA1

- 1.9 Policy ISPA1 identifies that Ipswich Borough will contribute to employment and housing delivery across the Housing Market Area. Whilst the objective is to be welcomed, Policy ISPA1 specifies the employment land and housing requirement to be achieved across the Housing Market Area which is beyond the scope of this Local Plan.
- 1.10 It will be necessary for economic and housing needs to be tested separately in each LPA through their Local Plan examinations. It would be premature to include these as yet untested figures, which will change in the light of new evidence including the annual changes to the standard method, in the Ipswich Core Strategy Review.

**2. INTRODUCTION**

- 2.1 Pegasus Group are instructed to submit the following representations to the Ipswich Core Strategy and Policies Development Plan Document Review.
- 2.2 These representations focus on the housing and economic needs and corresponding supply.

### 3. POLICY CS7

#### The minimum local housing need

- 3.1 Table 8.1 of the draft Core Strategy Review identifies that the standard method produces a minimum local housing need for 445 new homes per annum or a total of **8,010 homes** in Ipswich Borough over the period 2018-36.
- 3.2 The standard method provides only the minimum local housing need. It takes no account of economic needs or specialist housing needs including those in need of affordable housing<sup>1</sup>. It is therefore appropriate to ensure that the housing need appropriately reflects these factors to ensure that the needs of different groups are addressed as required by paragraph 61 of the NPPF and that conditions are created to support economic growth as required by paragraph 80 of the NPPF.
- 3.3 The PPG (2a-010) confirms that it is necessary to take account of other factors and identifies that the need will be greater than the figure identified by the standard method in circumstances including where previous assessments of need have identified that the need is significantly greater.
- 3.4 The PPG (2a-008) also identifies that the standard method will change periodically and that as this changes, as it will in March 2020 owing to the release of new affordability information, the revised figure will need to be taken into account unless the Core Strategy Review has already been submitted for examination. Depending upon the date of submission, it may therefore be necessary to revise the minimum local housing need accordingly.

#### The SHMA

- 3.5 The Council jointly commissioned PBA to prepare the Ipswich and Waveney Strategic Housing Market Assessment, May 2017 (SHMA) which has undertaken a detailed analysis of housing needs across the Housing Market Area. This identifies that the 2014 based household projections which inform the standard method in Ipswich are flawed, such that to provide for demographic growth alone there is a need for 519 homes per annum rather than 445 homes per annum identified by the standard method.

<sup>1</sup> Although it does take account of the affordability of market housing.

- 3.6 The reason that PBA consider that the official projections are flawed in Ipswich relates to the accuracy of the mid-year estimates which inform the projections. In the period 2001-11, the mid-year estimates in Ipswich significantly underestimated the actual population growth. The ONS sought to correct the components of change within the mid-year estimates to accord with the actual population growth identified by the Censuses but were unable to do so, and so accounted for the remaining difference through unattributable population change (UPC). PBA assume that the errors in the mid-year population estimates from 2001-11 will continue to infect the mid-year estimates after 2011 and that an adjustment needs to be made to these and the resulting projections to correct this error.
- 3.7 The 2014 based projections used within the standard method remain unchanged and are therefore subject to the same flaws as identified in the SHMA according to the evidence of the Council. It would therefore be contrary to the available evidence to rely upon these projections and use the standard method without adjustment.
- 3.8 The Councils then commissioned PBA to prepare the SHMA Update, January 2019. This suggests that as the SHMA was prepared in line with the former NPPF, it is no longer relevant in relation to the identification of housing need and that the standard method should be used instead. However, as the SHMA has found that the official projections used within the standard method are flawed, it would be inappropriate to rely upon these within the standard method.
- 3.9 The recommendation of PBA to Ipswich Borough Council to disregard the identified flaws in the projections is directly contrary to the advice of PBA to other LPAs where they have found the projections to be flawed. Pegasus Group were involved in a S78 appeal with Tendring Borough Council<sup>2</sup> last year and the Council were represented by PBA who produced and defended evidence to demonstrate that the official projections were flawed in that Council area, as PBA claim they are in Ipswich, and that as a result the standard method was unreliable and should be disregarded. The S78 Inspector accepted the recommendation of PBA and concluded that:

**"As set out above, the Council accepts that it cannot demonstrate a 5YHLS, according to the standard method by which local housing need must be calculated for the purposes**

<sup>2</sup> APP/P1560/W/18/3196412

of this appeal. This is because it must deliver 857 dwellings per annum (dpa)...

However, the Council disputes that this figure represents the true housing need of the District because the 2014 population and household formation projections are seriously flawed for Tendring as a result of acknowledged issues of Unattributable Population Change (UPC)...

The Council states that the true housing requirement is 541dpa, although it accepts that figure has been derived through a different methodology...

The Council acknowledges that this figure was developed through the former NPPF, which adopted a different methodology including how the backlog is accounted for and in terms of the uplift for affordability...

But the Council maintains that the requirement is 541dpa (not 857dpa) because the effect of UPC is continuing. This is because the standard method uses the official 2014-based official projections, which take a base period of 2009-2014 and roll forward the trends in that period into the future. I agree with the Council that because the base period included two Inter-Censal years, which were affected by UPC, the resultant projection itself is likely to be affected by those errors. If these errors in the MYEs continued after 2011 then the effect of the infection of the 2014-based projections by UPC is greater...

But I agree that the continuing errors in the population projections arising from UPC raise significant questions about the validity of the local housing need figure of 857dpa. I consider it likely that this figure is an overestimate of the true housing need in the District."

3.10 Therefore, the evidence demonstrates that the official projections used within the standard method is flawed such that the standard method should not be relied upon in Ipswich, in accordance with the advice of the Council's consultants to other LPAs within the East of England.

3.11 The SHMA demonstrates that there is a need for at least 11,420 homes in the period 2014-36 to meet demographic needs. In the period 2014-18, a total of 1,363 homes have been delivered in Ipswich and 13 non-student bedspaces in communal establishments according to the MHCLG Live Table. The PPG (63-016a) provides the appropriate conversion factor to calculate the number of homes that a bedspace in a communal establishment would release to the market. Using this conversion factor, 13 bedspaces in Ipswich would equate to 7 homes. Therefore, given the completion of the equivalent of 1,370 homes in

Ipswich, there is a minimum residual need for **10,050 homes** or 558 per annum across the plan period 2018-36.

**The economic needs**

- 3.12 The economic circumstances of Ipswich are analysed in Appendix 1 which demonstrates that the economy of Ipswich has performed well regardless of the comparative under-supply of housing since 2011.
- 3.13 The number of jobs generated has vastly exceeded the growth in the economically active population and this is likely to have contributed to:
- the significant growth in the distance travelled by workers as they travel from across the region and beyond to access the high value jobs in Ipswich;
  - potential congestion issues; and
  - the increase in house prices as workers from further afield seek to relocate to Ipswich.
- 3.14 These unsustainable trends should be addressed by providing a better balance between labour supply and jobs without constraining economic growth. This will require a significant boost to housing supply from that delivered in the past within the Ipswich Housing Market Area to both address the comparative shortfall in housing delivery which has occurred and to maintain an appropriate balance thereafter.
- 3.15 The SHMA however assumes that the Ipswich Housing Market Area will become significantly more dependent upon workers commuting in from elsewhere. In Appendix H of the SHMA it is identified that in net terms 4,790 workers out-commuted from Babergh to other LPAs in 2014 but that this is assumed to increase to 5,070 by 2036; that 7,450 workers in-commuted to Ipswich in 2014 and that this will increase to 10,530 by 2036; that 7,100 workers out-commuted from Mid Suffolk in 2014 and that this will reduce to 4,100 by 2036; and that 6,760 out-commuted from Suffolk Coastal in 2014 but that this will reduce to 3,620 by 2036. In total, the SHMA therefore assumes that there will be a need for an additional 3,080 commuters to Ipswich but that the number of net commuters from the remainder of the Housing Market Area will reduce by 5,860. This will therefore require an additional 8,940 net in-commuters to the Housing Market Area over the plan period to support the job growth of 37,070 necessary to support economic growth. This equates to 75.9% of the jobs being filled by

residents of the Housing Market Area as compared to the 85.4% which existed in 2011 according to Table 3.11 of the SHMA.

- 3.16 This represents a significant growth in the dependence of the Housing Market Area upon In-commuting to sustain economic growth. This Inherent assumption within the SHMA will further increase the distance travelled by workers, add congestion to the transport network and create additional competition for housing in the area with consequent adverse effects on the affordability of housing. These adverse effects should be addressed through an uplift to the housing requirement both within Ipswich and across the Housing Market Area. The assumption within the SHMA that the need to travel will be required to increase is directly contrary to paragraph 103 of the NPPF.
- 3.17 Even with this Inherent assumption that the economic growth of Ipswich will be sustained through increased reliance upon In-commuting, the SHMA identifies that to support economic growth alone, there is a need for 11,220 homes in the period 2014-36<sup>3</sup>. Against this, there is a residual need for **9,850 homes** or 547 homes per annum across the plan period 2018-36 to provide for economic growth alone.
- 3.18 If the levels of self-containment which were experienced in 2011 are maintained (85.4%), the 37,070 jobs would require 5,412 net In-commuters. The SHMA however assumes that the number of net In-commuters will increase by 8,940. This equates to an additional 3,528 than would be experienced if 2011 rates were maintained. Therefore, in order to prevent the assumed increase of net In-commuting and the consequent adverse Impacts, it would be necessary to provide accommodation in addition to that identified by the SHMA for the 3,528 net In-commuters.
- 3.19 The SHMA identifies that an additional 838 homes would support an additional 1,700 jobs. Based on this Indicative rate, it would be necessary for an additional 1,739 homes to accommodate the 3,528 assumed additional In-commuters. This would result in a residual need for circa **11,589 homes** or 644 per annum over the period 2018-36.

<sup>3</sup> =10,382+838 homes as Identified in Table 8.1 of the SHMA.

### Affordable housing needs

- 3.20 The PPG (67-001) Identifies that where the needs of specific groups exceeds or is proportionately high compared to the overall housing need, strategic policy making authorities will need to consider the extent to which these needs can be addressed including whether a higher level of overall housing need should be identified. The specific groups include those in need of affordable housing.
- 3.21 The SHMA Identified in paragraph 7.12 that the demographic need of 519 homes per annum would accommodate 500 households per annum in Ipswich and in Table 4.3d It is Identified that this would equate to 11,005 households over the period 2014-36.
- 3.22 Of these 11,005 households, Table 4.3d of the SHMA Identifies that 2,702<sup>4</sup> (or 25%) will be in affordable need and Table 4.8d Identifies that an additional 1,075 (or 10%) will be need of discounted home ownership or starter homes. This totals **3,777 households** in affordable need (or 34%).
- 3.23 The SHMA Update undertakes similar analysis in Table 4.3d and Identifies that 2,014<sup>5</sup> (or 26%) of 7,715 households will be in affordable need and Table 4.8d identifies that an additional 804 (or 10%) will be need of discounted home ownership or starter homes. This totals **2,818 households** in affordable need (or 37%).
- 3.24 Policy CS10 Identifies that 31% of the homes provided at the Garden Suburb will be provided as affordable housing. The Garden Suburb is planned to deliver a total of approximately 3,500 dwellings and would therefore provide 1,085 affordable homes.
- 3.25 Based on the Identified housing requirement for 8,010 homes Identified in Policy CS7, there is a residual requirement for 4,510 homes outside of the Garden Suburb. Policy CS12 Indicates that only 15% affordable housing will be sought on other sites of 15 dwellings or more in this area, which would provide a maximum of 677 affordable homes even if every home was delivered on a site of 15 dwellings or more and that it delivered a policy compliant level of affordable housing.

<sup>4</sup> =553+2,149

<sup>5</sup> =436+1,578

- 3.26 Therefore, the draft Core Strategy Review will provide a maximum of 1,762 affordable homes, which equates to only 22% of the housing requirement. In reality, the delivery of affordable housing will be significantly less as many homes will be built on small sites which are not required to make any contribution.
- 3.27 It is therefore evident that the policies of the Core Strategy Review do not provide sufficient scope to meet the needs of at least 2,818 households in affordable need according to the SHMA Update.
- 3.28 In such circumstances, the PPG requires that consideration is given to whether it is appropriate to increase the overall housing need to better respond to the identified needs for affordable housing. Whilst it may not be possible or pragmatic to meet the affordable needs in full, the actions which could be taken to increase delivery at least need to be considered, but this does not appear to have happened in Ipswich.

#### Housing requirement

- 3.29 The available evidence demonstrates that the minimum local housing need identified by the standard method is insufficient to accommodate the households that are expected to arise in the Borough, that it is insufficient to support the economy and that there is a need to increase the housing requirement to better respond to the affordable housing needs within the Borough.
- 3.30 Nevertheless, Policy CS7 proposes a housing requirement based on the standard method. The evidence demonstrates that this does not meet the minimum housing needs of Ipswich and the inevitable consequence of constraining the supply of housing to the standard method will result in significant adverse effects on the ability of households to access suitable accommodation (including affordable housing) and on the economy.
- 3.31 The housing need relied upon in Policy CS7 as drafted is unsound as:
- It is not positively prepared including because it does not meet the objectively assessed needs as required by paragraph 35a) of the NPPF;
  - It is contrary to the available evidence and is therefore not justified;

- It is not justified as it directly contradicts the advice of the Council's consultants to other LPAs;
- It will not be effective as it does not meet demographic needs, affordable housing needs or economic needs;
- It is inconsistent with national policy as it increases the need to travel contrary to paragraph 103 of the NPPF;
- It is inconsistent with national policy, including because it does not reflect the needs of those in affordable housing need contrary to paragraph 61 of the NPPF; and
- It is inconsistent with national policy, including because it does not support economic growth contrary to paragraph 80 of the NPPF.

3.32 However, it should be recognised that Ipswich Borough Council has limited capacity to deliver housing. It may therefore be appropriate to identify a capacity constrained housing requirement for Ipswich Borough providing the resultant unmet needs are able to be addressed across the HMA. In order to do this, rather than constraining the need as proposed in the Core Strategy Review, it will be necessary to identify the unconstrained need and then identify the capacity of Ipswich Borough to meet this need and set the housing requirement at an appropriate level.

#### Stepped housing requirement

- 3.33 Policy CS7 proposes to step the housing requirement to provide for only 300 homes per annum in the period 2018-24 and then 518 homes per annum in the period 2024-36.
- 3.34 The official household projections upon which the standard method rely, indicate that the household growth is broadly consistent throughout the plan period with an average of 382 households per annum in the period 2018-24 and 383 households per annum in 2024-36. This means that the need for housing is consistent and provides no justification for adopting a stepped requirement.
- 3.35 At present, there are 2,894 households on the housing register seeking affordable housing in Ipswich. This demonstrates that there is a backlog of

housing need which should be addressed as soon as possible rather than delaying this through the use of a stepped housing requirement.

- 3.36 Furthermore, it is evident that there is significant record of under-delivery in Ipswich given that the Housing Delivery Test results show that only 46% of the number of homes required have been delivered over the previous three years. This shortfall should be addressed as soon as possible which is frustrated through the use of a stepped housing requirement (unless corresponding steps are identified in neighbouring areas to compensate).
- 3.37 The use of a stepped housing requirement also means that in the short-term newly arising housing needs will not be being met with significant adverse effects to those households who would otherwise have accessed the homes.
- 3.38 The proposed stepped requirement in Policy CS7 means that by 1<sup>st</sup> April 2024, only 1,800 homes will have been delivered in response to the identified annualised need for 2,670 homes<sup>6</sup> which as identified above does not meet the actual needs in Ipswich. This will therefore give rise to at least 870 households in need of housing for which no provision will have been made.
- 3.39 All the way through to at least 1<sup>st</sup> April 2035, there will remain households in need of housing for which no provision will have been made even against the standard method which does not provide for demographic, economic or affordable need.
- 3.40 It is acknowledged that in Ipswich Borough it may be appropriate to meet the plan period housing needs through larger strategic allocations and that this may justify the use of a stepped requirement in this LPA. However, this would require corresponding stepped requirements across the remainder of the HMA, with a higher housing requirement in the early years, to ensure that housing needs are met in a timely fashion across the HMA.
- 3.41 It does not appear that this strategic cross-boundary issue has been addressed under the duty-to-cooperate. The significant under-delivery of housing which arises from the unilateral stepped requirement proposed in Ipswich Borough is not therefore being addressed across the HMA and thereby gives rise to significant adverse effects. In the absence of such agreement, the stepped

<sup>6</sup> =445x6

housing requirement is not positively prepared, justified, or effective in meeting housing needs and it is contrary to paragraphs 7 and 23 of the NPPF.

### Contingency

- 3.42 Policy CS7 also identifies that to boost the supply of housing in Ipswich it is appropriate to incorporate a contingency of 10%. As this contingency is necessary to provide for the boost to housing supply as required by paragraph 59 of the NPPF, this should be included within the housing requirement.
- 3.43 This accords with the approach of numerous Local Plan Inspectors, who have identified that in order to secure the objectives of national policy, the necessary contingency should be included in the housing requirement, including at the Vale of Aylesbury Local Plan examination and the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy examination.
- 3.44 Without this additional 10%, the housing requirement of Policy CS7 would be ineffective in boosting supply and would be contrary to paragraph 59 of the NPPF.

### Supply

- 3.45 The necessary contingency is to be provided through a supply in excess of the minimum local housing need as identified in Table 3 of the Core Strategy Review.
- 3.46 However, the Council has not produced a trajectory which allows representors to assess whether the supply identified by the Council is deliverable and/or developable. The absence of such a trajectory is directly contrary to paragraph 73 of the NPPF.
- 3.47 It is therefore not possible to conclude upon whether there is a sufficient supply to meet the identified housing requirement over the plan period and Pegasus Group reserve the right to respond to the necessary evidence when this becomes available.
- 3.48 Similarly, the Council has not provided any evidence to demonstrate that they will be able to demonstrate a five-year housing land supply.
- 3.49 The supply relied upon by the Council is therefore unjustified in the absence of any evidence, it will not be effective in meeting housing needs and it is not consistent with national policy.

#### 4. POLICY ISPA1

- 4.1 Policy ISPA1 proposes that Ipswich Borough Council will contribute to the delivery of the minimum local housing need identified by the standard method across the HMA.
- 4.2 As set out in response to Policy CS7, given the acknowledged flaws in the projections within the standard method, this will be insufficient to meet the actual housing needs across the HMA.
- 4.3 Furthermore, as the housing needs of every LPA within the HMA are not being examined jointly, it is not possible or appropriate to identify the housing need across the HMA within the Ipswich Core Strategy Review. The component needs will be required to be considered through separate Local Plan examinations. In each of the emerging Local Plans it will be necessary for the capacity of the LPA to meet the need to be identified and for any unmet needs to be addressed across the remainder of the HMA under the duty to co-operate.
- 4.4 As the Joint Local Plan in Mid Suffolk and Babergh has yet to be subject to a Regulation 19 consultation, this will not be submitted for examination prior to March 2020. It will therefore be necessary for the minimum local housing need to be recalculated in these LPAs following the publication of the new affordability information in March 2020 to accord with the PPG (2a-008). The standard method will then generate a different figure both within Mid Suffolk and Babergh and across the HMA. The Government has also proposed to review the formulae within the standard method in October 2020. This will again change the minimum local housing need to be responded to in emerging Local Plans. As a result, the figure in ISPA1 will be out-of-date and will not accord with the minimum local housing need across the HMA. It is therefore inappropriate to include this figure within the Core Strategy Review.
- 4.5 However, the intent within Policy ISPA1 to address the as yet unknown housing needs across the HMA is to be welcomed.

## 5. CONCLUSIONS

- 5.1 As set out throughout these representations, Policy CS7 does not represent positive planning, It is not justified being contrary to the available evidence, It will not be effective in meeting demographic, economic or affordable housing needs, and It is Inconsistent with the social, economic and environmental objectives of the NPPF and specifically paragraphs 7, 23, 35a, 59, 60, 73 and 80 of the NPPF as well as numerous sections of the PPG.
- 5.2 In order to address this, It will be necessary to identify the housing need necessary to meet demographic and economic needs without increasing the need to travel as well as considering whether additional provision should be made to support affordable housing delivery and then setting a housing requirement which provides for the necessary significant boost to supply. The available evidence indicates that this is likely to result in a need for in excess of **11,500 homes in Ipswich**.
- 5.3 Having identified the housing need in accordance with the NPPF, It will then be necessary to consider whether this can be met within the Borough or whether it is appropriate to progress the Core Strategy Review with a constrained housing requirement with the remaining need to be met in neighbouring LPAs.
- 5.4 Furthermore, the justification for the proposed stepped housing requirement if supported provides no justification for not meeting housing needs in a timely fashion across the Housing Market Area. Accordingly, if the stepped housing requirement is considered appropriate it will be necessary for corresponding stepped housing requirements (with a greater number in the early years to offset the lower number in Ipswich) in neighbouring LPAs to ensure that the existing housing backlog is addressed as soon as possible and to ensure that housing delivery does not continue to lag behind need as has been the case in Ipswich as reflected in the Housing Delivery Test result.

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## APPENDIX 1

### ECONOMIC ANALYSIS OF HOUSING NEED

**A1. INTRODUCTION - IPSWICH LOCAL PLAN CONSULTATION**

A1.1 This appendix assesses housing need in Ipswich based on the economic need and conditions in Ipswich itself and with reference to the town's economic geography. That geography covers a large area beyond the town's boundaries, reflecting its role as a key regional employment centre.

A1.2 The paper assesses the economic components of housing demand and supply that are ultimately reflected in prices. These include employment and wage growth on the demand side, and housing stock growth on the supply side. Specifically, this means focussing on:

- Travel to Work Areas and commuting
- Housing and Labour Market Supply Growth
- Labour Demand (job) Growth
- Wage Growth – including changes in labour market structure
- House Prices and Inflation.

**A2. IPSWICH COMMUTING AND TRAVEL TO WORK AREA**

A2.1 A Travel to Work Area (TTWA) as defined by the Office for National Statistics is the area within which at least 75% of resident workers are employed. It is also the area within which at least 75% of those working also live. That is to say, the large majority of interactions between people's places of work and places of residence takes place within the defined area. These interactions, and the volumes of them, are the key drivers and influencers of local housing markets.

A2.2 The Ipswich Travel to Work Area, defined by the Office for National Statistics on the basis of 2011 Census commuting data, includes Ipswich and much of Babergh, Suffolk Coastal and Mid Suffolk districts. The area is shown in Figure 1 below.

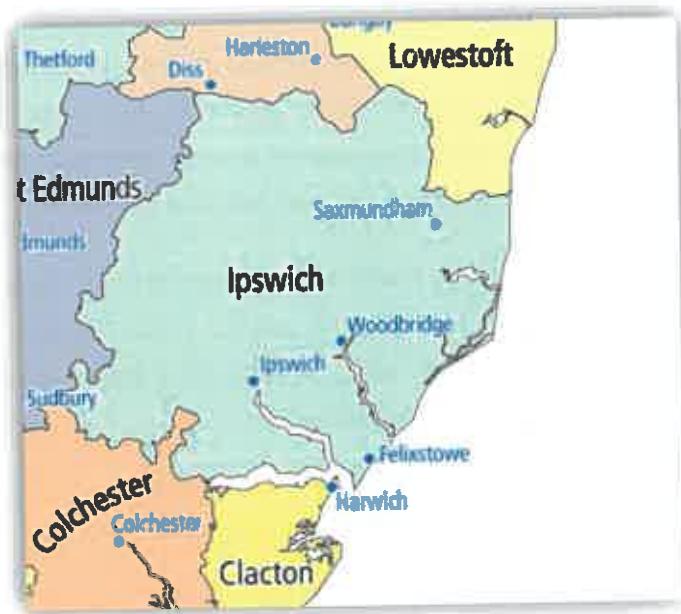


Figure 1: Ipswich Travel to Work Area. Source: ONS, 2011 Census

- A2.3 These four districts have been amalgamated for local planning purposes into the Functional Economic Market Area or FEMA, in accordance with the Strategic Housing Market Assessment, May 2017.
- A2.4 Analysis of census commuting data is vital for understanding the interdependences between housing and labour markets in the FEMA. Analysis shows that in 2011, Ipswich's neighbouring authorities (Suffolk Coastal, Babergh and Mid Suffolk) supplied over a third (34.3%) of its workforce<sup>7</sup>. This amounted to 21,145 workers and highlights the extent to which Ipswich was reliant on its neighbours for labour supply even in 2011.
- A2.5 Census data is increasingly out of date however, so it is important to note changes that have occurred since 2011. Labour markets of all districts have grown, most substantially in Ipswich by over 13%<sup>8</sup> with 10,000 jobs between 2012 and 2018.

<sup>7</sup> Ipswich Core Strategy Census Data Trends and Analysis; WSP for Ipswich Borough Council, February 2016

<sup>8</sup> ONS Total jobs, Change 2012-2017: Ipswich +10.9% Suffolk Coastal +3.3%

- A2.6 For commuting levels in Ipswich to remain similar today to those observed in 2011, an equivalent or similar growth of labour supply to that of the labour market would be needed, subject to transport mode share remaining constant.
- A2.7 In reality, as is set out later in this paper, Ipswich's labour supply has actually shrunk, meaning that the town's labour force expansion has had to be fed with imported labour. As a consequence, the level of in-commuting since 2011 will have increased substantially.
- A3. ASSESSMENT OF HISTORIC HOUSING SUPPLY**
- A3.1 There can be little doubt that a lack of housing supply growth is behind this acute labour supply shortage. Housing stock data<sup>9</sup> shows in the last 6 years that stock growth has been minimal across all the FEMAs districts, most notably in Ipswich itself where less than 275 homes a year have been built on average between 2011 and 2018. This represents a total expansion of housing stock over these 7 years of just 3.2%, the lowest of any local authority area in Suffolk and the fifth lowest of any in the East of England. In Babergh, which should be a key residential destination for Ipswich workers, the picture is little different, with stock growth of just 4.2% or 232 homes a year on average to 2018.
- A3.2 The relevance of this data in the neighbouring districts is important to note as these are areas that might otherwise provide a "release valve" to the pressure that has built in Ipswich as its economy and labour force has grown.
- A3.3 This lack of housing delivery is now also apparent in the latest results of the Government's Housing Delivery Test (HDT), released in February 2020. These show that Ipswich had the 9th lowest delivery rate in the country for the 3 years to 2019. Delivery of less than half (46%) the required level, means that the authority is now required to identify a 20% buffer when considering its five-year land supply and prepare an Action Plan to identify actions to increase housing delivery.
- A3.4 It is clear then that a startling imbalance has developed between job growth and labour supply growth in Ipswich. Not only this, but the neighbouring districts that would ordinarily take some of the development pressures arising from a rapidly growing employment centre, have provided little in the way of relief.

<sup>9</sup> Homes data from MHCLG Table LT125, Dwelling Stock Estimates.

A3.5 While the newly released HDT shows these districts have begun to respond in the last 3 years, the scale of under-delivery stretching back to the start of the current economic cycle<sup>10</sup> means that there is a considerable degree of catching up to be done in terms of housing supply.

#### A4. LABOUR MARKET IMBALANCE

A4.1 One of the results of a shortfall in housing delivery has been the lack of growth in the numbers of economically active residents in Ipswich. This cohort has completely stagnated and at times declined since 2012. ONS data show 73,000 economically active residents in 2011 and 71,900 in 2018. The picture in Suffolk Coastal, Babergh and Mid Suffolk is little different<sup>11</sup>.

A4.2 This demonstrates the extent to which the lack of local labour supply growth has meant the area's labour market expansion has had to be supported by labour imported from around the region, increasing the length of commuting journeys and of fostering unsustainable travel patterns.

A4.3 In tight labour markets where there are limited spare workers to fill new jobs, workers have to be imported from further afield. This adds pressure to the local housing market as imported workers seek to relocate and require housing in the area. As the post 2011 Census data shows (together with house price inflation of 41% in the Housing Market Area), Ipswich has generated substantial housing need as a result of its labour market growth far outstripping housing delivery growth.

A4.4 Between 2012 and 2018, Ipswich added 10,000 jobs<sup>12</sup>, representing labour market growth of over 13%. Job density meanwhile – the number of jobs relative to residents aged 16-64 – rose by 14.5% to 0.95 jobs per resident aged 16-64, indicating that Ipswich may soon become one of a comparatively few areas where the number of jobs exceeds the number of residents. This is normally the situation for large cities or smaller cities with exceptionally dense employment

<sup>10</sup> An economic cycle is the period covering a phase of both economic contraction and expansion. The current cycle began at the end of the last contraction in 2008/09 and is still active in 2020.

<sup>11</sup> ONS Annual Population Survey Data, All Economically Active People Jan-Dec 2012 to Jan-Dec 2017.

<sup>12</sup> ONS Total Jobs data, time-series, 2012-2018

clusters such as Oxford or Cambridge, with substantial labour supply provided by neighbouring areas.

- A4.5 As a comparison, South Cambridgeshire delivered 4,740 homes between 2011 and 2018, amounting to 677 homes per year and Cambridge 6,040 homes at 863 per year. This compares to the figures for Babergh and Ipswich of 232 and 273 homes per year respectively. Cambridge's labour market may have grown faster than Ipswich (22% vs 13%) but Ipswich is larger than Cambridge in population terms and its lack of housing supply response in comparison is clear.
- A4.6 It has been shown that Ipswich's labour supply and housing need is met in considerable part by its neighbouring authorities, evidenced by the TTWA data showing over a third of Ipswich workers in 2011 were residing in Babergh, Mid Suffolk and Suffolk Coastal.
- A4.7 It is possible to consider the effect on housing demand arising from this divergence between supply growth and demand (jobs and wage) growth. The graph at figure 2 shows house price growth in the blue shaded area, job growth in the red line, and dwelling stock change in the green bars.

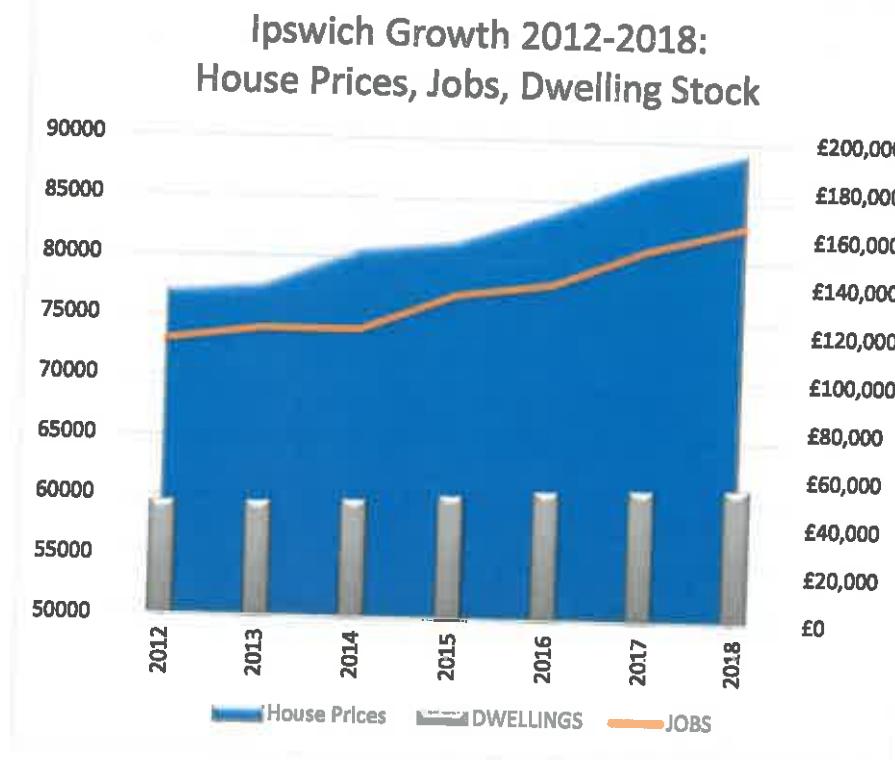


Figure 2: Ipswich Dwellings-Jobs-House Prices Change 2012-2018

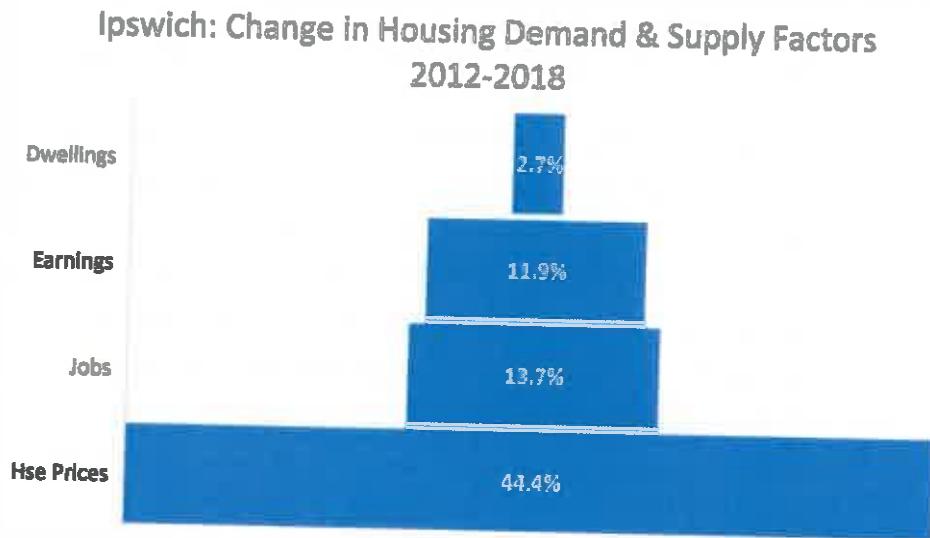
- A4.8 The graph shows how demand as represented by house prices has mirrored job growth as housing stock growth has stayed almost static by comparison.
- A4.9 Another key factor is wage growth, increasing by around 12% between 2012 and 2018. While aggregate wages have not increased to this extent nationally, it is clear that in Ipswich wage growth has been driven by a marked increase in higher value jobs in the area. The proportion of workers employed in top 3 occupational classifications reached over 50% in 2018, having been below 35% in 2012<sup>13</sup>. The effect of this is a significant increase in earning power in the local labour market due to growth in high earning positions.
- A4.10 Inevitably therefore, this growth and the structural changes in the labour market have driven house price inflation, as shown by the blue shading in the graph. This amounts to a 44% increase in prices between 2012 and 2018. Percentage growth for each demand and supply input and the result on prices is shown in Figure 3.

## A5. HOUSING SUPPLY CONCLUSIONS

- A5.1 As has been observed, Ipswich has seen growth of 10,000 jobs between 2012 and 2018<sup>14</sup> and 1,630 homes. The number of homes needed to maintain the balance of homes to jobs that existed in 2012, when house prices were over 44% lower and prior to the rapid labour market change described, can be calculated. This is done using the ratio of jobs to dwellings from 2012, which was 1.23.
- A5.2 Using this ratio, we can determine that in 2018, the number of homes needed in Ipswich to maintain the ratio to jobs in 2012 would be 67,742. The actual number of homes in 2018 stood at 61,210, a deficit of 6,672 homes. This calculation demonstrates the imbalance between housing supply and economic growth which is likely to have contributed to the increases in house prices locally.

<sup>13</sup> ONS Annual Population Survey data, ONS SOC 2010 Classifications

<sup>14</sup> ONS Total Jobs Data, Time-series



*Figure 3: Change in Housing Demand & Supply Factors: Effect on Prices*

- A5.3 In reality, ambitious business growth plans for Ipswich, Felixstowe and the wider region indicate further substantial job growth can be expected throughout the Ipswich HMA that will need to be supported with a far greater local labour supply and housing supply response than has been in evidence to date.
- A5.4 The Local Enterprise Partnership has targeted job growth of 88,000 by 2036. If we assume half of this occurred in Suffolk, 44,000 new jobs in Suffolk would represent a 12% growth in job numbers.
- A5.5 If housing growth remains as limited as has been shown in this paper, the Economic Development ambitions of the Local Enterprise Partnership will go unrealised. It is highly unlikely that the further labour supply required could be found given that all data already suggests that the limits of Labour Market Importing have been reached.
- A5.6 Accessibility and sustainability pressures are likely to have caused transport network problems which may have contributed to the need for the "Ipswich Northern Route Project" to create a new route north of Ipswich. Ongoing attempts to agree and select a route however mean this project remains some way off. Government data shows that vehicle miles travelled in Suffolk between the 2012-2018 growth period analysed in this report, increased by 16.5%<sup>15</sup>. This is equivalent to more than 600,000 additional miles travelled on the county's

<sup>15</sup> DFT Traffic Count Data for Suffolk, via <https://roadtraffic.dft.gov.uk/local-authorities/126>

roads in just five years. This further underlines the extent of the imported labour described in this report and the resulting sustainability issues that arise.

- A5.7 What is clear is that Ipswich has become a major regional growth hub for high-quality, higher earning employment, driving a growing housing need. The positive economic development story has taken place in spite of the lack of local labour supply, which has simply had to be drawn from across the region. The effect is seen in house prices, transport and sustainability pressures. To address this and to give the future growth ambitions of the LEP a chance of being achieved, a major supply response is required. A calculation to show the level of housing that would have been supplied if delivery had kept pace with economic growth since 2012, shows that Ipswich is nearly 7,000 homes "behind the curve" relative to its economic development. This is a clear demonstration of the extent of the supply response that is required in (and around) Ipswich.

**Turley Office**  
8 Quy Court  
Colliers Lane  
Stow-cum-Quy  
Cambridge  
CB25 9AU

**Turley**

## **Felicia Blake**

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**From:** Jo Porter  
**Sent:** 02 March 2020 12:29  
**To:** PlanningPolicy  
**Subject:** Final Local Plan - Draft - reposnse to consultation

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Planning

I strongly object to the proposed site allocation for future housing development on the site shared with East Suffolk - ISPA 4.1 and IP303.

The area considered corresponds with East Suffolk SCLP 12.24 which considers a much wider area of the countryside and joins in with the proposed

SCLP12.24. Developing an area as large as this will create an urban effect in a rural area, destroy habitats, trees, hedges and crops. It will create air pollution, drainage issues (which are already to capacity). The traffic infrastructure is not capable, Tuddenham Road is a main route from villages such as Westerfield, Tuddenham, Clopton and Grundisburgh into the town of Ipswich. Humber Doucy Lane is also used as a main route and can be stacked back some distance in heavy traffic, it will not cope with such a large amount of potential traffic. The local high school is already to capacity and the local primary school cannot take on futher development already being a school of 630 primary school children. The plan suggests that this area would be an overflow for the Northern Fringe development - has there been consideration to the volume of traffic that goes along Humber Doucy Lane and Tuddenham Road. There is no safe route to cross that busy road(s). Also there is suggestion that a nursery would be built on the land that will ease the need in Witnesham. Witnesham is several miles away and this would require parents to travel in their cars to get too - meaning that there would be even more traffic.

The proposal fails to fully take adequate and comprehensive account of transport, air quality, economy and wastewater issues; specifically that the possibility that the viability of development of the 'Garden Suburb', in combination with all the other cross boundary proposals of East Coast /Waveney, may not be sustainably achieved due to the plans severe impacts on air quality, traffic and lack of sewage infrastructure.

This area attracts endangered wildlife and habitats for a variety of animals, destroying this area would be harmful and detrimental to policies set out in the existing local plan. It will destroy designated green space and also green rim space and goes against the following Suffolk Coastal District Council Core Strategy and Development Management Development Plan policies

**SP1 Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**SP1A Presumption in Favour of Sustainable Development (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**SP16 Sport and Play (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**SP19 Settlement Policy (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**SP29 The Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**DM3 Housing in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**DM4 Housing in Clusters in the Countryside (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**DM23 Residential Amenity (Suffolk Coastal District Local Plan Core Strategy and Development Management Policies adopted July 2013)**

**SP15 Landscape and Townscape**

**DM21 - Aesthetics**

**There have been many planning applications refused in this area, this site will go against SCDC own reasonings for refusing planning in the past.**

**It will have a huge detrimental impact to residents on Tuddenham Lane the extra noise in a peaceful rural countryside setting, traffic into the area, loss of natural light. I walk my children to/from school via the footpath through a nearby field, it is already extremely busy and troublesome to cross Humber Doucy Lane with further development of this area would make it near on impossible to cross the already busy speeding road.**

**IF, this plan is agreed then there MUST be consideration for drainage, safety with regards to traffic overload, cycle lanes and dual school catchment areas with a reduced amount of proposed dwellings - over 600 houses is too high and this will inevitably destroy the countryside which it will border.**

**I trust you will take my comments on board and address the above concerns.**

**J Porter**

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**R**



This submission is confirmed

[26331]

### Object Chapter 1 - Introduction

Respondent: **Ravenswood Environmental Group (Mr Robert Eburne) [2469]**

Received: 02/03/2020 via Web

The plan is poorly prepared and presented and is very difficult to read. It lacks justification and its policies are neither useful to developers or decisionmakers. It is the most poorly presented plan in the region. It needs to demonstrate cross boundary working as happens in Greater Norwich and Greater Cambridge and it needs criteria based policies so that it can be held to account by the public and used successfully by developers. It is vague and the environmental impacts are not justified.

**Changes to plan:** The plan needs to be rewritten following a proper cooperation with the public and neighbouring Councils.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** Because written representations alone are statistically highly unlikely to be effective in changing local plans

This submission is confirmed

[26332]

### Object Policy SP2 - Land Allocated for Housing

Respondent: Ravenswood Environmental Group (Mr Robert Eburne) [2469]

Received: 02/03/2020 via Web

Not justified

**Changes to plan:** Plan needs to be rewritten to justify sites with criteria based policies which deal with the mitigation of development impacts.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To represent the views of a group of residents and environmental interests

This submission is confirmed

[26333]

### Object Chapter 1 - Introduction

 Has attachments

Respondent: **Ravenswood Environmental Group (Mr Robert Eburne) [2469]**

Received: 02/03/2020 via Web

The plan has not been positively prepared and is poorly presented in an illogical way. There is no cooperation between local authorities such as has happened around Cambridge or Norwich. The plan contains disjointed lists of sites and does nothing to assist decision makers to establish what is or is not acceptable or how various constraints would be overcome.

**Changes to plan:** Rewrite the plan. Cooperate properly with the public and cross border authorities.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** to represent the views of the community

This submission is confirmed

[26334]

**Object Policy SP3 - Land with Planning Permission or Awaiting a Section 106, IP150a – Ravenswood S & T (Adjacent Fen Bright Circle)**

**Respondent:** Ravenswood Environmental Group (Mr Robert Eburne) [2469]

**Received:** 02/03/2020 via Web

The Online consultation refers to this as being sites Sand T but these were built out prior to April 2019, The correct reference should be sites U, V, W. It is questioned whether these can be stated as having planning permission as they relate to an historic Outline Planning Permission which is no longer extant.

**Changes to plan:** The plan should contain a policy which explains what is proposed for sites U, V , W given that the sites no longer have planning consent and it would be unreasonable to rely on an old planning permission to guide what would be proposed. The site has been removed from the plan without justification.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To represent the views of a number of individuals

This submission is confirmed

[26335]

**Object Policy SP7 – Land Allocated for Leisure Uses or Community Facilities**

**Respondent:** Ravenswood Environmental Group (Mr Robert Eburne) [2469]

**Received:** 02/03/2020 via Web

The Sports Park proposal is vague and unjustified. The plan does not explain what a sports park is or how the ecological impacts of its development would be mitigated

**Changes to plan:** Delete the proposed sports park from the plan Site iP150b

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To represent the views of a group of individuals

This submission is confirmed

[26336]

**Object Policy SP5 – Land Allocated for Employment Use**

**Respondent:** Ravenswood Environmental Group (Mr Robert Eburne) [2469]

**Received:** 02/03/2020 via Web

The Ravenswood employment sites should be planned so as to mitigate traffic impacts and be masterplanned with residential development

**Changes to plan:** The whole area should be masterplanned so that environmental impacts are considered.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To represent local views

This submission is confirmed

[26337]

## Object Policy SP2 - Land Allocated for Housing

Has attachments

Respondent: Ravenswood Environmental Group (Mr Robert Eburne) [2469]

Received: 02/03/2020 via Web

The Policy is supported by site sheets in an appendix. The appendix should make it clear that the site sheets are or are not part of the plan. The plan is vague and unjustified. Site IP150 e is adjacent to other sites such as IP150c and IP150e and IP150d. These are geographically related but they are separate in the plan. There is no justification for this piecemeal approach. The plan highlights serious traffic, air-quality, ecology, amenity and heritage constraints but does nothing to resolve these and does not insist upon masterplanning and effective mitigation.

**Changes to plan:** Propose a new policy to present all of the plans for Ravenswood so that the various sites can be effectively masterplanned and environmental mitigation proposed. It is unacceptable to propose development only with a list of issues whilst not inviting or suggesting how these would be resolved.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

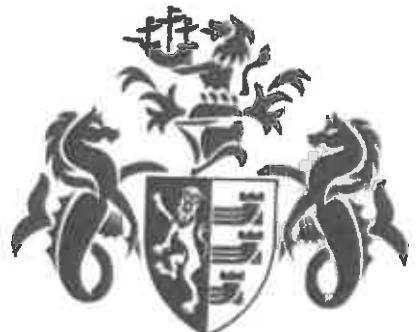
**Reason for appearance:** To represent the views of a number of individuals and to present more detailed evidence

# **Public Consultation Ipswich Local Plan Review Preferred Options**

**16<sup>th</sup> January – 13<sup>th</sup> March 2019**

**Town & Country Planning (Local Planning) (England) Regulations  
2012 (Regulation 18)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Planning documents to which this comments form relates:	Ipswich Local Plan Review Preferred Options
Please return this comments form to:	<p><u>planningpolicy@ipswich.gov.uk</u> or            Planning and Development            Ipswich Borough Council            Grafton House            15-17 Russell Road            Ipswich            IP1 2DE</p>
Return by:	11.45pm Wednesday 13 <sup>th</sup> March 2019
This form has two parts:	Part A – Personal details  Part B – Your comment(s).

#### PART A PERSONAL DETAILS

	1. Personal details	2. Agent's details (if applicable)
Title	Mr	
First name	Robert	
Last name	Eburne	
Job title (where relevant)		
Organisation (where relevant)	Ravenswood Environmental Group	
Address Please include post code		
E-mail Telephone No.		

**Signature:** ..... Date: .....12/03/2019.....  
 For individuals only (not applicable to organisations), we would like to add your contact details to the Local Plan Review consultation database so that we can contact you in the future regarding planning matters.  
 Please put a tick in the box if you consent to us holding your details.

**PART B Comments about the Ipswich Local Plan Review Preferred Options**

Your name or organisation (and client if you are an agent):

Mr Robert Eburne (Ravenswood Environmental Group)

Please comment on any or all of the sections, chapters or sites in the Ipswich Local Plan Review Preferred Options documents and specify which sections, chapters or site(s) you are commenting upon.

Section/Chapter or Site reference:	Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)
<b>Paragraph 6.8 The Objectives</b>	The Local Plan Documentation does not deliver upon the stated Objectives and does not comply with significant swathes of national planning policy contained in the NPPF (February 2019) and elsewhere. Notably the Local Plan Policies and their associated justification are in conflict with, chapters 3, 5, 8, 9, 12, 14, 15 and 16 of the NPPF. It is alarming that the plan already fails to meet basic requirements of plan making as initially set out in paragraph 16 of the NPPF.
<b>Strategic Environmental Assessment and Sustainability Appraisal</b>	The traffic-light scoring system used throughout the SA is inaccurate insofar as it relates to various sites within Ravenswood. The SA is also not consistent with the SHEELAA also from January 2019 which again uses a Red, Amber, Green scoring system and incorrectly scores sites which are known to have negative issues associate with them. The SA results of each of the sites pertaining to the Ravenswood locality are questioned. These sites are IP150a, IP150b, IP150c (omitted from SA), IP150d, IP150e and IP152. The SA does not assess these sites cumulatively and that is a crucial failing of policy making here. These sites cumulatively have a negative impact on the SPA and visitor pressure is already too great and associated management too poor to allow further development and population here.
<b>Statement of Common Ground November 2018 (between Councils)</b>	The Statement of Common Ground in relation to Strategic Cross Boundary Planning Matters is weak. Given that Ipswich cannot meet its own development needs it is of some concern that a closer working arrangement has not been created. Ipswich is an important sub regional centre. The other two similar centres in the region are Norwich and Cambridge. Norwich City is planned as part of the Greater Norwich Local Plan with Broadland and South Norfolk. Cambridge is planned with South Cambridgeshire as Greater Cambridgeshire but Ipswich is not coordinating its growth on the same statutory basis. Consideration must be given to a joint Local Plan.
<b>Sites IP150a, IP150b, IP150c, IP150d, IP150e and IP152</b>	The Ravenswood locality includes 6 proposed allocated sites, 5 of which sit directly adjacent to each other. The 6 <sup>th</sup> site is IP150a which is a residual part of the 2007 Outline Planning Permission. The total area of these 6 sites is 24 Hectares of development land being allocated in a piecemeal fashion in different parts of the Local Plan but in the same location in the ground. A minimum of 254 homes are proposed on these sites along with very large areas of Class B1, B2 and B8 development, a Sports Park, park and Ride etc. There are hints that one or other of these sites should be masterplanned but no policy mandate exists to do this. It seems that an accumulation of allocations are being put in one place without any credible

Section/Chapter or Site reference:	Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)
	<p>consideration of how they relate one to another or of what the cumulative impact of this development would be on: traffic, residential amenity, various protected sites (including Nature Reserves and an SPA), air quality, noise, and the environment generally. Such a large centre of development needs a clear policy environment relating to access but there is nothing firm in the plan on this matter. The plan fails to satisfy the requirements of paragraph 16d of the NPPF which states that Local Plans should "<u>contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals</u>" The plan is not justified or positively prepared. It is not effective as there is no clarity as to what is expected of proposals which are put forward in such a piecemeal and haphazard way. The plan is trying to allocate a large site via "stealth", whereby an accumulation of sites are hidden away in various policy lists but, in reality, a very large urban extension is proposed without appropriate heritage, landscape, ecology and environmental mitigation or Environmental Assessment.</p>
IP150a (SP3)	<p>This site is allocated by policy SP3 but it doesn't particularly fall within that category. It is debatable whether this site can be delivered on the basis of the 2007 Outline Planning Permission following the refusal of Reserved Matters Consent so long ago. Given that the Council's strategy for the site has been rejected by the Planning Inspectorate, it is essential that the Local Plan contains a criteria based policy saying in what circumstances a detailed planning permission would be granted. The Local Plan gives decision makers no direction about the site's future. The SHELAAs refers to this site as a brownfield site but it is clearly a greenfield site.</p>
Policy CS12	<p>The promotion of affordable housing is welcomed but this needs to be proportionate to promote social cohesion. The NPPF states that at least 10% of the affordable housing percentage should be discounted market housing or another form of "route to home ownership". That means that where a Council is proposing 15% affordable housing then the 10% falls entirely within that 15%. Thus, policy CS12 is contrary to paragraph 64 and footnote 29 of national Planning Policy in the NPPF because by having 60% of 15% as "affordable rent" tenure then there is not enough affordable housing left to be allocated as "routes to home ownership".</p> <p>The Council as LPA is asking that "at least 15%" affordable housing should be provided on major development sites. There is no justification or explanation as to why the term "at least" is engaged here. This is a huge "developer cost" so why is there no mandatory level of affordable housing in the Local Plan as there is in all other Local Plans in the entire region?</p>
Paragraph 8.113	<p>Where the Council wants to ... it is asking to deliver 100% affordable housing on its sites but it is not providing any clarity as to where these sites are. This approach is contrary to the government's objectives to provide mixed and balanced communities. Large scale affordable housing schemes are generally regarded as problematic in social and economic terms which is why development is normally promoted to have a</p>

Section/Chapter or Site reference:	Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)
	mix of tenures and types of homes to meet the requirements of the whole community.
IP150b Policy SP7	Site IP150b is allocated as a Sports Park but the Local Plan does not qualify or explain what this is. It is not a defined Use Class. The SA appears to suggest that this is just open green space that can sit comfortably with an adjacent Nature Reserve and nearby SPA but it may be that built development, traffic, parking, lighting, evening activities and noisy activities are involved. Plans should serve a clear purpose but none is set out in the Policy. If the plan is for predominantly open space as the SA suggests then a Sports Park should be in Policy SP6. Neighbouring residents are entitled to read the Local Plan and have certainty as to what is going to be permissible here. The site is valued as a green space and for its ecological and visual value in its current condition.
IP150c	The Land Adjacent to Nacton Road does not appear in the SA and the site sheet for site IP150e suggests that this site should be masterplanned with IP150c but there is no policy to insist upon it. There should be a criteria based policy stating how the site can be delivered as part of a masterplan.
IP150d	This should be described by the plan as "land south of Alnesbourn Crescent". There is no explanation or justification for this allocation which is an odd shape to be developed effectively particularly as a neighbouring development to a sports park. The plan is vague about this site. Again, if it is to be proposed then it should be part of a wider allocation with a credible justification. The site has serious nature conservation issues which would be incompatible with development. It is unclear as to how the Sports Park would be integrated with such a strange shape of development. It looks like a frontage development with a Sports Park to the rear is proposed. This would be not conducive to Designing Out Crime principles.
IP150e IP150d	The site here has reverted from an employment designation to housing without explanation. It is identified as being suited to 126 homes again expressed as an absolute minimum. The traffic impact of these homes is yet to be assessed and the plan is not certain about where access will be taken from. The SA says that this site is "excluding area fronting Nacton Road" and the Site Sheet Appendix says that the site should be planned comprehensively with IP152 and with "Improvements to the Nacton Road corridor" yet there is nothing to rule out piecemeal planning applications in the Local Plan. The SA states that the site is to be designed to include green infrastructure and that "existing green infrastructure of value should be preserved". The whole of site IP150e is good green infrastructure of excellent biodiversity value. The site along with IP150d and IP150b is visually and ecologically connected to the adjacent Nature Reserve. If the site is to be integrated with green infrastructure, it is quite clear that it cannot accommodate 126 homes. This represents a gross density of 35 dwellings per hectare which is higher than the net density of any nearby residential developments. If 126 is regarded as a minimum

Section/Chapter or Site reference:	Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)
	<p>capacity then, once infrastructure and green space is added, the net density would be up to 50 dwellings per hectare which would not be conducive to the suburban character of the remainder of the Ravenswood locality. Once again, there is vagueness in the plan about how this site is to come forward. If the site is to be allocated it must be considered comprehensively with other sites and must solve traffic and access issues by creating a new access on to Nacton Road without adding to air quality and congestion problems. The circa 1200 existing homes at Ravenswood are accessed via a single point of access and peak congestion / air quality here is already unacceptable and unsafe. <u>Without a comprehensive and cumulative assessment of the proposals on the basis of a MasterPlan which is part of Local Plan Policy, the Borough Council will be allowing piecemeal developments of conjoined sites which just exacerbate bad planning impacts on biodiversity, green space, traffic, noise and air quality.</u> A comprehensive proposal must be subject to EIA and cannot, in our view, resolve impacts including visitor pressure on the nearby SPA and Wildlife Site. These sites are referred to in the SHELAA as brownfield land. Clearly, they are green field sites.</p>

**PART B CONTINUED**

Section/Chapter or Site reference:	Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)
IP152	<p>This land is a very large area covering over 7 hectares. The plan hints that the site may allow the creation of a new access onto Nacton Road and that it might lead to improvements to the Nacton Road corridor. The detailed Site Sheet in the Appendix sets out a raft of constraints yet the site continues to be allocated for development. Alarmingly, the only guidance given to the development is that the industry should be as far from the A14 as possible meaning closer proximity to residential properties. The site has archaeological constraints along with ecology, surface water, noise and air quality issues which dictate that it should not be allocated. It is stated that issues should be resolved at the appropriate stage of the planning process. However, we are already at the appropriate stage and no work has been carried out to prove that this is a developable and accessible site without harmful impacts on the AONB, SPA and other important interests.</p>
IP141a	<p>The traffic impacts of this development must be assessed cumulatively along with the 24 hectares of development proposed at Ravenswood.</p>
IP149 Policy SP8 Paragraph 4.38	<p>The Extension to the Orwell Country Park is broadly welcomed but the plan is vague about how this is to be achieved. This extension does not resolve the very poor management of the existing Country Park. Motorcycles are routinely ridden on the foreshore and dogs running free are clearly incompatible with SPA objectives. The development of the 24 Hectares of land at Ravenswood adds to visitor pressures but without any proposals to minimise habitat impacts. Paragraph 4.38 of the plan is a ridiculous contradiction because the development at Ravenswood must not have an impact on the SPA yet the proposal seeks to "provide a better network of footpaths and view points over the estuary for visitors" while also discouraging "access to the foreshore". Existing residents of Ravenswood do not want to be penalised twice over by having access to the Orwell restricted while tolerating the huge impact of disproportionate and poorly planned additional growth which should be directed to adjacent districts. The Country Park continues to be accessible by unauthorised vehicles and suffers fly tipping and vandalism. The associated and adjoining wildlife sites also suffer vandalism with new planting being uprooted in spite of the very best efforts of the Local Wildlife Group. The cause of this is proximity with residential development and the solution lies with better management and greater distance to residential development pressure rather than dumping more development on the nearest land to the SPA.</p>

<b>Section/Chapter or Site reference:</b>	Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)
<b>Policy DM3</b>	The air quality policy would prevent development at Ravenswood because existing peak hour traffic is so great that this would be an Air Quality Management Area had the Borough Council conducted appropriate monitoring at the Nacton Road roundabout. The development at Ravenswood on all of the 6 development sites adds intolerably to air quality concerns without a solution in the Local Plan.

<b>Policy DM8</b>	The policy causes a conflict with the allocations policies because the allocations will have an adverse impact on European Protected sites. The huge housing and industrial development at Ravenswood could be located on an alternative site that would cause less harm to the SPA so Policy DM8 mandates that the Ravenswood development should be refused. The plan therefore unreasonably allocates land for development whilst including policies which would see that development rejected.
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Please ensure that Part B of your form is attached to Part A and return both to the Council's Planning Policy Team at [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk) or the postal address provided above by 11.45pm on Wednesday 13<sup>th</sup> March 2019

#### Privacy notice

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your contact details. Your comments and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address or telephone number. The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

We will hold this information for 5 years and will contact you again before this period expires to see if you wish to continue to take part in other planning consultations.

For further information about how we use your data please visit [www.ipswich.gov.uk/privacy](http://www.ipswich.gov.uk/privacy)



This submission is confirmed

[26338]

### Object Policy SP2 - Land Allocated for Housing

Respondent: Ravenswood Environmental Group (Mr Robert Eburne) [2469]

Received: 02/03/2020 via Web

Site IP150d is proposed for 34 homes but its contrived and unjustified shape demonstrates that it cannot accommodate 34 homes as frontage development. The site is of considerable ecological value and is used as Public Open Space. If it is to be developed then it should be masterplanned with other sites as part of one mixed use criteria based policy

**Changes to plan:** Delete site 150d

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To represent the views of a number of individuals

This submission is confirmed

[26339]

### Object Policy SP5 – Land Allocated for Employment Use

Respondent: Ravenswood Environmental Group (Mr Robert Eburne) [2469]

Received: 02/03/2020 via Web

The plan proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Masterplanning and EIA must be insisted upon.

**Changes to plan:** Rewrite the plan to provide a criteria based policy which only proposes development upon evidence that the impacts can be mitigated on a comprehensive basis

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To represent the views of a number of individuals

[26630]

Object Site Sheets, Site Ref: IP150c (Policy SP5) Land south of Ravenswood

Respondent: **Ravenswood Environmental Group (Mr Robert Eburne) [2469]**

Received: **02/03/2020 via Web**

The plan proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Masterplanning and EIA must be insisted upon

**Changes to plan:** Not specified

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:**

[26632]

Object Site Sheets, Site Ref: IP152 (Policy SP5 & SP9) Airport Farm Kennels, north of the A14

Respondent: **Ravenswood Environmental Group (Mr Robert Eburne) [2469]**

Received: **02/03/2020 via Web**

The plan proposes site IP152 and site IP150c for a total of 30,000 sqm of business and industry and sui generis uses. There is absolutely no justification for this significant development and no explanation of how it will relate to site IP150b and IP150e when traffic, air quality, noise, heritage and ecological constraints must be resolved comprehensively. The plan does nothing to justify or mitigate its impacts and does not insist upon a new major access to this development area. It merely implies that impacts need to be looked at. Masterplanning and EIA must be insisted upon

**Changes to plan:** Not specified

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:**

[26636]

**Object** Site Sheets, Site Ref: IP150b (Policy SP7) Land south of Ravenswood

Respondent: [Ravenswood Environmental Group \(Mr Robert Eburne\) \[2469\]](#)

Received: 02/03/2020 via Web

The Sports Park proposal is vague and unjustified. The plan does not explain what a sports park is or how the ecological impacts of its development would be mitigated.

**Changes to plan:** Delete sports park.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:**

[26637]

**Object Chapter 4 - The Duty to Co-Operate**

**has attachments** Has attachments

Respondent: **Ravenswood Environmental Group (Mr Robert Eburne) [2469]**

Received: **02/03/2020 via Web**

There is no cooperation between local authorities such as has happened around Cambridge or Norwich.

**Changes to plan:** Not specified

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Appearance at the examination

**Reason for appearance:**



**From:** BRYAN PATTERSON  
**Sent:** 04 February 2020 17:32  
**To:** PlanningPolicy  
**Cc:** Felicia Blake; Carlos Hone; Michael Hammond; Richard Venning  
**Subject:** Public Consultation for the Ipswich Local Plan Review Final Draft //15th Jan 2002 - 2nd March 2020  
**Attachments:** Local Plan Final Draft Comments.Jan-Mar 2020 Form CH (1).doc

Felicia HI !

**NOTE: ATTACHED RESPONSE**

Thank you for sending the required form which we have now completed and attach on behalf of the Ravenswood Residents Association.

Many thanks also to Carlos and Michael for answering some questions at the presentation at the Cliff Lane Primary School.

Best regards  
Bryan

Bryan Patterson  
Chairman  
Ravenswood Residents Association

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	
<b>Please return this comments form to:</b>	<p><u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or</p> <p><b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b></p>
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>

#### **PART A PERSONAL DETAILS**

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	Mr	
<b>First name</b>	Bryan	
<b>Last name</b>	Patterson	
<b>Job title (where relevant)</b>	Chairman	
<b>Organisation (where relevant)</b>	Ravenswood Residents Association	
<b>Address (Please include post code)</b>	:	
<b>E-mail</b>		
<b>Telephone No.</b>		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Ravenswood Residents Association								
<p>Please specify which document(s) and document part you are commenting upon.</p> <p>Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.</p> <table border="1"><thead><tr><th>Document(s) and document part.</th><th>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</th></tr></thead><tbody><tr><td>IP150e</td><td>(126 houses along Alnesbourne Crescent between the restaurants and The Prince George Care Home)</td></tr><tr><td>IP150d</td><td>(34 Houses along Alnesbourne Crescent between The Blue Bird Lodge Care Home and (Dunwich Close)</td></tr><tr><td>IP 150a (UVW)</td><td>(94 Houses on UVW site from earlier plan)  <b>TOTAL - 254 New Houses planned in total</b></td></tr></tbody></table> <hr/> <p><b>RECOMMENDATIONS</b></p> <ol style="list-style-type: none"><li>1) This equates to 254 houses and we would like to be kept fully informed on the plans which should fully reflect IBCs undertaking for 65.8% Private Housing and 34.2% Social Housing mix.</li><li>2) We would recommend an additional new access/egress point to Ravenswood to cope with the expected surge in traffic volumes, as we already experience heavy congestion problems at the current /2 roundabout access point – at the following times:<ul style="list-style-type: none"><li>- morning and evening rush hours</li><li>- school drop-off and pick-up times</li><li>- lunch times – restaurant traffic particularly the McDonalds queue which blocks the roundabouts and prevents traffic going to and emerging from the busy shopping mall, but also <b>IMPORTANTLY</b> any <b>EMERGENCY VEHICLES/Ambulances etc.</b>, entering or exiting the adjacent Hening Avenue and heading to or coming from the Ravenswood Medical Practice.</li></ul></li></ol>		Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)	IP150e	(126 houses along Alnesbourne Crescent between the restaurants and The Prince George Care Home)	IP150d	(34 Houses along Alnesbourne Crescent between The Blue Bird Lodge Care Home and (Dunwich Close)	IP 150a (UVW)	(94 Houses on UVW site from earlier plan)  <b>TOTAL - 254 New Houses planned in total</b>
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Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p><b>FURTHER COMMENTS to the first Consultation – 16 Jan – 13 Mar 2019</b></p> <p>Further to the recent Local Plan Presentation, we need to clarify some further issues with you:</p> <p><b>1) when the phrase - "no significant adverse effect on the local highway network" is used does the "highway network" Just refer to the Nacton Rd and the Thrasher roundabout etc or does it cover ALL local roads Including those on Ravenswood?</b></p> <p><b>2) Mr Carlos Hone's view seemed to be that any second access road could serve the new development ONLY. We believe that it should be designed to relieve the pressure for the whole of Ravenswood Including all of the additional 254 houses - 126 + 34 on Alnesbourne Crescent plus the 94 on the UVW plot at the back of the school. If the road only served area IP150e + IP150d and possibly any development on IP150c then it would not help address the central access problem.</b></p> <p><b>3) The upgrading of the private road to the golf course as you come off the A14 and heading to the Thrasher roundabout, is we believe the only possibility for the second point of access/egress into Ravenswood. The link then into our Ravenswood estate perhaps needs to be before the Blue Bird Lodge care home through IP150e, or after the Bluebird Lodge, and the new developments in IP150d and IP150b - which might need a trifle reconfiguration.</b></p> <p><b>4) We have gridlock now at several points during a normal working day with our one access point, but to cope with the new cars from 254 new houses, plus all of the preparatory work of builders lorries, bulldozers, and other construction machinery - something needs to planned in advance.</b></p> <p><b>5) There is also the question of additional pupils coming from the expanded estate - who would attend the Primary School - has this been factored in?</b></p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
IP150c	<p><b>IP150c - Is the Access to this B1 site for offices etc. to be via the new IP150e 126 housing development ? This would need to be master planned.</b></p>
IP152	<p><b>IP152 – This is designated for</b></p> <ul style="list-style-type: none"> <li>- <b>B1 (offices, R &amp; D, light industrial)</b></li> <li>- <b>B2 (general Industrial)</b></li> <li>- <b>B8 (storage/distribution)</b></li> <li>- <b>And as a SECONDARY USE</b></li> <li>- <b>Feasibility of a small section for Park &amp; Ride</b></li> </ul> <p><b>It is recognised that this development currently poses ACCESS constraints – which would also need to be master planned comprehensively with the aforementioned IP150e and IP150c mentioned above.</b></p>
IP150b	<p><b>IP150b SPORTS PARK - ACCESS to this Sports Park site will also need to be specified, as presumably access from Allesbourne Crescent would need to be made, it would appear, through the proposed new housing development on IP150d.</b></p>
IP152, IP150e, IP150c	<p><b>IP152, IP150e, IP150c These 3 phases need to be coordinated and Master Planned with a second ACCESS/EGRESS point for Ravenswood, as with the existing single point of access into and out of Ravenswood already not coping at the specified times of day, then forward planning becomes an absolute must, otherwise grid-lock will come into play very rapidly.</b></p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

**Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.**

### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

### **PRIVACY NOTICE**

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As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.



Tetlow King  
PLANNING

Unit 2 Eclipse Office Park High Street Staple Hill Bristol BS16 5EL

T: 0117 958 1916

E:

W: [www.tetlow-king.co.uk](http://www.tetlow-king.co.uk)

Planning Policy  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
IPSWICH  
IP1 2DE

Date: 2 March 2020

Our Ref: JR M15/0715-321

By email only:  
[PlanningPolicy@ipswich.gov.uk](mailto:PlanningPolicy@ipswich.gov.uk)

Dear Sir/Madam

**RE: IPSWICH LOCAL PLAN REVIEW: REGULATION 19 FINAL DRAFT**

Thank you for the opportunity to comment on the Regulation 19 Final Draft of the Ipswich Local Plan. We represent Rentplus UK Ltd, an innovative company providing affordable rent-to-buy housing for hard-working people aspiring to home ownership. Rentplus provides an accessible route to achieve their dream through the rent - save - own model. Households rent the property for a defined period at an affordable rent and then receive a gifted 10% deposit upon purchase. Rentplus has recently been recognised by the National Housing Awards as the Most Innovative Home Ownership Solution for 2019.

Rentplus has previously commented on the Local Plan at the Regulation 18 Preferred Options stage. Our previous representations set out the Rentplus model of affordable rent to buy in full. However, by way of summary, Rentplus is an affordable Rent to Buy product which can be delivered without requiring any public subsidy. Households rent the property from Rentplus' partner Registered Providers (RP) for a defined period of five, ten, fifteen or twenty years. During this time, households will benefit from security of tenure; management and maintenance from the partner RP; the ability to establish a good credit history (to assist with mortgage applications); and the opportunity to raise their own savings. At the end of the period of rent, households will have the option to purchase; Rentplus is unique in that they receive a gifted deposit equivalent to 10% of the market value of the property at that time.

**Comments on the Regulation 19 consultation**

Firstly, as a general observation, we are pleased to see that the Council has produced a 'Tracked Change' version of the Local Plan; this is very useful to participants in the consultation.

We are pleased to see that, as was previously set out at the Preferred Options stage, policies CS8 and CS12 and their supporting text refer to the up-to-date definitions of affordable housing, as set out in Annex 2 of the Framework. This ensures the Plan is consistent with national policy and is therefore sound in this regard.

We also welcome the amendments to policy CS8 'Housing Type and Tenure' which promote a more flexible approach to mix where evidenced by the SHMA and other evidence of local needs. These amendments will assist in delivering the widest mix of housing and therefore meeting the widest range of needs. However, for clarity and for consistency with the new fourth paragraph of policy CS8, the policy CS8 should be reworded slightly as follows: "*In considering the most appropriate mix of homes by size, and type and tenure for major residential proposals...*"

It remains the case that the SHMA 2019 does not refer to the full range of tenures set out in Annex 2 and we therefore continue to recommend that a focused update to the SHMA is prepared in order to inform policy and planning decisions. Any update to the SHMA should assess needs for products such as affordable rent to buy. In order to ensure the Plan is effective, the supporting text to policy CS12 should contain a new paragraph after paragraph 8.153 which commits to keep the SHMA up to date; this would also help in the application of policy CS8. A potential form of words is set out below:

*"In order to inform negotiation and decision taking and best meet the affordable housing needs of the Borough, the Council shall keep the Strategic Housing Market Assessment regularly updated. Any updates to the SHMA will contain up-to-date assessments of need for the full range of affordable housing tenures as defined in the National Planning Policy Framework. The Council will also consider other evidence of local needs where supported by the Council."*

#### **Summary**

We trust the above comments are of assistance to the Council. Should the Council wish to discuss how affordable housing delivery and rent-to-buy can best meet local needs in Ipswich Borough, please get in touch. We would like to be notified of further consultations; please notify Tetlow King Planning as agents of Rentplus by email only to [consultation@tetlow-king.co.uk](mailto:consultation@tetlow-king.co.uk).

Yours faithfully

**JAMIE ROBERTS MPlan MRTP**  
**PRINCIPAL PLANNER**  
For and On Behalf Of  
TETLOW KING PLANNING

[consultation@tetlow-king.co.uk](mailto:consultation@tetlow-king.co.uk)

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)



**IPSWICH  
BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Local Plan Review</b>
<b>Please return this comments form to:</b>	<b><u>planningpolicy@ipswich.gov.uk</u> or</b> <b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b>
<b>Return by:</b>	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
<b>This form has two parts:</b>	<b>Part A – Personal details</b> <b>Part B – Your comment(s).</b>

#### **PART A PERSONAL DETAILS**

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	-	<b>Mr</b>
<b>First name</b>	-	<b>Jamie</b>
<b>Last name</b>	-	<b>Roberts</b>
<b>Job title (<i>where relevant</i>)</b>	-	<b>Principal Planner</b>
<b>Organisation (<i>where relevant</i>)</b>	Rentplus UK Ltd	<b>Tetlow King Planning</b>
<b>Address (Please include post code)</b>	c/o Agent	<b>Unit 2, Eclipse Office Park High Street Staple Hill BRISTOL BS16 5EL</b>
<b>E-mail</b>	-	
<b>Telephone No.</b>	-	

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Tetlow King Planning on behalf of Rentplus UK Ltd
<p>Please specify which document(s) and document part you are commenting upon.</p> <p>Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.</p>	
Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Policies CS8 and CS12	We are pleased to see that, as was previously set out at the Preferred Options stage, policies CS8 and CS12 and their supporting text refer to the up-to-date definitions of affordable housing, as set out in Annex 2 of the Framework. This ensures the Plan is consistent with national policy and is therefore sound in this regard.
Policy CS8	We also welcome the amendments to policy CS8 'Housing Type and Tenure' which promote a more flexible approach to mix where evidenced by the SHMA and other evidence of local needs. These amendments will assist in delivering the widest mix of housing and therefore meeting the widest range of needs. However, for clarity and for consistency with the new fourth paragraph of policy CS8, the policy CS8 should be reworded slightly as follows: " <i>In considering the most appropriate mix of homes by size, and type and tenure for major residential proposals...</i> "
Paragraph 8.153	<p>It remains the case that the SHMA 2019 does not refer to the full range of tenures set out in Annex 2 and we therefore continue to recommend that a focused update to the SHMA is prepared in order to inform policy and planning decisions. Any update to the SHMA should assess needs for products such as affordable rent to buy. In order to ensure the Plan is effective, the supporting text to policy CS12 should contain a new paragraph after paragraph 8.153 which commits to keep the SHMA up to date; this would also help in the application of policy CS8. A potential form of words is set out below:</p> <p style="padding-left: 40px;"><i>"In order to inform negotiation and decision taking and best meet the affordable housing needs of the Borough, the Council shall keep the Strategic Housing Market Assessment regularly updated. Any updates to the SHMA will contain up-to-date assessments of need for the full range of affordable housing tenures as defined in the National Planning Policy Framework. The Council will also consider other evidence of local needs where supported by the Council."</i></p>

**Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.**

#### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

#### **PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

## **Felicia Blake**

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**From:** Jacky Robson  
**Sent:** 10 February 2020 16:35  
**To:** PlanningPolicy  
**Subject:** Ravenswood developments

Dear Sir or Madam

I would like to express my concern about the proposal to build over 120 more houses next to Alnesbourn Crescent in Ravenswood, on a site which was previously not designated as being for residential development.

My main concern is that this, in conjunction with the proposal to build houses next to the primary school in Downham Boulevard, will put intolerable pressure on the vehicular access in and out of Ravenswood. This is particularly aggravated by the amount of queuing traffic generated by Macdonalds drive through restaurant, situated near the only entrance/exit.

I am currently resident in Ravenswood and, apart from the traffic problems, the area seems to have been well-designed with good cycle paths, bus routes etc. I do hope that you will re-consider this decision, and look carefully at the idea of incorporating another entrance/exit to Ravenswood.

Yours faithfully

J E Robson

Sent from Mail for Windows 10

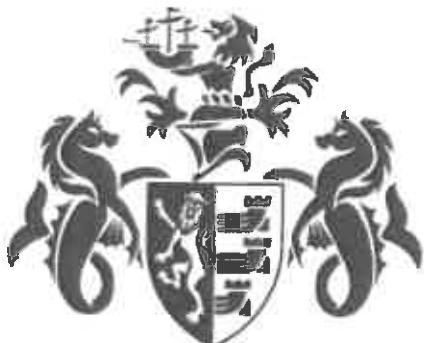
# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

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BOROUGH COUNCIL**

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Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<b>Core Strategy and Policies Development Plan Document Review Final Draft</b>
<b>Please return this comments form to:</b>	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  <b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b>
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#### PART A PERSONAL DETAILS

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
Title	Mr	
First name	Jamie	
Last name	Murphy	
Job title ( <i>where relevant</i> )	Conservation Officer	
Organisation ( <i>where relevant</i> )	RSPB	
Address (Please include post code)	RSPB Minsmere Sheepwash Lane Westleton Saxmundham Suffolk IP17 3BY	
E-mail		
Telephone No.		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation (*and client if you are an agent*):

Jamie Murphy, RSPB

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<b>Core Strategy and Policies Development Plan Document Review Final Draft</b>	<p>During the prior consultation on Ipswich Local Plan Review Preferred Options, the RSPB responded with comments on various policies and is very pleased to see that the majority of these have been taken into consideration. It also commends the explicit reference to take action to conserve and enhance swift populations in the Natural Environment Policy (DM8), Design and Character Policy (DM12) and Supplementary Planning Documents.</p>
<b>DM15 – Tall Buildings</b>	<p>There is however one notable omission from the Core Policies and Strategies Development Plan in relation to DM15 – Tall Buildings. A representation (24740) was made by the RSPB at the Issues and Options stage to include a further line in the policy, 'k) to incorporate integrated swift-bricks.' It is evident that this suggestion has not been taken forward and is seen as a missed opportunity.</p> <p>Such is the plight of swifts nationally (note that their breeding population has declined by 57% between 1995 and 2016 and they are consequently an Amber-listed species of conservation concern<sup>1</sup>), it is felt that failing to incorporate this basic measure could constitute a failure in the Borough Council's 'Duty to conserve biodiversity' under Section 40 of the Natural Environment and Rural Communities Act 2006, whereby a public authority 'must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity... which includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat.'</p> <p>Given that the cost of incorporating swift bricks in buildings is insignificant (c£20 per brick) and that the attitude of housing occupants towards them is very positive<sup>2</sup>, it does not seem that inclusion would affect the Borough Council's ability to exercise its functions and indeed would be consistent with the County Council's Suffolk Nature Strategy which states "swifts need suitable spaces in buildings to nest."</p> <p>Furthermore, this kind of inclusion is not unprecedented. The Hackney proposed submission local plan (Policy LP47D) asks that "all development proposals with an eaves height of 7 metres and above are required to provide</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>nesting boxes for swifts..."<sup>3</sup>.</p> <p>With this context in mind, the RSPB hope that Ipswich Borough Council will consider including this provision in its Local Plan to ensure the precedent is set for conserving biodiversity in its development management policies and demonstrate its continued commitment to swift conservation.</p> <p><sup>1</sup> <a href="https://www.bto.org/sites/default/files/shared_documents/publications/birds-conservation-concern/birds-of-conservation-concern-4-leaflet.pdf">https://www.bto.org/sites/default/files/shared_documents/publications/birds-conservation-concern/birds-of-conservation-concern-4-leaflet.pdf</a></p> <p><sup>2</sup> <a href="https://actionforswifts.blogspot.com/2018/06/the-attitudes-of-housing-occupants-to.html">https://actionforswifts.blogspot.com/2018/06/the-attitudes-of-housing-occupants-to.html</a></p> <p><sup>3</sup> <a href="https://hackney.gov.uk/lp33">https://hackney.gov.uk/lp33</a></p>

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

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This submission is **confirmed**

[\[26232\]](#)

Object Site Sheets, Site Ref: ISPA 4.1 (Policy SP2 & ISPA4) Northern End of Humber Doucy Lane

Respondent: [Rushmere St Andrew Parish Council \(Sylvia Stannard, Parish Clerk\) \[2422\]](#)

Received: **24/02/2020 via Web**

Rushmere St Andrew Parish Council objects to the inclusion of land at the northern end of Humber Doucy Lane adjacent to Tuddenham Road. This allocation will significantly increase traffic on the Woodbridge to Claydon corridor via Playford Road, Rushmere Street and Humber Doucy Lane. This development should not take place until significant improvements to roads and travel has been made.

**Changes to plan:** Delete the policy

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Written Representation

This submission is **confirmed**

[26233]

### Object Policy ISPA4 Cross Boundary Working to Deliver Sites

Respondent: **Rushmere St Andrew Parish Council (Sylvia Stannard, Parish Clerk) [2422]**

Received: **24/02/2020 via Web**

Rushmere St Andrew Parish Council objects to the inclusion of Policy ISPA 4.1. This allocation will significantly increase traffic on the Woodbridge to Claydon corridor via Playford Road, Rushmere Street and Humber Doucy Lane. This development should not take place until significant improvements to roads and travel has been made. The Cross Working Policy refers to upgrading of road junctions but this does not address the concerns of the parish. More should be done to improve local roads and travel and it should be specified that improvements should be implemented prior to development.

**Changes to plan:** Delete Policy ISPA 4.1 and this policy.

Document is not legal

Document is not sound

Document does not comply with duty to cooperate

**Representation at examination:** Written Representation

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**S**





# Save Our Country Spaces SOCS - Comments on the Ipswich Borough Council CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW- FINAL DRAFT January 2020 - Consultation Ending 2<sup>nd</sup> March 2020

The following issues need to be fully assessed & adequately addressed in order for the core strategy review to be 'sound'. SOCS suggest the plan is unsound and does not comply with the national planning policy framework (NPPF). **SOCS wish to give oral evidence at inquiry.**

The "Climate Change" agenda is insufficiently addressed. Proposals are **contrary to;**  
**NPPF 10. Meeting the challenge of climate change, flooding and coastal change.**

It appears that environmental, social and economic effects of the plan(s) are inadequately and inaccurately assessed against Habitats Regulations Assessments and the Sustainability Appraisals (SAs)

"Serious adverse effects" have not been properly identified, as required under compliance with the NPPF (**Achieving Sustainable Development NPPF 6-17**) for either the CS or development and control purposes. This situation is likely to render any planning application almost impossible to determine properly and therefore, we say, render the major IGS planning applications problematic. It also potentially renders stakeholder responses to planning applications a problem.

**NPPF-11 Conserving and enhancing the natural environment** is not adequately taken into account.

## TAKING FULL ACCOUNT OF CUMULATIVE AND COMPOUND EFFECTS

The SEA Directive requires that the assessment include identification of cumulative and synergistic effects including those produced by other neighbouring local authorities. The SA does not appear to take account of the cumulative effect of CSs Plans of neighbouring authorities with regard to housing, employment and especially transport/traffic and increased air pollution and traffic congestion.

## THE FOLLOWING SPECIFIC ISSUES NEED TO BE FULLY ASSESSED & ADEQUATELY ADDRESSED IN ORDER FOR THE CORE STRATEGY REVIEW TO BE 'SOUND'.

Growth, must be measured against the potential for serious adverse effects and serious adverse impacts, which included adverse impacts on the Quality of Life and Public Health.

The potential to secure a "sustainable future" for the existing local population, future populations and future generations is an imperative not demonstrated by the plan(s).

- |  |
|--|
| 1. <b>DRAINAGE</b> , Surface Water Drainage ; APPEARS NON-COMPLIANT and may not work.                |
| 2. <b>FLOODING LIKELIHOOD</b> may increase at Westerfield.   |
| 3. <b>SEWAGE PROPOSALS INADEQUATE</b> & likely to add to existing problems                           |
| 4. <b>TRAFFIC PROPOSALS AND ADVERSE IMPACTS ON EXISTING RESIDENTS-</b> no solutions                  |
| 5. <b>AIR POLLUTION</b> and impact on our children's health inadequate Air Pollution Action Planning |
| 6. <b>ADVERSE PRESSURES ON HOSPITALS, SCHOOLS &amp; ACCESS TO GPs and SOCIAL CARE</b>                |
| 7. <b>ADVERSE EFFECTS OF ROAD WIDENING</b> and <b>REMOVAL OF TREES &amp; VERGES</b>                  |
| 8. <b>LOSS OF HIGH GRADE LOCAL FOOD GROWING LAND</b>   |
| 9. <b>REMOVAL OF TREES, HEDGEROWS, HABITATS</b>  |
| 10. <b>COUNTRY PARK – DELIVERY</b> May be delayed or stalled.  |
| 11. <b>Where is the NEED FOR THESE houses and flats bearing in mind the LACK OF NEW LOCAL JOBS</b>   |

SOCS have liaised with North Fringe Protection Group (NFPG) who have kindly allowed us to incorporate most of their draft text with a few minor amendments which reflect SOCS differing views, mainly on the need for a major Northern Road Route for Ipswich.

SOCS have actively supported the Stop! Campaign and will be involved in the new Start! campaign to secure safely, more environmentally friendly sustainable transport solutions and Keep Ipswich Moving.

NPPG state, 'Please find our representation on the above, which should be considered in conjunction with our representations on the associated revised Site Allocations & Policies. We want to see a sound evidence-based Core Strategy (CS) in place which will help make Ipswich a more attractive place to live and work. We have made our comments on the CS (which we also reference as the Plan) sequentially although these will relate to the same issue in different sections of the CS. Rather than keep repeating our comments, IBC should assume that our comments on each issue apply throughout the CS to that issue, wherever the issue is mentioned in the CS.'

Since SOCS have been involved with the Local Plan for Ipswich, they have baulked at the unrealistic and unjustified housing and job targets set. They have challenged population projections which have driven this agenda. It is good to see at last that the legacy of growth, expansion, over ambition and wishful thinking of the early 2000's finally are being challenged. However, there is a way to go to achieve a sound plan.

The Duty to Cooperate is hard for Ipswich to achieve when partner organisations are reluctant to take ownership and responsibility for the adverse impacts they are imposing on the County Town. Ipswich Borough has many responsibilities but little power and control and limited capacity for resolution.

### **Summary of key issues**

SOCS concerns with the IBC CS are in relation to 10 of the 12 strategic objectives and we question the legality, Sustainability and Soundness of this review plan.

Highly material is the decision and judgment released this week from The Supreme Court on Climate Change and development- (Heathrow)<sup>1</sup>. This needs referencing and being taken into account within Local Plans as it is a fundamental game changer with respect to Local Plans, Strategic Planning and Local Development Control and Planning Committee decision making.

**This new case law could make Local Plans, where Paris Agreement on climate change, (concluded in December 2015 and ratified by the United Kingdom in November 2016) isn't adequately taken into account or doesn't demonstrate conformity to within Strategic Environmental Assessment and the Habitat's Directorate requirements, challengeable and potentially unlawful.**

Extracts from the Judgment:

#### **R (FRIENDS OF THE EARTH) v SECRETARY OF STATE FOR TRANSPORT AND OTHERS 27th February 2020 Lord Justice Lindblom, Lord Justice Singh and Lord Justice Haddon-Cave SUMMARY OF JUDGMENTS**

8. To a substantial extent, for the reasons we have set out, we agree with the analysis and conclusions of the Divisional Court. Like the Divisional Court, we have concluded that the challenges to the ANPS must fail on the issues relating to the operation of the Habitats Directive, and also on all but one of the issues concerning the operation of the Strategic Environmental Assessment Directive (paragraph 283).

9. However, we have concluded that the challenges should succeed in one important respect. This relates to the legislative provisions concerning the Government's policy and commitments on climate change, in particular the provision in section 5(8) of the Planning Act, which requires that the reasons for the policy set out in the ANPS "must ... include an explanation of how the policy set out in the statement takes account of Government policy relating to the mitigation of, and adaptation to, climate change". We have concluded, in particular, that the designation of the ANPS was unlawful by reason of a failure to take into account the Government's commitment to the provisions of the Paris Agreement on climate change, concluded in December 2015 and ratified by the United Kingdom in November 2016 (paragraphs 222 to 238 and 242 to 261).

1 <https://www.judiciary.uk/wp-content/uploads/2020/02/Heathrow-summary-of-judgments-26-February-2020-online-version.pdf>

10. We have concluded that the ANPS was not produced as the law requires, and indeed as Parliament has expressly provided. The statutory regime for the formulation of a national policy statement, which Parliament put in place in the Planning Act, was not fully complied with. The Paris Agreement ought to have been taken into account by the Secretary of State in the preparation of the ANPS and an explanation given as to how it was taken into account, but it was not (paragraph 283).

11. That, in our view, is legally fatal to the ANPS in its present form.

SOCS understand the purpose of this review is to update the Core Strategy until 2036 taking into account all new legislation and National Planning Policy Framework Updates and to align the Local Plan with East Suffolk and Mid Suffolk Babergh.

However, it should be noted that East Suffolk is tasked with making modifications to their plan which was under inspection last year.<sup>2</sup>

SOCS were very critical of the 'Statement of Common Ground' issued last year and submitted a response to the emerging Mid Suffolk Local Plan Consultation in addition to one for Suffolk Coastal District Council. SOCS attended and gave oral evidence to the East Suffolk Plan Inquiry in public.<sup>3</sup> Save Out Country Spaces feel the Duty to Cooperate has not been has not been effectively achieved within this Draft; nor has it by the partner local authorities.

SOCS believe there is a lack of realistic accounting for the adopted policy on Climate Emergency and the Climate Change agenda, for 10 of the 12 strategic objectives, outlined within the CS, mainly in relation to the following; traffic related issues, including delivering the required infrastructure and modal shift and the associated impact on air quality; climate emergency and climate change precipitated flood risk, loss of grade 2 farm land, loss of vital green rim and urban/rural separation with its attendant adverse impacts on the network of wildlife links with green corridors, especially to the County Wildlife site area of the Fynn Valley.

The Tuddenham Road/Westerfield green corridors with attendant links to a network of green intersecting routes and the green rim are home to a significant number of recorded protected species. (Suffolk Biological Recording office.) We have evidence of great crested newts, badgers, hedgehogs bats and all manner of species -hares which are under threat as well as birds, flora and fauna; Southern Marsh and bee orchids are found on the Fynn Valley and adjacent area.

Due to much of the land being in private farming ownership, there has been little interest or appetite for any formal survey and recording to be done of this important area, as it does not best serve the landowners aspirations for the land use and development for housing e.t.c.

Suffolk Wildlife Trust have done some work within Red House Ipswich (desk top survey), the Fynn Valley County Wildlife Site in East Suffolk; a Hedgerow Survey of the whole IGS area done to Suffolk Hedgerow Survey methodology was completed by Dr Douglas Seaton<sup>4</sup> with direction from Guy Acres. Active badger sets have recently been reported to the County Recorder as well.

Regarding the CS proposal to incorporate sites along Humber Doucy Lane as an 'extension' of the IGS sites, the following statements by SOCS and quotes by elected member and portfolio holder Carol Jones, needs to be remembered and applied to THE DISTRIBUTION OF DEVELOPMENT - Ipswich Garden Suburb, the Northern End of Humber Doucy Lane.

2 [https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk\\_Coastal\\_Local\\_Plan\\_Post\\_hearings\\_letter.pdf](https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk_Coastal_Local_Plan_Post_hearings_letter.pdf) <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

3 a) Hearing Day 1: Tuesday 20 August (Week 1) Morning – 09:30 b) Sustainability appraisal c) Habitats Regulations Assessment f) Climate Change

4 Dr Douglas Seaton

*"Adverse impacts and significant disruption will undoubtedly occur in both the short and long term on existing residents' Quality of Life and Well being"; a point conceded by the Portfolio holder within Executive paper E/13/601;*

*" 2.2 The development of the Northern Fringe involves major challenges due to its large-scale, multiple ownership, the need to incorporate a wide range of supporting infrastructure and the mitigation of impacts on local communities."*

**SOCS believe therefore policy ISPA4 Cross Boundary Working to Deliver Sites is unjustified and unsound.**

SOCS outlined concerns about sustainability and flood risk in the last Local Plan consultation with respect of proposals for the distribution of development,

*'Red House has the highest potential for flooding; a ground level water table which hydrological assessment might suggest renders the site unviable if the mitigation required for flooding and biological site features, TPOs, hedges and ditches as unviable and proposals as they stand, cannot be either practically or economically achievable.'*

Mapping of the known flood risk (2013) in THE DISTRIBUTION OF DEVELOPMENT - Ipswich Garden Suburb, the Northern End of Humber Doucy Lane.



<https://democracy.ipswich.gov.uk/documents/s20700/Item%2002.pdf>  
An outline planning application Land off Tuddenham Road

*5.108 As the construction phase progresses the surface water runoff rates and volumes are considered to increase as more impermeable surfaces are created and vegetation removed. A surface water drainage system including sub-surface sewers, porous paving, swales, basins, ponds and wetland will serve the development and be operational for its lifetime.*

*5.109 The impact on surface water flood risk would be low, increasing to high as construction begins. Without mitigation water quality impact is considered to be medium increasing to high as construction progresses. Mitigation would be achieved through the phasing of the SuDS and the use of a CEMP to minimise the pollutants created.*



Land off Tuddenham Road by Humpback Bridge overlooking IGS displaying serious Ground Water flooding<sup>5</sup> February 2020 as outlined in Revised Suffolk Flood Risk Management Strategy Appendix 1.

The proposed extension of the IGS to the Humber Doucy Lane area would be subject to the same constraints. The ecological network, green corridor and green trail approach to strategic green infrastructure (policy CS16) we regard as unsound.

Further concerns include the lack of funding to deliver the required improvements to air quality, flood risk vulnerability and biodiversity and habitat loss.

With regard to the IGS, (and policy area ISPA4 possibly) future households will have to bear the costs of management and maintenance; maintenance charges/levy will apply to all new houses in the northern fringe. new residents to pay, in perpetuity, for drainage systems upkeep and other infrastructure ongoing costs.

This draft of the CS lacks clarity in respect of flooding risk.

In March 2016, SCC Portfolio holder Matthew Hicks confessed,

*"I recognise that, in the past, the different organisations involved have not always worked together effectively enough in managing flooding. It is vital that we all work better not just with each other but crucially with the public."*

Ipswich no longer have their own dedicated drainage engineering department which places them at a disadvantage to fight their corner.

In regard to sustainability, there should be a reference to the work of the **Food and Farming Commission<sup>6</sup>** and to the issue of sustainable land use.

5 [https://democracy.westsuffolk.gov.uk/documents/s14075/CAB.SE.16.021 Revised Suffolk Flood Risk Management Strategy Appendix 1.pdf](https://democracy.westsuffolk.gov.uk/documents/s14075/CAB.SE.16.021%20Revised%20Suffolk%20Flood%20Risk%20Management%20Strategy%20Appendix%201.pdf)

6 [links to the report issued in July https://www.thersa.org/action-and-research/rsa-projects/public-services-and-communities-folder/food-farming-and-countryside-commission](https://www.thersa.org/action-and-research/rsa-projects/public-services-and-communities-folder/food-farming-and-countryside-commission) before the (then) Secretary of State for the Environment, Michael Gove MP.

*"Nowhere do conflicts in food, farming and the countryside show up more than in discussions about how we use our land and who decides. Debates have become polarised and it is the ground on which the battles for the future of farming and the countryside are being fought.*

*Only 8 percent of rural homes are affordable, compared to 20 percent in urban areas; weekly transport costs average £132 in rural areas compared to £71 in urban areas.*

*We recommend:*

- *Establishing a national land use framework in England that inspires cooperation based on the public value of land, mediating and encouraging multipurpose uses*
- *Investing in the skills and rural infrastructure to underpin the rural economy*
- *Creating more good work in the regenerative economy*
- *Developing sustainable solutions to meet rural housing need*
- *Establishing a National Nature Service that employs the energy of young people to kickstart the regenerative economy "*

## **IBC 12 strategic objectives**

### **1. STRATEGIC WORKING – SOCS suggest inadequately demonstrated.**

#### **2. GROWTH .....'with 31% at the Ipswich Garden Suburb and 15% in the remainder of the Borough being affordable homes'**

SOCS understand that IBC has negotiated and allowed for 4% and 5% affordable homes for the outline planning consent on the IGS?

b) 'approximately 9,500 additional jobs shall be provided in Ipswich to support growth in the Ipswich Strategic Planning Area between 2018 and 2036.'

26 February 2020 Insurance giant to close Ipswich office axing 300 jobs/Anglian Water is cutting 200 jobs across all areas of the business. SOCS have repeatedly challenged the unrealistic job targets and numbers lacking credibility.

#### **3. THE DISTRIBUTION OF DEVELOPMENT - The development of the Borough should be focused primarily within the central Ipswich 'IP-One' area, Ipswich Garden Suburb, the Northern End of Humber Doucy Lane and within and adjacent to identified district centres (these areas are identified on the key diagram).**

SOCS, like NFPG, believe there is a demonstrated lack of justification for the area around Humber Doucy Lane to form part of the plan.

### **5. AIR QUALITY (Noise pollution)**

SOCS comment - 2013-Traffic Survey Work by developers

*'Consideration of the noise, vibration and traffic noise impacts from the hump back road/rail bridge elevation, separately and in combination, from both rail and road on the proposals and mitigation measures likely from the these impacts, should include an assessment for intensification over the plan period especially as Felixstowe Port is due for expansion with increased use of the Rail line planned. Environmental Impact Studies, which may be currently being commissioned, will need very careful independent scrutiny.'*

7 <https://www.planningresource.co.uk/article/1461192/go-ahead-2000-homes-ipswich-garden-suburb-despite-affordable-housing-shortfall> Considering the revised application, officers noted "significant costs" in providing infrastructure to enable delivery of the site and "recognised that the viability position has got worse" since the agreement was negotiated. They concluded: "The provision of 15 per cent affordable housing and all of the s106 obligation would make the scheme unviable." The newly agreed s106 package amounts to around £14.75m, they said. For the Crest Nicholson scheme, the council agreed to an affordable housing level of five per cent and agreed to four per cent for the Mersea Homes scheme.

*Red House Site, has a minimal green buffer next to the railway. Added to this is the Railway is partly elevated and already causes significant noise nuisance problems currently by the generating of significant noise from freight through the night. Upgrades and increased use of the line due to Felixstowe Port expansion needs assessing in relation to the Draft SPD proposals for Red House, particularly in relation to the very highest densities which have been proposed."*

We now have the 5 point Rail Plan agreed 2018, with Network Rail and NO assessment of pollution from diesel trains currently in use.

**Current rail noise levels have given rise to residents complaints and can be heard for a distance of about 1/4-1/2 a mile at night causing significant sleep disturbance especially in summer.**

## **6. TRANSPORT AND CONNECTIVITY**

## **9. NATURAL ENVIRONMENT**

**10. COMMUNITY FACILITIES AND INFRASTRUCTURE** – The current situation in the Health Service is worrying -with access to services GPs and the possibility of flu pandemic. Ipswich no longer have a dedicated Drainage Engineering department and team, so have no internal independent expertise to call on for Flood matters and drainage.



Comments within the following text

For ease of reference we provide a summary of our key concerns which show that the CS is not sound without modifications to these areas.

### **Transport and improving accessibility**

1. Previous modelling has shown that many junctions and link roads in Ipswich are already at/near capacity, but this is not addressed in the CS. There is no evidence that proposed growth in the CS is sound in relation to transport proposals in the years up to 2026.
2. Transport modelling shows severe capacity issues in 2026 at many key junctions in and around Ipswich that will result in gridlock but there are no transport infrastructure projects included in the Infrastructure Tables to resolve these capacity constraints. This is especially the case in and around the town centre, Ipswich Garden Suburb and the A1214.
3. The Transport modelling fails to identify when these Ipswich junctions will reach capacity (evidence shows that some already have) and consequently the CS fails to adequately plan for this.
4. IBC is failing to Improve Access in Ipswich in breach of CS5. More needs to be done otherwise the Modal Switch assumptions used in the traffic modelling are too high and unsound resulting in non-compliance with CS20 Transport. The CS is not justified with respect to Improving Access and Transport.
5. The Committee on Climate Change assumes that there will be a 10% transport modal shift by 2050. Where is the evidence that IBC can deliver around 15% modal shift by 2026 ? - a ridiculously short timeframe for such a high target. Unless IBC can provide evidence that it can achieve higher levels of modal shift than the CCC thinks feasible, the CCC assumption should be used in the modelling work for the CS to be sound.
6. Evidence shows that the existing walking and cycling infrastructure in Ipswich is clearly sub-standard and will not enable delivery of the levels of modal shift required without substantial improvements.
7. There is no funding allocated during the four-year period in IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS<sup>8</sup> to encourage modal shift, for example to change behaviours and improve cycling and pedestrian infrastructure.

<sup>8</sup> <https://democracy.ipswich.gov.uk/documents/s27023/C-19-19%20MTFP%20Appendix%201%20-%20Financial%20Strategies%20and%20Medium%20Term%20Financial%20Plan%202020-21%20Onwards.pdf>

8. The CS is not justified as it does not take account of proportionate evidence, especially in relation to modal shift assumptions. The New Evidence database is incomplete as it excludes several key Transport documents, especially those in relation to modal shift and the S106 schedules for the approved Ipswich Garden suburb developments which have not been made available to the Public in time to examine as part of this Consultation.
9. We are concerned that the two road bridges (and country park) may not be delivered in time (February 2022) to receive the £9.8m Housing Infrastructure Funding. If this is the case, then the CS is unsound unless IBC can confirm alternative funding will be available.
10. We are concerned that the CS is not completely positively prepared as it fails to fully assess transport infrastructure requirements, including walking and cycling infrastructure, especially in relation to timing of delivery (and as sewage infrastructure requirements).

## Air Quality and the environment

11. The CS is not consistent with national air quality policy as it fails to ensure compliance with legally binding limits. There needs to be a requirement to comply with these for the CS to be sound.
12. The CS needs to strengthen the commitment to Improve Air Quality as there has been no real improvement in Air Quality in Ipswich over the past decade with the number of AQMAs in Ipswich increasing.
13. There is no funding allocated during the 4-year period in IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS for improving air quality.
14. There is no Air Quality Assessment provided as part of this consultation. This needs to be completed urgently and needs to include assessments for the early years of planned developments, all construction-related traffic (including sewage infrastructure projects) and rail/sea traffic. It needs to examine the impacts of different levels of modal shift rather than assume the unsubstantiated, extremely high levels of modal shift assumed in the transport assessment will be delivered by 2026 and thereafter.
15. There is little point in undertaking an Air Quality Assessment in 2036 as the ban on non-electric vehicles will have been implemented. It is the early years of the CS where air quality is most likely to be worst. We believe that an earlier assessment than 2026 is therefore required e.g. 2023 and perhaps 2029/30 (prior to the ban on non-electric vehicles) rather than 2036 when there will be a significant number of electric vehicles.
16. At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency. The CS needs to be updated to incorporate this to be sound.
17. We strongly object to the re-designation of the Ipswich "green rim" to "green trails". This is in breach of DM13 and unsound.
18. The current situation regarding flood risk assessment within the CS is ambiguous and somewhat confused. This needs to be clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be sound and understood by residents.(The following is a better map to illustrate risks.)
19. A key problem with the Sustainability Appraisal, Habitats Assessment and Health Impact Assessment are that they simply assume that the CS will be fully implemented and that full funding for all the measures identified in the CS will be secured. There is no evidence that IBC (in conjunction with SCC) can deliver the substantial improvements in walking, cycling and bus infrastructure, improved road infrastructure and the unprecedented levels of modal shift required for the CS to be sound. IBC and SCC's track record in these areas is dire - what evidence is there that this will change?
20. The Sustainability Assessment is incomplete and underplays many key issues. It needs to fully assess air quality impacts including from rail and sea, the impacts of the additional road infrastructure required to prevent junctions reaching capacity , the proposed re-designation of the Green Rim, alternatives to building on Humber Doucy Lane (and that Suffolk Coastal no longer needs this land to meet its housing target), flood risk and the impacts of the new sewage infrastructure that will be required to deliver the CS. It especially needs to assess the robustness of the CS if the unprecedented levels of modal shift are not achieved.

21. The same issues relating to the Sustainability Appraisal apply to the Health Impact Assessment.

22. The Habitats Assessment also needs to take account of the same issues.

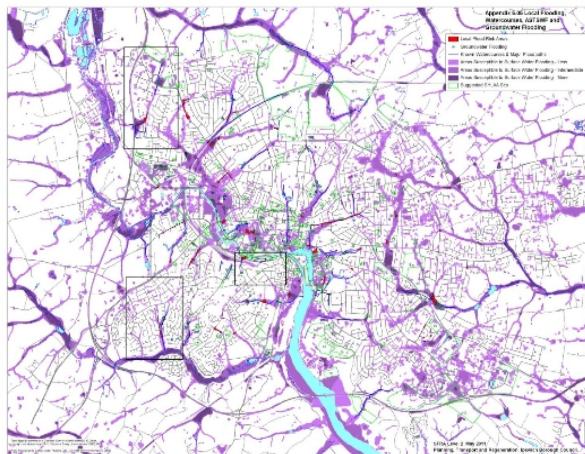
## 9 MAPS

Surface water & ground water flooding maps are followed by tidal & fluvial maps.  
Use "zoom in" to view more detail or download SFRA documents where links are provided.

AO or A1 paper copies can be supplied on request (there will be a charge).

### 9.1 SW Flood Map

This shows the EA's map "Areas Susceptible to SW Flooding" (ASTWF) together with IBC's historic local flood map (in red) which also shows approximate locations of reported ground water flooding, watercourses and major flood paths.



ASTWF may be subject to refinement by FRA's. The SWMP has already refined the ASTWF map in the 4 locations indicated by the rectangular boxes – maps for parts of these areas follow.

Assumptions made in producing the ASTWF map are described in the EA's document.

<http://www.environment-agency.gov.uk/research/planning/129324.aspx>

## Other

23. There are still no firm proposals for new sewage infrastructure that is required for the IGS and the wider Ipswich area, which need to be consulted upon and included in the Infrastructure Tables.

24. The proposal to allow development in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road is not justified and therefore unsound. Land in the centre of Ipswich earmarked for expanded retail and car parking (which we believe is surplus to requirements), should be used for new homes instead. There is no SA of this viable alternative.

25. The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector<sup>9</sup> from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756). Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) it had included in its final draft plan<sup>10</sup> (paragraph 12.209). The SA fails to assess this and is unsound.

9 □

[https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk\\_Coastal\\_Local\\_Plan\\_Post\\_hearings\\_letter.pdf](https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk_Coastal_Local_Plan_Post_hearings_letter.pdf)

10 <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

**26.** Specific Objectives are required to ensure delivery of key aspects of the CS such as improving transport infrastructure, improving air quality, delivering modal shift and improving accessibility are required. These need to be monitored and reported on to ensure the CS is effective.

### **Consultation Statement Ipswich Borough Council Local Plan Review Preferred Options** **January - March 2019**

We are concerned that our comments on CS5 and CS20 in relation to the transport modelling and modal shift (and associated air quality issues) have not been adequately considered. IBC appears to be adopting the approach that SCC's Transport Mitigation Strategy for the Ipswich Strategic Policy Area (IPSA)<sup>11</sup> will totally resolve all the traffic issues and fully deliver the required levels of modal shift for the CS to be sound, without substantiating this with any evidence that it will. Until such evidence is provided the CS cannot be considered effective or justified. It is particularly disappointing that the Transport Mitigation Strategy and other relevant modal shift documents have not been included in the Evidence Base. We agree that extremely high modal shift levels will be needed but believe that the new infrastructure required is substantially underestimated as is the difficulty in achieving the unprecedented levels of modal shift necessary for the CS to be sound. The level of funding needed to deliver this is massively under-estimated. There is also a significant shortfall in guaranteed funding for the insufficient measures identified in the Plan. IBC has yet to respond to these concerns.

#### **Para 5.25**

Improving air quality in the increasing number of Ipswich AQMAs (now five) needs to be added as a key challenge as IBC is legally required to reduce pollution levels to legally binding limits and has failed to do so; there have been no material improvements to air quality and IBC is non-compliant with its CS in this respect. The planned growth levels for Ipswich will further challenge this requirement.

Given the high levels of modal shift required, IBC should be "delivering high levels of modal shift" rather than just "guiding as many trips as possible to sustainable modes". The current draft under-estimates the difficulty and importance of the task.

Meeting the Climate Emergency also needs to be added as a key challenge as Ipswich Borough Council has committed to tackling this issue. Not to include it would be unsound.

**Para 5.26 Table 2** – for ease of reference we have included all our comments on flood risk below, but these should be considered for all other references of flood risk in the CS

This states that "*In addition, as part of the final draft Local Plan, a refresh is being prepared of the Ipswich Strategic Flood Risk Assessment (SFRA).*" Paragraph 6.1.6 then states that "*The Council's Level 2 Strategic Flood Risk Assessment (SFRA) was revised in 2019. It provides guidance on residual flood risk both for the situation before and after completion of the flood barrier. The SFRA also suggests a framework for safe development. The safety framework is detailed in the Council's Development and Flood Risk SPD (September 2013) which is in the process of being updated*". It is not clear which Safety Framework applies to the CS.

However, the IBC FRA webpage<sup>12</sup> only references the 2011 SFRA version and does not show the 2019 version referenced above. We also note that the Local Plan New Evidence database includes a draft 2020 SFRA as well. It is not clear when or if this has been adopted. The IBC website also states that

<sup>11</sup> <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/ISPA-Transport-Mitigation-v13F.pdf>

<sup>12</sup> <https://www.ipswich.gov.uk/content/strategic-flood-risk-assessment-sfra>

the Flood Risk SPD “was first updated in May 2014 and has subsequently been updated in January 2016 to reflect changes to national and local policy and guidance<sup>13</sup>.”

Paragraph 8.45 states “On flood risk, it concludes that an updated Strategic Flood Risk Assessment is needed to model the boundaries of Flood Zones 3a and b; drainage strategies should be prepared for all sites; and the sequential and exception tests need to be applied to all sites in flood zones 2 and 3.” It is not clear if the draft 2020 SFRA meets this requirement. The paragraph then goes onto state that “Further guidance is contained in the Development and Flood Risk Supplementary Planning Document 2016”. It is not clear whether the 2016 SPD adequately reflects the draft 2020 SFRA.

Paragraph 8.46 states that “the Ipswich Surface Water Management Plan<sup>14</sup> was produced in [June] 2012 and is currently under review”. This is clearly obsolete and fails to take account of climate change. Under the NPPF hierarchy for managing flood risk, this is the key document/means of controlling flood risk. This review needs to be completed urgently and incorporated into the CS for it to be sound.

Paragraph 8.225 states that “Part C of this document includes policies relating to flooding to reflect the NPPF and the detailed findings of the Ipswich Strategic Flood Risk Assessment”. But it does not reference which SFRA version it relates to. IBC needs to confirm that this is compliant with the draft SFRA 2020

Policy DM4 states that “it [development] will be adequately protected from flooding in accordance with adopted standards of the Suffolk Flood Risk Management Strategy<sup>15</sup>;” However, the document was produced in 2016 so doesn’t include the full risk of flooding from climate change so there is no assurance that development will be adequately protected.

Suffolk County Council’s Preliminary Flood Risk Assessment (PFRA) was published in 2011<sup>16</sup> and had a 3 page addendum<sup>17</sup> in 2017. A Preliminary Flood Risk Assessment (PFRA) is an assessment of floods that have taken place in the past and floods that could take place in the future. It considers flooding from surface water runoff, groundwater and ordinary watercourses. This is also therefore out of date and will not fully take account of climate change. We believe an update is required to ensure the CS is sound.

In the 2017 Addendum, SCC used a national data set to predict flood risk but these do not include climate change allowance output, so SCC have projected the potential number of properties at risk for the 0.5% AEP for the PFRA. The results show that Ipswich is the area at greatest flood risk and has been identified as a Flood risk area (FRA) for the purposes of the Flood Risk Regulations (2009) second planning cycle. The Addendum states that “To improve SCC understanding of climate change in priority areas, local modelling updates will assess the impact of climate change.” It is not clear whether this modelling has been done or how it has been included in the CS. Clearly this needs to be incorporated into the CS for the CS to be sound.

The current situation regarding flood risk assessment within the CS is ambiguous and confusing and makes the CS flood risk situation impossible to understand for the general public. This needs to be

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13 <https://www.ipswich.gov.uk/content/development-and-flood-risk-spd>

14 <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Surface-Water-Management-Plans/Ipswich-Flood-Risk-Management-Strategy-v12.pdf>

15 <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/2018-Strategy-Documents/2016-04-Suffolk-Flood-Risk-Management-Strategy-v12.pdf>

16 <https://www.suffolk.gov.uk/assets/Roads-and-transport/Flooding-and-drainage/SUFFOLK-PFRA-REPORT-FINAL.pdf>

17 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/698246/PFRA\\_Suffolk\\_County\\_Council\\_2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/698246/PFRA_Suffolk_County_Council_2017.pdf)

clarified and made clearer so that any required actions can be properly identified and included in the CS for it to be understood by residents and for it to be sound. Given the current terrible flooding and that Ipswich is a FRA, this is a key issue that needs correcting.

### **Para 6.7**

The Vision needs to include an improvement in air quality levels and compliance with legally binding targets that are currently exceeded. IBC should have a Strategic Policy to comply with legally binding air quality targets and eradicate AQMAs within Ipswich for the benefit and protection of residents. The Climate Emergency also needs to be recognised in the Vision (please see our comments under CS1).

### **Objective 6.8.4**

This Objective needs to be strengthened to recognise the Climate Emergency for the CS to be sound (please see our comments under CS1).

### **Objective 6.8.5**

It is not clear what the 2004 levels are or how progress against these will be measured; 2004 emissions levels should be included in the CS for completeness so that the target is clear. For example, do 2004 measuring locations correspond with the current measuring locations and if not, how will IBC determine whether levels have returned to 2004? Furthermore, it is not clear when IBC aim to return to 2004 levels. This needs to be done as a matter of urgency and should not be left to 2036 as would be possible under the current Plan, by which time many more Ipswich residents will have died prematurely. IBC needs to comply with legally binding targets otherwise its CS is unsound.

### **Objective 6.8.6**

IBC has decided to remove its previous Objective to achieve modal shift of 15% by 2031 in the current Local Plan and needs to be asked why given this is still required for the CS to be sound. SCC Transport modelling (which we discuss later) confirms that major modal shift is required to deliver the CS (e.g. c15.5% by 2026 for existing journeys). Given the importance of achieving high levels of modal shift to deliver the Plan, it is imperative that a modal shift target for 2026 is included for the CS to be sound. IBC needs to explain why it no longer thinks having a modal shift target is important.

Ipswich CS Authority Monitoring Report 13, 2017/18 June 2019 fails to adequately report back on the current Objective 6 f. TARGET: To link with Travel Ipswich to achieve a 15% modal switch for journeys in Ipswich by 2031. Simply stating "*The Travel Ipswich measures have now been implemented. This target will be reviewed through the Ipswich Local Plan review.*" We believe the reason that the target has not been reported on is that little or no progress has been made and the that is has been removed because IBC knows it cannot be achieved. IBC needs to report the modal shift levels achieved through Travel Ipswich (formerly known as Ipswich – Transport Fit for the 21<sup>st</sup> Century) as this will indicate what levels of modal shift can be achieved in Ipswich.

We also note that Appendix5, pg 55 states "*The 2018 Travel to Work survey ran from the 7th May to 29th June 2018, outside the 2017/18 monitoring period. The 2018 results show that driving (single occupant and car share) remains the most frequently used mode of travel at 64.7% in 2018, an increase from 62.6% in 2017. The percentage of those travelling as a single occupant has risen compared to last year and currently stands at 62.6%, 3.5% higher than in 2017.*" This illustrates how difficult the required levels of modal switching will be to achieve, without which the CS is clearly unsound.

We believe IBC has failed to make any progress on the modal shift target of 15% by 2031. It clearly needs to provide evidence that it can deliver the required modal shift levels identified by SCC (e.g. c15.5% by 2026 for existing journeys) for the CS to be sound. If not, the CS needs to be revised accordingly to be sound.

IBS states that “*Additional east-west highway capacity could be provided within the plan period*” and needs to illustrate what it means by this and whether such capacity is required for the CS to be sound.

Paragraph 8.19, which states “*In addition to the integrated transport solutions, including bus network improvements within the town and increased capacity of the local rail offering, a northern route around Ipswich is expected to be needed to enable growth in the longer term.*” Ipswich Borough Council states support for such a route. We would like to draw attention to the article in the Ipswich Star (27 February 2019<sup>18</sup>) where the leader of Ipswich Borough Council, David Ellesmere, is quoted as saying “*A northern bypass is a priority infrastructure project for Ipswich*”. A position that was repeated in the East Anglian Daily Times Article<sup>19</sup> published on 22/02/2020 “It remains our position that the best solution would be the construction of the inner route of the northern bypass [to ease traffic problems in Ipswich]. Both the previous Labour and current Conservative Ipswich MPs have also argued for a northern route as a priority for Ipswich. This paragraph and the CS need to be updated to take account of the decision that the northern route will NOT be progressed further by SCC. Ipswich Borough Council needs to explain why its elected leader clearly believes that Ipswich cannot cope with existing volumes of traffic and that it is sound for the CS to increase traffic further. The Local Plan also needs to recognise that Suffolk County Council is also concerned about the ability for Ipswich to manage the existing volumes of traffic and announced on 18 February 2020 that it is setting up a taskforce to look at new ways of tackling the town's traffic problems. In response to the creation of the Suffolk County Council taskforce to improve Ipswich traffic David Ellesmere is quoted in the East Anglian Daily Times as demanding “a new link road connecting Europa Way with Bramford Road to alleviate traffic pressures, and work to explore a new road link connecting London Road, Hadleigh Road and Sproughton Road”.

Unless there is a huge change in public attitudes and behaviour plus substantial investment in other means of sustainable travel, improving the existing road infrastructure, including new technology, homeworking incentives, off-peak travel pricing incentives, regulatory instruments etc, **the plan will fail. A culture change will be needed. This is what the Start Ipswich Moving Campaign sets out to achieve.**

The future shift to electric cars will not suffice. There is equal serious health impacts from particulate matter from vehicle brakes and tyres <sup>20</sup> (Inside Health BBC Radio 4 Air Pollution; Infectious Disease). **The number of cars as well as the vehicle emissions is the problem.**

Considerable investment in public transport is required to deliver the Plan. Currently IBC has insufficient firm proposals or funding to deliver the required 2026 modal shifting target and subsequent modal shift levels throughout the CS period. The CS is therefore unsound as it lacks a credible transport solution that would support the proposed levels of growth.

### **Para 6.17**

We challenge the need for future development after 2031 in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road, which is no longer required by Suffolk Coastal to meet its housing target as this has been reduced substantially by the Planning Inspector:

1. **The Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018**  
Section 4.3 Land Northeast of Ipswich IP2 (Suffolk Coastal) recognises the sensitivity of the

18 <https://www.ipswichstar.co.uk/news/ipswich-northern-bypass-latest-1-5908955>

19 <https://www.eadt.co.uk/news/ellesemere-on-travel-taskforce-1-6527021>

20 <https://www.bbc.co.uk/programmes/m000fgf7>

open land between the edge of suburban Ipswich and the villages of Westerfield and Rushmere and that the area forms an important corridor of land. It states that “opportunities lie in the strengthening of landscape structure, softening of the urban edge and reinforcement and creation of corridors which penetrate the urban area”. It concludes that the area is “sensitive to development” and “care will be needed to ensure rural countryside beyond the Ipswich administration area continues to function as a green rim to the town”. These comments will clearly also apply to the open land within the Ipswich boundary. Even more so as the land is nearest the edge of suburban Ipswich and there is substantially less open land within the Ipswich boundary than Suffolk Coastal. We also note that this report was produced before the Ipswich draft CS proposal. Therefore, it does not consider the impacts of building on the open countryside within the Ipswich boundary, which will increase the sensitivity of the Land Northeast of Ipswich IP2 as described in this report. In our view, this land is too important and sensitive to be built on, especially as it will result in the need for an additional primary school, which has additional traffic implications.

2. We do not believe that the full proposed expansion of the town centre retail development is required or sustainable and that this land could be better used for new homes. Town centre homes are likely to have a far lower impact on traffic congestion and air quality than on the outskirts of Ipswich. We believe that there are opportunities to convert some of the existing excess town centre retail property into new homes. This approach should be used instead of building on at the northern end of Humber Doucy Lane and Tuddenham Road, which will add to traffic congestion into the town centre and along Valley/Rd/Colchester Rd etc. We note that Ipswich Central is also advocating an increase to the number of homes in the town centre<sup>21</sup>. This will help improve the town centre and the night-time economy, reduce traffic into the centre town (compared to other new build sites), facilitate modal shift and improve air quality. Why has this option not been considered by IBC?
3. We believe that the Parking Strategy over-estimates the parking demand, and hence the required land, for town centre parking and that this brownfield land would be better used for housing rather than the previously designated countryside at Humber Doucy Lane.
4. Traffic modelling shows that traffic from the development will further increase traffic at junctions that are already over-capacity without any road infrastructure projects proposed to rectify this forecast over-capacity.
5. The allocation of this land for housing is in breach of Policy CS16 regarding the protection and enhancement of green corridors and the CS “Green Rim” (regardless of the land having been designated as countryside). In our view, this is why Ipswich Borough Council wants to re-designate the green rim as bike and cycle trails without any justification and a distinct lack of cycle trails in the “green trails”. We discuss this in detail in our comments to Chapter 7, which should also be considered here.
6. The allocation of this land for housing is in breach of the current CS. POLICY DM8: The Natural Environment POLICY DM10: Green Corridors. It is also counter to the principles of POLICY DM11: Countryside and should remain classified as part of the Green Rim. It is also effectively non-compliant with Paragraph 8.80 as it is inconceivable there will be net gains in biodiversity and green infrastructure by building on the green rim.
7. The allocation of this land for housing is in breach of the current CS in relation to the corresponding Policies and Diagram 3 The Ipswich Core Diagram where it is designated as Green Rim. IBC has not provided enough evidence to justify this change of classification from countryside.
8. The North East Character Study recognises the benefits of this site as “a rural buffer” as open fields/countryside to urban Ipswich. Given the lack of such land in Ipswich, it is too important to be lost.
9. The housing requirement in Suffolk Coastal has been reduced by the Planning Inspector<sup>22</sup> from 582 homes pa (10,476) 2018-2036 to 542 pa (9,756) i.e. a reduction of 720 homes over

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21 <https://www.ipswichstar.co.uk/news/ipswich-needs-4-000-new-homes-1-6516012>

the Plan period. Clearly Suffolk Coastal no longer needs the land at Humber Doucy Lane to provide the 150 homes (to be built after 2031) that it had included in its final draft plan<sup>23</sup> (paragraph 12.209) and the allocation of this land is therefore not sound.

Regardless, there should be no development of this land until the completion of the IGS. This needs to be made clear in the CS. For the CS to be effective, the Sustainability Appraisal needs to fully assess the implications on building on this site and whether delivering more homes in the town centre instead of retail expansion might be a more sustainable option.

## **CHAPTER 7: The Key Diagram** (and all other references to the green rim/trail)

We strongly disagree with the proposed change to replace “green rim” with “green trail” in (v) The ecological network, green corridor and green rim approach to strategic green infrastructure (policy CS16). The proposed change to the green rim has not been assessed by the Habitats Regulations Assessment (HRA) and needs to be included in the HRA accordingly.

The existing green rim is an asset and should be protected by adding it to Policy CS4, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it and hence destroy it.

The Ipswich Local Plan – Regulation 19 draft presented at the Council Meeting on 8<sup>th</sup> January 2020 states, in the last paragraph of Section 2.47 The Development Management, that “*There has been some confusion arising from the Preferred Options consultation responses on the purpose of the ‘green rim’, which are principally orbital routes for walking and cycling around the periphery of the Borough although it is acknowledged that they are important routes for biodiversity and the wider ecological network. It is suggested that these be renamed as ‘green trails’ which shows that these areas are also connected with walking and cycling.*”

It is our view that the Council in its paper is mis-leading Councillors as the concept of corridors and the green rim was for the corridors to provide access on foot or by cycle to the countryside surrounding Ipswich. That countryside then became known as the green rim and the intention was for the green rim to be protected from development. We note that in subsequent CSs the green rim has been considerably reduced in size, which demonstrates the Council’s lack of commitment to protecting open space and improving biodiversity in its own Plans. The change in definition is effectively non-compliant with policy DM8.

In our view, the Council is doing this so that it can bring forward land around Humber Doucy Lane, which has previously been designated as countryside, and then as part of the green rim, for development in the revised draft of the CS by removing the protection that it currently has. If the Council wants to do this then it should be clear and transparent that it proposes to build on land previously designated as countryside/green rim rather than by deviously trying to re-designate the land as a pedestrian/cycle green trail (which was never the intention of previous CSs). We believe that there are other brownfield sites in Ipswich that could be used instead.

In Appendix 1, we illustrate the history of the green rim/corridors in various drafts of the CS below and include a comparison of actual cycle routes to the revised green trails demonstrating that it is the Council that is “confused” about the original purpose of the green rim. We also note that there is no

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[https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk\\_Coastal\\_Local\\_Plan\\_Po st\\_hearings\\_letter.pdf](https://suffolkcoastallocalplan.inconsult.uk/gf2.ti/f/1006178/63765093.1/PDF-/Suffolk_Coastal_Local_Plan_Po st_hearings_letter.pdf)

23<sup>25</sup> <https://www.eastsuffolk.gov.uk/assets/Planning/Suffolk-Coastal-Local-Plan/Final-Draft-Local-Plan/Final-Draft-Local-Plan.pdf>

mention of the Green Rim (or Green Trail) being used for cycling in the Ipswich Cycling Strategy<sup>24</sup> adopted in March 2016 as part of the CS.

## **Chapter 8 Scale and location of growth**

We have argued for many years that previous homes and employment targets set by Ipswich Borough Council were too high, unrealistic and based upon flawed evidence. It is now clear that previous Plans were unsound and by their very nature were therefore sub-optimal for Ipswich as we argued strongly at the time. It is disappointing that Ipswich Borough Council has taken so long to accept this. We believe the proposed lower targets are more realistic. We agree with IBC that it has established a 5-year land supply of 5.06 years including a 20% buffer or contingency in the 5-year supply.

## **Policy ISPA2 Strategic Infrastructure Priorities**

This needs to include the following highway schemes that SCC assumes will proceed in Ipswich in its ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2 along with the dates they are required by. Without these being implemented the modelling work, and hence the CS is unsound.

1. Bixley Road / Heath Road / Foxhall Road Additional lane NB for Bixley Road / Additional lane SB for Heath Road
2. Nacton Road / Maryon Road Turn WB Nacton to two lanes, and EB Nacton to one lane
3. Upper Orwell Street Changed to one-way southbound from St Helen's Street
4. St Helen's Street / Bond Street Bus lane removal (we question how this will improve bus services?)
5. Ipswich Radial Corridor Route improvements - Felixstowe Road. Capacity increase to Felixstowe Road & Bixley Road arms of roundabout with A1156 Bucklesham Road. Capacity increase at Bixley Road / Ashdown Way junction
6. Ipswich Garden Suburb – Henley Gate Two signalised junctions included as part of site access onto Henley Road
7. Ipswich Garden Suburb – Fonnereau Priority controlled junction included on Westerfield Road in relation to access
8. Ipswich Garden Suburb – Red Hill Farm Two priority-controlled junctions included on Westerfield Road, north and south of Fonnereau access junction
9. A1214 Valley Road / Westerfield Road Increased capacity modelled on A1214 approaches to roundabout due to flares
10. A1214 Valley Road / Tuddenham Road Increased capacity modelled on A1214 approaches to roundabout due to flares
11. Europa Way link road Link road between Sproughton Road and Bramford Road, extension of Europa Way with priority-controlled roundabouts
12. A1214 / Bell Lane Ban of right turn from A1214 onto Dr Watson Lane. Signalised junction of A1214 / Bell Lane changed to priority-controlled roundabout [we note this is not in Ipswich and appears to have been incorrectly grouped under Ipswich]

This list excludes improvements to the Henley Road/Dale Hall Lane junctions with Valley Road which are required to be delivered by Crest Nicholson after occupation of the 299th home on its Henley Grange IGS site (as stated in the planning application Decision Notice). It needs to be confirmed whether this infrastructure project has been included and modelled accordingly. It needs to be added to the list of projects.

We support the inclusion of sewage infrastructure in ISPA2. We have argued for this for many years and its inclusion is long overdue. We believe specific reference to it being required for the delivery of the Ipswich Garden Suburb, which still has no agreed site-wide sewage infrastructure solution after over 10 years of planning for one.

24 [https://www.ipswich.gov.uk/sites/default/files/cycling\\_strategy\\_spd.pdf](https://www.ipswich.gov.uk/sites/default/files/cycling_strategy_spd.pdf)

## **Policy IPSA4 and Paragraphs 8.24-8.26**

Please see comments on Paragraph 6.17. Paragraph 8.24 states that development will “follow the delivery of the Ipswich Garden Suburb”. We disagree on the need for this land to be developed, but if it is then it needs to be made clear throughout the CS document that this can only happen following the delivery of the IGS development, rather than “appropriately phased”. Without this stipulation it could detrimentally impact on demand for homes at the IGS leading to a stalled and incomplete development of the IGS for many years. It is premature to phase it with the IGS development rather than at the end of the IGS development.

## **Policy CS1**

Sustainable Development needs to reflect the legal requirement to comply with Air Quality targets, as well as considering them elsewhere in the CS for the CS to be sound.

At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. This commitment will clearly impact on the CS and needs to be referenced here and in relation to other relevant policies e.g. DM1 and DM2 for the CS to be sound. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

## **Policy CS4, Policy CS17 and DM8**

The existing green rim is an asset and should be protected, especially as Ipswich Borough Council have previously massively reduced its size and are now attempting to reclassify it (see above). It should be included in CS4 accordingly for the CS to be sound.

We have some concern that IBC may not be providing enough recreational mitigation for its RAMSAR sites. It is not clear what RAMS S106 payments (agreed on 30/01/20) have been agreed with CBRE and Crest IGS sites as the S106 have not been made publicly available by IBC with its Decision Notice in February 2020 on granting outline application approval.

### The Suffolk Coast European Sites Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (SPD) 2019

This was approved by the Executive on 7th January 2020, which implies the S106 agreements should include RAMS mitigation payments as they were agreed after the SPD was approved by the Executive.

We note that Paragraph 2.4 states "*It should be noted that some residential schemes, particularly those located close to a European Site boundary or large scale developments, are likely to need to provide additional mitigation measures (in addition to the tariff) such as Suitable Alternative Natural Green Space (SANGS) or green infrastructure measures. This would need to be assessed through a project level Habitats Regulations Assessment (HRA) (including Appropriate Assessment).*" Therefore, it would appear that the delivery of the Country Park is therefore an additional requirement to the RAMS tariffs.

However, IBC did not request any S106 contributions from either CREST or CBRE for any of their homes on the IGS for recreational mitigation when the outline application was approved subject a

number of conditions at the Planning & Development Committee Wednesday 4th April 2018  
CREST - Para 5.16 of <https://democracy.ipswich.gov.uk/documents/s20697/Item%2001.pdf> other than £7.5k HRA for monitoring  
CBRE - Section 10 of <https://democracy.ipswich.gov.uk/documents/s20700/Item%2002.pdf> other than £7.5k HRA for monitoring

The SPD also states

*3.2 What types of application does this apply to?*

*The Suffolk Coast RAMS tariff applies to all full applications, outline applications, hybrid applications, permitted development, and reserved matters applications where no contribution was made at the outline application or hybrid application stage.*

*Sites that already have planning permission will not be required to pay any additional mitigation sum, unless they are resubmitted for consideration.*

*3.3 The Suffolk Coast RAMS contribution is payable in addition to any Community Infrastructure Levy (CIL) liability and/or any other S106 or S278 contributions for other types of contribution and there may be other site-specific mitigation requirements in respect of European Sites and ecology.*

If there are no RAMS tariffs included in the S106 agreements this could be in breach of this SPD, Policy CS4, CS17 and Policy DM31 The Natural Environment of the current Ipswich CS. It also means the new CS would be unsound in relation to CS4 CS17 and DM 8 The Natural Environment as there is no means of funding the required. We believe further examination of the issue is required to provide confidence that the CS is sound in relation to this issue.

### **Policy CS5 Improving Accessibility**

States that the Council will work with the Highway Authority including through the Local Transport Plan to manage travel demand in Ipswich and maximise sustainable transport solutions and in doing so will prioritise the development of an integrated cycle network. During the duration of the current CS and despite the agreement of the Cycling SPD, we have seen no improvements to the cycle network. Indeed, the only major changes that we are aware of are:

- The removal of the dedicated cycle lane on Felixstowe Road out of Ipswich towards Sainsburys.
- The construction of steps on the Cornhill effectively blocks off the previous direct cycle route between Lloyds Avenue and Princes Street. This was the only cross-town cycle route that did not involve the use of dangerous counter-flow cycle lanes (Northgate Street and Museum Street) in the town centre. Neither of these counter-flow cycle lanes meet cycle lane guidelines<sup>25</sup>.

Both these changes, especially the town centre one, result in a more segregated cycle network and will deter cyclists rather than encourage them. We also note that the cycle route along the Christchurch Park Bridleway remains in a dangerous state of repair since the current CS was approved. This shows a distinct lack of commitment to even maintaining the existing cycle network.

We also note that much of the Ipswich cycling infrastructure is sub-standard and fails to comply with recommended minimum standards for cycle lane width for both dedicated cycle lanes and shared

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<sup>25</sup>The desirable minimum width of any contraflow lane is 2m. Where space is constrained it may be reduced to an absolute minimum of 1.5m. The width of the with-flow traffic lane may be as little as 2.5m where there are low volumes of heavy goods vehicles and the servicing needs of shops and other premises are met by off-street loading or other means. The preferred minimum width is 3m as this is less likely to cause with-flow traffic to encroach upon the cycle lane. Cycling England A.06 Contra-Flow Cycling.

pedestrian/cycle routes. The latter acts as a barrier to both walking and cycling. The required levels of modal shift will not be delivered with such sub-standard infrastructure.

Paragraph 33 of the [Transport Topic paper](#) states that “*There has also been a variety of cycling and walking initiatives built around the balanced transport plan for Ipswich*” but fails to provide any evidence of this. The Council needs to detail the initiatives delivered by the Council in the last few years since the adoption of the current Core Strategy and the Cycling Strategy Supplementary Planning Document in March 2016 and the current CS in February 2017 and advise on the level of modal shift has been achieved by them. We have not been able to find any evidence of the levels of modal shift achieved by these initiatives (nor what the specific initiatives actually are). In relation to the provision of cycling infrastructure in the current CS, there seems to have been no progress in delivering the requirements of:

- CS5 Improving Accessibility Enables access across town safely and conveniently by foot and by bicycle - work with the Highway Authority through the Local Transport Plan prioritise the development of an integrated cycle network.
- CS16 Green infrastructure, Sport and Recreation Strengthens ecological networks that link inner and outer parts of the Borough by providing walking and cycling routes.
- CS20 Key Transport Proposals Seeks improved cycling and walking routes between key nodes.
- SP15 Improving Pedestrian and Cycle Routes Support improvements to pedestrian and cycle routes within the IP-One area and linking the town centre to residential areas and beyond.

The level of achievement by IBC will help determine how effective the CS is likely to be in delivering its accessibility and modal shift objectives and whether it is sound in these respects.

The [SUFFOLK COUNTY COUNCIL Draft Local Cycling & Walking Infrastructure Plan](#) (dated 15/03/2019 presented at Suffolk Cabinet 20/January 2020)

This identifies the requirements and options for planning of future opportunities to make improvements to the cycling and walking network. We are disappointed that this document has not been included by IBC in the Evidence Base as it clearly shows the poor existing walking and cycling infrastructure in Ipswich. The draft LCWIP assesses a number of corridors in Ipswich but does not include any actions or funding to improve these. The corridors are assessed using WRAT and CLOS assessment tools.

As part of the Welsh Active Travel Design Guidance a Walking Route Audit Tool (WRAT) was developed to assist Local Authorities with the auditing of walking routes. The auditing methodology targets the five core design outcomes for pedestrian infrastructure, which are similar to those for cycling. These are: • attractiveness • comfort • directness • safety • coherence. Each design outcome has several sub-categories that are each scored 0-2 with a score of 70% (28/40) being normally regarded as the minimum provision overall.

CLOS (cycle level of service) scores Cycling Level of Service is an audit tool developed by Transport for London. It is designed to assess the quality of cycling provision in existing (and proposed) schemes, with a final score out of 100. Good (Dutch-quality) schemes should be scoring between 70 and 80 out of 100.

In order to achieve the high targets of modal shift then, the key corridors should exceed the minimum standards of good design. However, it is clear from the assessments below that the existing walking and cycling infrastructure in Ipswich is massively sub-standard and without major improvements there is absolutely no chance of achieving the modal shift targets required and hence the CS is unsound in respect of Policy CS5 and subsequently CS20 Transport and DM3 Air Quality.

Corridor	WRAT	CLOS
Minimum level required <sup>28</sup>	70	
London Rd / Hadleigh Rd	27.2	58
Wherstead Rd	24.4	32.6
Henley Rd / Westerfield Rd	24.7	37.2
Birkfield Drive	18.25	41.5
Hawthorn Drive	19.5	30.7
Inner orbital	31	45 estimated from parts that can be scored unable to provide average score as some parts have no cycling or walking provision
Gipping River Path	20.6	44.3
Woodbridge Rd / Spring Rd	28.6	42.3
Nacton Rd / Landseer Rd	27.8	41.4

It should also be noted that the assessments are based on the most suitable route, rather than routes walkers and cyclists might actually use so these scores will be higher than what is will be experienced on average. Clearly cycling and walking in Ipswich is currently an unattractive, unsafe, incoherent, uncomfortable experience that is also non-directional.

The Transport Modelling, which we will discuss later, includes extremely challenging modal shift assumptions. Unless IBC can provide evidence of sufficient funding and plans in place to improve the ineffective cycling network the required levels of modal shift cannot possibly be achieved, and the CS cannot be found to be sound.

We also note that Ipswich Buses, operated by IBC, continues to use the outdated approach of having bus routes that just go into town rather than establishing radial routes such as along the A1214/Heath Rd from ASDA/Whitehouse, past the hospital, to Futura Park/Ransomes/Havens. Bus route 2 currently stops at the hospital and could easily be extended to the ASDA/Whitehouse area. Such an approach would provide a more direct quicker route for many people and have the advantage of avoiding the town centre AQMAs. We would like to see the CS Preferred Options include a requirement on IBC to assess and test the viability of such bus routes to Improve Accessibility and help contribute to modal shift. Substantial investment in the Ipswich bus network is required, including the expansion of the Ipswich Park and Ride network.

#### IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS<sup>26</sup>

This Financial Plan covers up to 2023/24 and was approved at Council on 19/02/2020. Paragraph 32 identifies IBC's top ten projects for this period, which includes "*providing high quality multi-story and surface car parking*". However, there is no money allocated over the four-year period to improving air quality, delivering modal shift or improving cycle and pedestrian infrastructure (i.e. to improve accessibility) despite the CS being dependent on achieving 15% modal shift and IBC being in breach of legally binding air quality limits. There is not even any mention of 'modal shift', 'air quality', 'cycling', 'walking', 'traffic' or 'sustainable travel' in the 98 page document, which would appear to illustrate the lack of commitment of IBC to invest in improving these areas. IBC is clearly prioritising encouraging people to drive into the town centre rather than use more sustainable means. The CS is clearly not effective as IBC has not allocated any funding towards delivering modal shift or improving air quality.

#### Paragraph 8.97 and Policy C20 e) reference to the [Car] Parking Strategy and Plan

<sup>26</sup> <https://democracy.ipswich.gov.uk/documents/s27023/C-19-19%20MTFP%20Appendix%201%20-%20Financial%20Strategies%20and%20Medium%20Term%20Financial%20Plan%202020-21%20Onwards.pdf>

It is not clear if the Ipswich Parking Strategy as drafted by WYG Transport Planning dated March 2019 has actually been approved by the IBC Executive. The IBC website Decision List shows a decision by the Executive was due on 29<sup>th</sup> October 2019, but the Strategy was not on the agenda. It now seems to have disappeared from the Decision List without a decision being made. IBC needs to detail the current situation with the Parking Strategy.

Paragraph 2.4.6 states that the Strategy is based on 12,500 additional jobs target 2011-2031 on 35 hectares whilst the proposed target is for approximately 9,500 jobs on 23.5 hectares by 2036 – a substantial reduction. Paragraph 2.4.4 states that it is based on 8,840 new dwellings by 2036 – the new target is 8,010. The new targets therefore render the Strategy obsolete. With the reduction in these targets, especially new jobs, it is logical to assume there will be a reduced requirement in land for car parking. We believe this brownfield land would be better used for housing before any development of the Humber Doucy Lane site. The CS is unsound in allocating the Humber Doucy Lane site for housing ahead of excess brownfield car parking sites. As shown in its FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS, IBC is prioritising improving town centre car parking and encouraging car journeys into town ahead of funding the encouragement of more sustainable forms of transport. This is in breach of the proposed CS

At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. The Car Parking Strategy drafted in March 2019 needs to take account of this, especially given the Council operates many car parks in Ipswich, for the CS to be sound. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

### **Policy CS10 Ipswich Garden Suburb**

We have major concerns on the ability of the road network to cope with the additional traffic from the IGS without some form of northern relief road.

We are pleased that IBC secured £9.8m from the Housing Infrastructure Fund for the country park and the two road bridges over the railway. We believe this money is required to be committed by March 2022 (following an extension to the original date of March 2021). If this is the case, we are concerned that this critical infrastructure may not be delivered in time to secure the funding as work is yet to start on-site. We are particularly concerned that the relevant Decision Notices granting Outline Planning Permission for the Crest Nicholson IGS development only requires the Vehicular Bridge to be delivered upon the delivery of 699 homes. Clearly it is impossible to build this number of homes before March 2022 although it may be possible to demonstrate "commitment" as required by the HIF. We are already concerned that the existing Henley Road bridge over the railway is not wide enough to allow cyclists, pedestrian and cars to pass safely yet there are no improvements planned for this bridge. Without the early delivery of the road/pedestrian bridge and associated links into town that avoid the Henley Rd rail bridge, there is no safe walking/cycling route from the Crest Henley Gate development into town and the CS would consequently be unsound.

The Section 106 agreements for the two approved IGS sites may well include measures to safeguard HIF funding, or provide for other means of securing the required funding. These are technical and complex documents that are difficult for the public to understand. We believe that IBC needs to provide evidence that this infrastructure will be delivered in time to secure the funding and that contingency measures are in place to secure alternative funding for this infrastructure for the CS to be considered sound. As we discuss later in our submission the delivery of the IGS road infrastructure problems needs to be compatible with the dates assumed in the SSC traffic modelling. Evidence needs to be provided this is the case, before the CS can be found to be sound.

We are pleased to see that S106 payments agreed for the two approved IGS sites include funding for improved off-site infrastructure such as improving the Bridleway, cycle routes and providing crossings on Valley Road and Park Road. However, the trigger points for these payments are split into three instalments, with the last one prior to occupation of 500 homes for the CBRE/Mersea site and 600 homes for the Crest Nicholson site. Unless funding is provided from elsewhere to deliver the offsite infrastructure earlier than these trigger point dates, the required levels of modal shift will not be achieved by 2026 as the required sustainable travel infrastructure around the IGS will be incomplete.

We note that the S106 payments schedule for Henley Gate requires Crest Nicholson to deliver the Smarter Choices Programme for homes between Norwich Road and Henley Road (bounded by Valley Road). However, this is not required to commence until occupation of the 500<sup>th</sup> home. Consequently, there will be no modal shift programme implemented for this area in time to deliver the 15% modal shift requirement that is assumed in the transport modelling by 2026. The CS is therefore unsound in this respect.

WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions January 2020

3.9 IPSWICH RESULTS SUMMARY show that even with the high levels of modal shift and new infrastructure many junctions will become unacceptably congested around the Ipswich Garden Suburb.

3.9.1. Several of the A1214 corridor junctions operate with an overall V/C greater than 85%.

- A1214 / Dale Hill Lane – approaching capacity in AM/PM peaks in 2036. [Although not stated we also note that this junction is approaching capacity in 2026.]
- A1214 / Henley Road –approaching capacity in 2036 AM/PM.
- A1214 / Westerfield Road – approaching capacity in 2036 AM/PM peaks.
- A1214 / Tuddenham Road – approaching capacity in AM peak in 2036.
- A1214 / Rushmere Road – approaching capacity 2036 AM/PM peaks.

However, previous modelling for both Application IP/16/00608/OUT Land North Of Railway And East Of, Henley Road, Crest Nicholson (see Paragraph 5.121) and Application IP/14/00638/OUTFL Land To South Of Railway Line, Westerfield Road, CBRE/Mersea Homes (see Paragraphs 5.69 and Paragraph 8.484) has shown that these junctions are already operating at or near capacity at peak times and will continue to do so. By applying a 15% modal shift reduction, the modelling is hiding the fact that Ipswich roads are already heavily congested with many roads already operating at capacity at peak times.

In addition, Figures 15 and 16 also illustrate the many links that reach capacity, most notably on most of the A1214 from the hospital to Bramford Rd and on surrounding roads around the Ipswich Garden Suburb. Further modelling of these junctions and links at capacity at Peak times and either side of the peaks, is required to assess the impacts throughout the day. If they remain congested for long periods, then clearly the CS cannot be found to be sound for Transport and Air Quality. The modelling work needs to identify when these junctions and links reach capacity and how congestion will be mitigated as evidence for the CS to be sound; there is a big difference with this happening in say 2027 or 2035 between the modelled periods or even before 2026 in some cases.

We are also concerned that the modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads such as Elsmere Road and Dale Hall Lane as well as Park Road, which are not designed for heavy traffic and have not been included in Air Quality Assessments. It is obvious that in 2026 air quality will be worsened on these roads, which is in breach of the CS and therefore unsound. We note that this level of excessive congestion is forecast even if high modal; shift rates are achieved etc. We are also concerned that Air Quality limits will worsen between now

and 2026 yet there is no assessment of this.

We note that the CBRE/Mersea planning application for the IGS assumed that the “flagship project” Ipswich – Transport Fit for the 21<sup>st</sup> Century (renamed Travel Ipswich) would reduce dependency on car by 15%, whilst the Crest application assumed 20% reduction for work, business and other activities. It is clear the current network is completely UNFIT for the 21<sup>st</sup> Century and without substantial additional investment than that proposed it will remain this way.

Despite the Cross-Boundary Water Cycle Study report<sup>27</sup> there remains a lack of understanding and detail on what new additional sewage infrastructure will be required or evidence that the sewage infrastructure required for the IGS can be delivered despite first requesting this almost 10 years ago. Anglian Water’s proposed strategy to upsize 330 metres length of sewer along Valley Road and provide 550 cubic metres of storage off-line storage under Valley Road solution was briefly mentioned in the outline planning application for the Mersea Homes outline planning application for Land To South Of Railway Line, Westerfield Road IP/14/00638/OUTFL. There is still no agreed solution despite the two IGS outline applications being approved in February 2020. We note that IBC has stipulated that “Prior to the submission of the first Reserved Matters application a Site Wide Foul and Surface Water Drainage Strategy which covers the entire development site.”

If sewage infrastructure cannot be provided at the right time and at the right price for the IGS (as a whole) then the IGS cannot be delivered in accordance with the Plan. The implications of the construction of new sewage infrastructure on Ipswich need to be considered as part of the CS. For instance, providing a 550cubic metres sewage storage tank under Valley Road. will require its closure for many months and have a major detrimental impact on traffic and air quality in Ipswich. Sewage infrastructure requirements urgently need to be considered in Policy CS10 and included in the Infrastructure Table 8b. In our view, all off-line sewage storage should be provided on the IGS site to minimise traffic impacts and prevent the worsening of Air Quality in areas already exceeding legal limits in Ipswich.

The effectiveness of the CS to deliver both employment and homes growth including the IGS could be seriously undermined by the ongoing failure to properly assess the cumulative requirement of Ipswich for wastewater infrastructure over the CS period and plan for its provision. This remains a major failing of the CS making it unsound. We note that improvements to sewage infrastructure has been included in ISPA2 and it also needs to be included in relation to the IGS.

The potential impact of Sizewell C on the IGS and the CS has not been assessed in any form of sensitivity analysis. We have previously raised concerns of the impacts of increased rail freight for Sizewell C on the Ipswich – Westerfield stretch of the rail-line regarding air pollution, noise, operation of Westerfield level crossing and the proposed pedestrian bridge, which have been ignored. In its response to the latest consultation on Sizewell C<sup>28</sup>, we are pleased to see that IBC now shares these concerns, but still fails to assess the potential impacts in relation to the IGS and the CS. The potential impacts of Sizewell C as raised by IBC in its consultation response needs to be assessed in relation to the soundness of the CS preferred options through sensitivity analysis prior to a decision being made on whether it proceeds.

We believe the Council’s estimate requirement for increased retail space in Ipswich town centre remains flawed and question the need to allocate part of the Westgate site and the Mint Quarter for retail. We have always argued that Ipswich Borough Council has been over-estimating retail demand (as with previous undeliverable homes and employment targets). We believe that less retail space

27 [https://www.ipswich.gov.uk/sites/default/files/cross-boundary-water-cycle-study\\_jan\\_2019.pdf](https://www.ipswich.gov.uk/sites/default/files/cross-boundary-water-cycle-study_jan_2019.pdf)

28 <https://democracy.ipswich.gov.uk/documents/s23982/Item%2011%20Appendix%202%20Sizewell%20C%20Stage%203%20consultation%20IBC%20proposed%20response.pdf>

will be required in future and that some of it should be reallocated for housing in preference to of green space at the northern end of Humber Doucy Lane and Tuddenham Road. As mentioned above we believe there will be less land required for car parking in and around the town centre and that this land should also be reallocated for housing ahead of the Humber Doucy Lane green space for the CS to be sound.

### **Policy CS16 Green Infrastructure, Sport and Recreation**

The proposed allocation of land for housing at the northern end of Humber Doucy Lane and Tuddenham Road is in breach of Policy CS16, e.g. in relation to the protection and enhancement of green corridors. The CS is therefore unsound.

### **POLICY CS17: Delivering Infrastructure**

We remain concerned that the proposed development of the Ipswich Garden Suburb without improved road infrastructure will severely impact on traffic congestion and air quality and adversely affect the quality of life of residents.

At a strategic level, the Water Cycle Study concludes that, based on the predicted housing growth in IBC and SCDC, it is anticipated that no works/ upgrades to the existing water recycling centre (WRC) at Cliff Quay, other than those already planned by Anglian Water, are required. In terms of the Ipswich area, Anglian Water have the following three projects committed in their Water Recycling Long-Term Plan (2018)<sup>29</sup>

- Increased Water Recycling Centre Process Capacity - £12.3m cost – Scheduled for completion by 2032;
- Combined Sewage Overflow improvements - £11.96m cost – Scheduled for completion by 2027; and
- Increased Drainage Capacity through surface water management and upsizing (Defined Contingent Scheme) - £15.496m cost – Scheduled for completion by 2027.

This is clearly major infrastructure that is required for the delivery of the CS and should be included in the Infrastructure Table for the CS to be sound.

However, there is still no sewage infrastructure solution for the IGS or for the wider ISPA area despite it being a strategic priority (Policy ISPA2 Strategic Infrastructure Priorities i)). IBC needs to work far more closely with Anglian Water (and ISPA) to undertake a proper assessment of the cumulative homes and jobs expansion needs for strategic wastewater infrastructure in and around Ipswich to identify and cost key infrastructure deliverables. These need to be properly included in both CS Infrastructure Tables 8A and 8B as well. Without proper assessment and clear details of required sewage infrastructure to deliver the CS it is clearly unsound.

Please see our comments under Policy CS4 in relation to RAMSAR sites.

### **POLICY CS20: Key Transport Proposals**

It is worth noting that The Upper Orwell Crossings (the Wet Dock Crossings) will not proceed as there is insufficient funding (although new proposals for pedestrian crossings may be developed). SCC has also confirmed the Ipswich northern relief road will also not proceed. Without these major infrastructure projects, we believe increased congestion is likely to be severe and unacceptable without substantial investment in improving the existing road network, bus routes, rail services, dedicated cycle routes and major funding to support modal shift including funding to change the attitudes and behaviours of existing residents in relation to their transport modes. We believe that

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29 [https://www.anglianwater.co.uk/\\_assets/media/water-recycling-long-term-plan.pdf](https://www.anglianwater.co.uk/_assets/media/water-recycling-long-term-plan.pdf)

evidence needs to be provided to the Planning Inspector that substantial funding is available to deliver these improvements for the CS to be found to be sound.

We note that the traffic modelling does not assess the impacts of the potential construction of Sizewell C. Clearly this will have a major impact on traffic in Suffolk and Ipswich as recognised by IBC in its latest consultation response on Sizewell C proposals. As well as construction traffic itself, IBC agrees there will be an increase in the number of outward commuters from Ipswich/local areas and weekly commuters from further afield. The Transport assessment will need to be revised if Sizewell C proceeds.

We are pleased to see the WSP/ Suffolk County Council ISPA LOCAL PLAN MODELLING Methodology Report and the WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions – (January 2020) which updates previous January 2019 modelling work. However, we have major concerns with some of the key assumptions and outputs.

#### ISPA LOCAL PLAN MODELLING Methodology Report Table 3-2

As mentioned above this shows the future highway schemes which have been included in the forecast model networks within Ipswich which are all assumed to be in place by 2026 (**we have added relevant references to IGS for clarity**).

1. Bixley Road / Heath Road / Foxhall Road Additional lane NB for Bixley Road / Additional lane SB for Heath Road
2. Nacton Road / Maryon Road Turn WB Nacton to two lanes, and EB Nacton to one lane
3. Upper Orwell Street Changed to one-way southbound from St Helen's Street
4. St Helen's Street / Bond Street Bus lane removal [**we question how this will improve bus services?**]
5. Ipswich Radial Corridor Route improvements - Felixstowe Road. Capacity increase to Felixstowe Road & Bixley Road arms of roundabout with A1156 Bucklesham Road. Capacity increase at Bixley Road / Ashdown Way junction
6. Ipswich Garden Suburb – Henley Gate Two signalised junctions included as part of site access onto Henley Road [**required as part of Crest Nicholson planning consent**]
7. Ipswich Garden Suburb – Fonnereau Priority controlled junction included on Westerfield Road in relation to access [**required as part of CBRE planning consent**]
8. Ipswich Garden Suburb – Red Hill Farm Two priority-controlled junctions included on Westerfield Road, north and south of Fonnereau access junction [**should be required as part of Red Hill planning consent when determined**]
9. A1214 Valley Road / Westerfield Road Increased capacity modelled on A1214 approaches to roundabout due to flares [**required before 599 homes occupied on Henley Gate site and 399 homes occupied on CBRE site as stated in the Decision Notices**]
10. A1214 Valley Road / Tuddenham Road Increased capacity modelled on A1214 approaches to roundabout due to flares [**required before occupation of 499 homes built on CBRE site as stated in the Decision Notice**]
11. Europa Way link road Link road between Sproughton Road and Bramford Road, extension of Europa Way with priority-controlled roundabouts
12. A1214 / Bell Lane Ban of right turn from A1214 onto Dr Watson Lane. Signalised junction of A1214 / Bell Lane changed to priority-controlled roundabout

As noted above this list excludes **improvements to the Henley Road/Dale Hall Lane junctions with Valley Road** which are required by SCC from Crest Nicholson before 299 home are occupied on its IGS site (as stated in the Decision Notice). We note that the IGS Highways projects are not secured through S106 Agreements but will be provided by the Developers.

It is not clear whether these projects will be funded separately by SCC outside of the Transport

Mitigation Programme or will be funded as part of the Transport Mitigation programme budget. It is unclear what completion dates for these infrastructure projects has been assumed in the modelling work and whether these assumptions are realistic and consistent with the trigger points placed on the IGS developers. Evidence needs to be provided of how each infrastructure project is intended to be funded and when it needs to be completed (as assumed in the modelling work). Currently there is too much ambiguity around these assumptions. We are especially concerned that A1214 junctions' improvements will not have been delivered by 2026 as assumed in the model. Without evidence that funding is available to deliver these 13 projects at the required time the CS is unsound.

As previously mentioned, these projects need to be included in the Infrastructure Tables. If any of the projects are not delivered by the required dates (which need to be identified in the modelling work so they can be tested to be sound) then the traffic modelling will be flawed as traffic flows will not have been properly assessed and the CS unsound. Evidence needs to be provided to the Planning Inspector that funding is in place for these schemes compatible with the required delivery dates which need to be specified.

We note that rail freight from Felixstowe Docks is planned to increase by 50% and the number of trains by 30% with the upgrade of the rail line to Ipswich. This will result in a major increase in the number of closures of Westerfield level crossing and for a longer duration. Westerfield Road is the main access route to the IGS developments (other than the Henley Gate/Crest Nicholson development). Therefore, IBC needs to provide evidence that the SCC modelling assessment has included the impact of the increased closure frequency of Westerfield Road level crossing on traffic for the CS to be sound.

The following Tables show the trip generation reductions assumed in the modelling work, if these are not achieved the modelling is essentially unsound as will be the CS, as the transport network will not be able to cope with the traffic.

Table 5-1 – Trip generation reductions applied to existing road users

Trip type	0-2.5km	2.5km-8.5km	8.5km+
Urban-urban	30.00%	15.00%	5.00%
Urban-rural	5.00%	5.00%	5.00%
/ rural-urban			
Rural-rural	0.00%	0.00%	0.00%

Table 5-2 - Trip generation reductions applied to development trip generations

Land Use Type	Development Type	Small	Medium	Large
Residential	Town Centre	10.00%	12.50%	0.00% <sup>30</sup>
Residential	Urban	5.00%	10.00%	10.00%
Residential	Rural	2.00%	2.00%	2.00%
Employment	Town Centre	15.00%	20.00%	20.00%
Employment	Urban	10.00%	15.00%	15.00%
Employment	Rural	3.00%	3.00%	3.00%

We note that “For any development from which trip rates and trip generation was determined from an existing Transport Assessment (i.e. greater than 500 dwellings / jobs), no trip generation reduction was applied as it was assumed a shift to sustainable travel was already accounted for within the Transport Assessment”. We agree with this approach to prevent double counting.

We note that the assumed modal shift rates for the Crest Nicholson and CBRE/Mersea developments in their approved planning applications were 20% (from work, business and other activities, and 30%

<sup>30</sup> 0% as there are no such developments

for travel to the secondary school) and 15% respectively.

Table 6-4 - 2026 Reduction in existing car trips

Sector	ID	AM 2026		PM 2026	
		Origin	Dest	Origin	Dest
	All	-9%	-9%	-10%	-10%
Ipswich Central	800	-12%	-15%	-15%	-15%
Ipswich NW	801	-13%	-13%	-13%	-14%
Ipswich NE	802	-17%	-17%	-17%	-17%
Ipswich SE	803	-15%	-15%	-15%	-16%
Ipswich SW	804	-17%	-14%	-15%	-14%

We note that the reduction in 2036 is very similar.

Tables 6-6 to 6-9 show reduction in trips from new road users for 2way trips in Ipswich these are

- 12% AM 2026
- 13% PM 2026
- 11% AN 2036
- 12% PM 2036

In Section 6.4 TOTAL TRIP MATRIX REDUCTION Tables 6-10 to 6-17 provides a comparison by vehicle type for the increase in overall county wide traffic for the various 2026/2036 AM/PM assignments with and without demand adjustment compared to the 2016 base. This information needs to be presented for Ipswich in order to properly assess the impacts of the CS and the feasibility of modal shift by vehicle type for Ipswich.

#### WSP/ Suffolk County Council ISPA Forecasting Report Forecasts with demand reductions January 2020

The Demand Reduction Impact for Ipswich is reported in Tables 7 - 14 as follows:

- 28% Reduction in PCU. Hours Delay (AM 2026) – SCC Highway
- 29% Reduction in PCU. Hours Delay (AM 2026) - SCC Highway / SRN interface
- 26% Reduction in PCU. Hours Delay (PM 2026) – SCC Highway
- 23% Reduction in PCU. Hours Delay (PM 2026) - SCC Highway / SRN interface
- 28% Reduction in PCU. Hours Delay (AM 2036) – SCC Highway
- 7% Reduction in PCU. Hours Delay (AM 2036) - SCC Highway / SRN interface
- 30% Reduction in PCU. Hours Delay (PM 2036) – SCC Highway
- 22% Reduction in PCU. Hours Delay (PM 2036) - SCC Highway / SRN interface

These are clearly substantial reductions but there has been no scenario analysis or assessment of how realistic these assumptions and demand reduction impacts are. We believe this level of reduction will be extremely difficult to achieve and that evidence is required to verify this for the CS to be sound.

The AM Peak is defined as 08.00-09.00 and the PM Peak as 17.00-18.00 but road users already experience congestion either side of these times and also around 15.00-16.00 in certain parts of Ipswich due to school traffic/use of pedestrian crossings etc. Experience shows that there are signs of the evening peak running from 15.00-18.30 at certain junctions and road links, e.g. the A1214, to varying degrees. It is not clear how the transport modelling considers the implication of this and the impact of congestion outside of the peak times, this needs to be explored further for the CS to be found sound with regard to Transport. It is particularly important with regard to the potential for road users to alter their journey patterns outside of the model's peak times.

Tables 15, 17, 19 and 21 for SCC Highway in Ipswich including the demand adjustments show

5 Junctions with overall V/C ratio of 85%+ (AM Peak) in 2026
12 Over-capacity links with V/C ratio of 100%+ (AM Peak) in 2026
11 Junctions with overall V/C ratio of 85%+ (AM Peak) in 2036
42 Over-capacity links with V/C ratio of 100%+ (AM Peak) in 2036
2 Junctions with overall V/C ratio of 85%+ (PM Peak) in 2026
9 Over-capacity links with V/C ratio of 100%+ (PM Peak) in 2026
12 Junctions with overall V/C ratio of 85%+ (PM Peak) in 2036
44 Over-capacity links with V/C ratio of 100%+ (PM Peak) in 2036

Previous modelling (for the IGS planning applications) has shown that many junctions and links in Ipswich are already operating at/near capacity at peak times and will continue to get worse without the 15% assumed modal shift. Clearly it will be impossible to achieve 15% modal shift in Ipswich by 2023 (for example) especially as there are no current modal shift projects running in Ipswich.

Modelling work needs to show how congested Ipswich roads will be with the additional growth before 2026 with realistic, evidence-based levels of achievable modal shift. By applying a 15% modal shift reduction for the only years modelled, the modelling is hiding the fact that Ipswich roads are already heavily congested with many roads at capacity. There is no evidence that the CS is sound in relation to transport proposals in the years up to 2026.

We note that the Results Summaries are only provided with the full demand adjustments without a comparison with zero adjustment (or any levels in between). The impact of additional traffic either side of the AM and PM peaks also needs to be assessed for the CS to be found to be sound.

Section 3.9 IPSWICH RESULTS SUMMARY show that even with the high levels of modal shift and new infrastructure many junctions will be unacceptably congested. What the modelling does not show is that these junctions are ALREADY at or near capacity.

3.9.1. Several of the A1214 corridor junctions operate with an overall V/C greater than 85%.

- A1214 / Dale Hill Lane – approaching capacity in AM/PM peaks in 2036. [Although not stated we also note that the modelling shows this junction is approaching capacity in 2026.]
- A1214 / Henley Road –approaching capacity in 2036 AM/PM.
- A1214 / Westerfield Road – approaching capacity in 2036 AM/PM peaks.
- A1214 / Tuddenham Road – approaching capacity in AM peak in 2036.
- A1214 / Rushmere Road – approaching capacity 2036 AM/PM peaks.

3.9.2. V/C results show congestion in the AM and PM peak on Key Street/College St and St Helens Street / Old Foundry Road / Crown Street corridors in Ipswich town centre.

Figures 15 and 16 also illustrate the many links that reach capacity, most notably on most of the A1214 from the hospital to Bramford Rd and on surrounding roads most notably around the Ipswich Garden Suburb. Further modelling of these junctions and links at capacity at Peak times is required to assess the impacts throughout the day. If they remain congested for long periods, then clearly the CS cannot be found to be sound with regard to Transport and Air Quality.

We repeat our concerns that the modelling work shows greater than 100% capacity in both 2026 and 2036 on small residential roads such as Elsmere Rd and Dale Hall Lane as well as Park Rd, which are not designed for heavy traffic and have not been included in Air Quality Assessments. It is obvious that in 2026 air quality will be worsened on these roads, which is in breach of the CS and therefore unsound. We note that this level of excessive congestion is forecast even if high modal; shift rates are achieved etc.

The level of detail of the results provided in this report and published on the IBC website is far less than in the previous 2019 report and as Appendices A-C have not been included in the Evidence Base. These Appendices should be made available publicly prior to the Inspectors examination for analysis and to inform the proceedings.

4.4 IPSWICH MODELLING RESULTS states “4.4.1. Ipswich is highlighted as the location which benefits the most from the ISPA demand adjustments which have been applied. Ipswich experiences the highest proportional decrease in PCU Delay hours and reduction of junctions which show overall V/C issues. 4.4.2. Despite the significant benefits of the demand reductions, there are still various junction approaches along the A1214 corridor around Ipswich are shown to be over or close to capacity in both 2026 and 2036. Junctions in and around the Star Lane gyratory are shown to have capacity issues in both forecast years. Other junctions which show overall capacity issues include Nacton Road / Landseer Road and the St Augustine roundabout (Bucklesham Road / Felixstowe Road).” IBC has not provided any evidence how these issues will be resolved and without doing so the CS is not sound.

The Traffic modelling clearly needs to show in which year these junctions/routes reach these levels of congestion in order to plan properly for the delivery of the CS. From the results it is clear major new traffic infrastructure is required to resolve congestion on these routes and/or junctions in addition to those 12 projects already identified by SCC and assumed to be implemented.

We note that 4.7 SUMMARY 4.7.1. states “*The modelling detailed within this report is considered to be a robust basis which enables each of the LPAs to be able to test the transport impacts of the proposed housing and job growth within their respective emerging Local Plans.*” We agree that the modelling does test the impacts but do not believe that the modelling work is sufficiently robust to demonstrate that the CS is sound. We note that SCC does not go as far as saying that the CS policies in relation to accessibility and Transport are sound. In our view they are not sound, and IBC needs to provide further robust evidence that they are.

We also note that the traffic modelling excludes any construction and trades traffic involved with any of the new developments and consequently is not sound. Given the scale of development planned in and around Ipswich over the lifetime of the Plan, volumes of construction-related traffic are likely to have a material effect. This is particularly relevant to the roads around the IGS where the bulk of construction-related traffic will result given the proposed 3,500 homes and associated developments. The traffic modelling needs to include all traffic associated with the construction of the proposed new developments in the modelling work to be sound. In Ipswich, the traffic modelling also needs to include the impacts of any major sewage infrastructure works required for the new development, for instance Anglian Water’s proposed strategy is to upsize 330 metres length of sewer along Valley Road and provide 550 cubic metres of storage off-line storage under Valley Rd, which will require its closure for many months.

If this required traffic infrastructure cannot be delivered in a timely and effective manner before proposed development, then such development cannot be allowed to proceed as it would lead to severe congestion. A mechanism needs to be included in the CS to ensure that this cannot be allowed to happen for it to be sound.

POLICY CS20: KEY TRANSPORT PROPOSALS states that “*The menu of potential measures is set out in the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area (ISPA). A detailed action plan will be identified through the ISPA Board. Transport mitigation measures will be funded through developer contributions, Local Transport Plan funding, New Anglia Local Enterprise Partnership funding, the Highways England capital funding programme and bidding for other relevant funds.*” This is somewhat misleading as the Mitigation Strategy includes an Implementation Programme (admittedly one that lacks detail and proper cost assessment) which requires substantial funding, including from ISPA authorities, to deliver the required levels of modal shift to deliver Policy CS20 Transport.

Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area, August 2019

We are disappointed that the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area, August 2019<sup>31</sup>, clearly a key document, has not been included from the IBC New Evidence database. As we have only recently come across the document, we have not had sufficient opportunity to examine it in detail prior to the consultation deadline. We believe it is a key document for the Planning Inspector to consider in relation to the soundness of the Transport (and air quality) related aspects of the CS and should be assessed accordingly.

This includes an Implementation Programme for Phase 1 to 2026 with measures up to 2036 to be confirmed. SCC states “*It is anticipated that the phase 2 costs are likely to be greater than phase 1 as these will include linked roads and junctions within the town’s network*”.

Paragraphs 12.18.1 & 2. state that “*The focus of the implementation programme is to deliver mitigation within Ipswich to address the impact of cumulative growth identified in the ISPA planning authorities’ local plans. Recognising that this work will support the Local Transport Plan strategy for Ipswich.*” and “*Modal shift has been identified as the mechanism to mitigate the impacts of this growth. Trip rate adjustments were made within the SCTM model assessment to reflect a reasonable level of modal shift. This approach to trip reduction results, broadly, in a 9% shift to the background traffic and a 7% reduction to the new trips. The implementation programme focuses on measures that will deliver this level of modal shift*”.

However, the modelling work assumes reductions in Ipswich of

- around 15% (Table 6-4) in 2026 in existing car trips (with similar levels in 2036), and
- -12% AM 2026, -13% PM 2026, -11% AM 2036, -12% PM 2036 reduction in trips from new road users for 2way trips in Ipswich (Tables 6-6 to 6-9)

This level of modal shift seems to apply to ISPA as a whole whereas a far greater reduction is required for Ipswich. It is not clear that the full costs of this have been factored in. We question whether the proposed Implementation programme is sufficient to deliver the level of modal shift required in Ipswich assumed in the modelling work to deliver the CS and whether the CS is sound with regards to Transport (and hence air quality).

The evidence provided in Chapter 5 of the achievable levels of modal shift show that the required levels of modal shift for Ipswich are massively higher than the evidence base suggests is achievable or has ever been realised in the UK before. We note that the 2010 Sustrans Smarter Choices Project for Ipswich engaged with 12,000 households in a two-year period at a cost of £474,098. Overall it achieved a 11% car with single driver trip modal shift, but this was not sustained due to the lack of long-term engagement (Paragraph 5.2.13). It is important to understand that these levels of modal shift were achieved in summer months and there was no assessment of the levels in winter, when the number of cyclists reduces due to dark mornings/evenings and inclement weather. As 12,000 households is a sizeable proportion of total Ipswich households, this will make the modal shift targets even harder to achieve as many households will already have been targeted to change their mode of travel.

There are several reasons why these higher levels of modal shift are unlikely to be achieved in Ipswich – some of which are not specific to Ipswich. For example, the assumptions fail to consider that certain categories of workers cannot work from home and will need to use vehicles to in order to work most notably Tradespeople who use tools and carry equipment such as

31 <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/ISPA-Transport-Mitigation-v13F.pdf>

builders/constructors, gas & water engineers, painters, electricians, kitchen & bathroom fitters, tilers, roofers, gardeners, cleaners. The majority of these invariably travel at peak times. Another example is the growing numbers of care workers who support people to live in their homes. Unless SCC changes its school's policy in relation to choice, many parents will continue to use a vehicle to take and pick up their children from school, especially if parents also work.

Modal shift assumptions also fail to recognise the physical barriers within the town to cycling that have been identified by SCC in its draft LCWIP namely the hills, rail lines and river. Beyond the central core, routes travel uphill to the suburbs. The rail lines restrict route options to the south west of the town and it also severs routes to the north and east. In addition, the river limits north east - south west movements. In particular, many people will struggle to cycle up the steep hills out of Ipswich town. IBC needs to provide the Planning Inspector with sufficient evidence that these barriers can be overcome for the CS to be sound.

It is well known that the number of cyclists reduces in winter due to dark mornings/evenings and inclement weather, yet the modelling assumes the same levels of modal shift will apply throughout the year, which is clearly not going to happen. The modelling and modal shift assumptions are therefore unsound in this respect. IBC needs to provide evidence that extremely high levels of modal shift that have been modelled can be delivered in Ipswich by 2026 for the CS to be sound in respect of Transport and Air Quality.

Paragraph 5.4.5 states that “*Analysis has been undertaken to inform the Suffolk County Council’s Local Cycling and Walking Infrastructure Plan (LCWIP) using DfT approved tools the Walking Route Audit Tool (WRAT) and the Cycling Level of Service (CLoS). This has identified some key links for improvement.*” We are disappointed that this document has also not been added by IBC to its Evidence Base. Please refer to our earlier comments on this.

In order to increase the number of cyclists, people have to feel confident enough and safe to cycle. Yet there is no mention of developing and delivering free road-cycling courses based on national standards<sup>32</sup>. Without these it will be impossible to increase the number of cyclists to required levels even if there were substantial improvements in safer, dedicated cycling infrastructure.

Paragraph 5.5.1 states that “*Work on the walking and cycling strategy is ongoing. To date schemes have been identified to address existing gaps in the network. However, as part of the ISPA mitigation strategy implementation programme a review of the potential to introduce more ambitious measures would be undertaken, with focus on improving sustainable access to areas of employment.*” There does not appear to be much commitment to providing funding to delivering improved cycling infrastructure. Evidence is required that funding will be available for improved cycling infrastructure, training etc otherwise modal shift targets will not be achieved and the CS is therefore unsound.

In the Infrastructure chapter, Paragraph 9.24.1. states “*The provision of infrastructure needs to be considered for all workstreams in the transport mitigation implementation programme. It is intended that most improvements will manage capacity rather than significantly increase capacity due to physical constraints on the Ipswich highway network.*” This statement gives no confidence that there will be much investment in improving cycling infrastructure to increase capacity. As mentioned earlier it is not clear what infrastructure the Transport Mitigation Strategy. This needs to be made clear to the Planning Inspector for the CS to be sound.

The estimated cost of delivery of mitigation of the lower level of modal shift for ISPA as a whole to

32 □

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/769891/national-standard-cycling.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/769891/national-standard-cycling.pdf)

2026, phase 1, is summarised in Table 24, copied below. It is worth noting that modal shift does not happen overnight, as it requires a major change in behaviour, but over a period of many years – this does not seem to have been factored in. To have even the remotest of chances of achieving the extremely high modal shift levels required then investment needs to be made now, especially in infrastructure projects which obviously include planning and build times on top of the length of time to deliver behavioural change. The long lead times of infrastructure based behavioural change projects appears not to have been factored in.

Table 24 – Phase 1 cost estimate

Workstream Range of costs to 2026

Monitoring	500,000	700,000
Smarter Choices & QBP project team	2,300,000	2,500,000
Incentives, including bus route subsidy	4,440,000	5,000,000
Parking review	100,000	200,000
Infrastructure	16,000,000	20,000,000
Technology	incl	tbc
Total	23,340,000	28,400,000

We note that Technology costs remain to be confirmed. SCC state “*The use of technology will be considered for all mitigation measures and improvements, especially where it will provide a cost-effective mechanism to deliver the implementation programme and improve modal shift.*” It is clear that Technology costs are likely to be significant. These urgently need to be costed with funding agreed by the relevant authorities for the CS to be found to be sound.

The apportionment of costs by Local Planning Authority is defined in Table 22 below:

Table 22: Trips In/Out of Ipswich

LPA	% trips
Ipswich Borough Council	45
Suffolk Coastal District Council	28
Babergh District Council	14
Mid Suffolk District Council	13

Chapter 11 Funding sources does not inspire confidence that sufficient funding is available, and that Authorities have committed to providing their share. We note that IBC’s FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS allocates no money at all for modal shift measures. Evidence needs to be provided that sufficient funding is guaranteed, and that each Authority has committed to providing its share of the required funding to deliver the proposed 9% shift to the background traffic and 7% reduction to the new trips. Although this is still far lower than the approximate 15% and 12% reductions the modelling work assumes will happen in Ipswich.

For the CS to be sound an Implementation Programme needs to be included in the CS costed and agreed to be funded by all Authorities that delivers the higher levels of modal shift required to be achieved in Ipswich by 2026. Assurances for funding of the required Phase 2 measures from authorities should also be required for the CS to be sound.

As we have previously stated, there is a single assumption that these levels of modal shift will be delivered, without any scenario modelling e.g. at 25%, 50% and 75% success rates. How will IBC deliver the CS if these unprecedented levels of modal shift are not achieved? Currently Ipswich Borough Council has not provided sufficient evidence that the required levels of modal shift required in Ipswich are achievable or that it has the funding in place to deliver them for the CS to be found to be sound.

**Parliamentary Transport Committee report Active travel: increasing levels of walking and cycling in England in July 2019<sup>33</sup>.**

Section 32 recommends that “any revised Cycling and Walking Investment Strategy include targets for getting people to switch from driving to active travel. These targets should be based on the number of journeys made by car, foot or bicycle for journeys of less than 1, 2, 5 and 10 miles.” The Government should set modal shift targets for 2025 and 2040, to align with the targets it sets for increasing levels of walking and cycling. These should be at a level that ensures England meets—at the very least—the Committee on Climate Change’s assumption that there will be a 10% transport modal shift by 2050. Local authorities should be encouraged to set local targets for modal shift as part of their Local Cycling and Walking Infrastructure Plans”. Clearly IBC needs to include modal shift targets in the CS for it to be sound. Whilst we believe that modal switch will be easier in a town than across the UK, it is unbelievable to expect that 15% modal shift can be achieved in 2026. If the Committee on Climate Change is assuming that 10% modal shift targets (over 30 years) are appropriate for the UK in 2050, IBC needs to provide the evidence that it can achieve over 50% higher modal shift in just 6 years (80% lower time frame)? Where is the evidence that IBC can deliver these far higher levels of modal shift in a substantially shorter time frame for the CS to be sound?

**Suffolk's Local Transport Plan 2011 - 2031**

We also note that SCC's Suffolk's Local Transport Plan 2011 - 2031<sup>34</sup> seems to be the most recent version available. This is split into two parts and outlines SCC's objectives for transport:

- Suffolk's Local Transport Plan - Part 1 (PDF, 1MB) is a 20-year strategy that highlights the council's long-term ambitions for the transport network.
- Suffolk's Local Transport Plan - Part 2 (PDF, 5MB) is a four-year implementation plan indicating how the council are proposing to address the issues identified within the longer-term transport strategy.

There is no updated version of this in the IBC Local Plan Evidence Base or on the SCC website. A publicly available current Implementation Plan showing how SCC will provide funding to address the key transport issues and the levels of modal shift required to deliver Ipswich Borough Council's CS does not appear to exist. Without this Ipswich Borough Council is unable to provide sufficient evidence that it can deliver Policy CS20 and therefore the CS is unsound.

As previously stated we are not aware of any major improvements to existing cycle routes on the existing road network in Ipswich since that approval of the current CS. IBC needs to provide evidence of what improvements have been made and are planned for existing road network in order to deliver the high rates of modal shift (and lower trip rates) that the traffic modelling uses. Without the provision of supporting evidence lower modal shift rates and higher trip rates should be adopted in the modelling work.

33 <https://publications.parliament.uk/pa/cm201719/cmselect/cmtrans/1487/1487.pdf>

34 <https://www.suffolk.gov.uk/roads-and-transport/transport-planning/transport-planning-strategy-and-plans/>

## **Paragraph 8.220**

There is clear evidence that poor air quality does detriment on health. This needs to be amended to read "Air Quality Management Areas are designated in areas where poor air quality will have an effect on people's health". Failure to recognise this undermines the soundness of the Plan.

## **Policy DM1 Sustainable Construction**

At the Executive meeting 9<sup>th</sup> July 2019 Ipswich Borough Council Declared a Climate Emergency and will begin working to become carbon neutral by 2030. Policy DM1 needs to be updated to include this commitment and then strengthened to ensure that the CS delivers carbon neutrality of the Council by 2030 for it to be sound. New build homes built by the Council will have to be zero carbon for this to happen and the Council should require other developers to do likewise. This would be consistent with the Court of Appeal's ruling on 27/02/20 that the government's Heathrow's expansion decision was unlawful because it did not take climate commitments into account.

## **Policy DM2 Decentralised Renewable or Low Carbon Energy**

This policy also needs to be updated and strengthened to incorporate the declaration of a Climate Emergency. The energy requirements of new build homes built by the Council will have to be zero carbon for the Council to become carbon neutral by 2030. The Council should require other developers to do likewise.

## **Policy DM3 Air Quality**

We support the strengthening of DM3 from the previous draft version of the Plan, which was hopelessly weak and ineffective. However there remain major flaws in IBC's approach to improving air quality which mean the CS is unsound.

The Core Strategy Adopted December 2011 Paragraph 9.95 states "*With the levels of growth proposed for the town coupled with the fact the town already has three Air Quality Management Areas it is felt essential that air quality impacts and mitigations are fully addressed.*" Paragraph 8.201 of the current CS states "*There are, in addition, four Air Quality Management Areas (AQMAs) within the central area of Ipswich, as a result of pollutants from road traffic.*" There are now five AQMAs in Ipswich. This increase from three to five AQMAs is simply not acceptable given the strong clear evidence of the detrimental impacts on human health. Clearly IBC is not doing enough to improve air quality and must do more for the CS to be sound.

NPPF 181 suggests planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. The CS needs to make a clear commitment to improving air quality in Ipswich and compliance with legally binding air pollution targets for the CS to be sound.

In relation to DM3 Topic Paper: Air Quality, Transport and Green Infrastructure Paragraph 20 states that "*the Council has given consideration to the Government's Clean Air Strategy 2019 and exercised its duty under the Environment Act 1995, and DEFRA's Local Air Quality Management Policy Guidance LAQM.PG16, (4) with the preparation of a draft Air Quality Action Plan (AQAP) and this too has been through a phase of public consultation leading to its (likely) adoption in 2019*". We note that this has now been adopted without taking any notice of most of the criticisms made by consultees.

Paragraph 51 states “*The Local Plan Review Preferred Options sit alongside the Council’s draft Air Quality Action Plan which looks beyond planning at other measures including corporate measures that can be put in place to improve air quality. The Council’s AQ action Plan will be scrutinised by DEFRA, having been subject to public consultation in late 2018.*” IBC needs to confirm that this has happened and provide the results of the examination to help demonstrate the CS is sound.

Defra’s template guidelines for the Air Quality Action Plan require firm, time bounded actions that **will deliver** a reduction in air pollution in the five AQMAs. However, IBC fails to follow Government’s guidelines and chooses to water down Government requirements. Ipswich Borough Council fails to make the required firm commitment in its AQAP to delivering any reduction in air pollution nor does it set out when it will deliver actual improvements in air quality or specifically how it will do this. In our opinion the AQAP is therefore non-compliant with Government requirements and shows a lack of commitment from IBC to improving air quality in Ipswich in breach of its legal duty to do so. This is clearly to the detriment of residents who consequently suffer from higher incidents of poor health and respiratory disease especially in and around the AQMAs. The HRA fails to take into account the non-compliance of the AQAP with Government guidelines.

The WSP Source Apportionment Study (dated June 2018) supported IBC’s AQAP. However, this study is flawed and under-estimates NOx emission levels.

1. The Source Apportionment Study was undertaken for AQMA No.2 (the junction of Crown Street with Fonnereau Road, St. Margaret’s Street and St. Margaret’s Plain) and AQMA No.5 (Matthews Street/Norwich Road between the Civic Drive roundabout and Bramford Road).
2. ANPR cameras were deployed at two roadside count points located on the A1156 in Ipswich to gather detailed information on the local vehicle fleet. Measurements were conducted over a twelve-hour period each day starting at 07:00 on 27th (Friday), 28th (Saturday) and 30th (Monday) April 2018. One of the two ANPRs (in AQMA2) failed at 14.00 Monday (missing the Monday evening peak).
3. Speeds were only measured for the Friday and Saturday and used in the calculation of the vehicle NOx emission rates for these two days. The averages of the hourly measurements made on both days were used to calculate the vehicle NOx emission rates for the 30th April. The report states that traffic speeds were higher on Saturday (somewhat obviously). Other UK traffic flow studies show that Friday traffic volumes in general tend to be lower than other weekdays (as more people like to work from home on a Friday and some sectors tail off ahead of the weekend). Friday evening peak traffic is also lower than other weekdays as people leave work earlier and there are less after-school activities and hence fewer associated traffic movements. We are dismayed that there was no speed measurement between Monday and Thursday, which would have given a more accurate representation of pollution levels. It is also worth noting that more vulnerable schoolchildren are mainly impacted on weekdays for obvious reasons.
4. The report states the obvious in that "Analysis of the NOx emissions shows that they were inversely proportional to vehicle speed, as shown in Figure 7. This means that lower vehicle speeds will give rise to higher emissions, for example during congested periods at peak rush hour time, in addition to the increase in emissions associated with increases in vehicle number." So, the report underestimates Monday's emissions (and hence Tues, Weds, Thurs) and thereby under-estimates what additional measures will be required.
5. At the end of the 2-day measuring period of the two pneumatic strips measuring speeds was found to be loose. The report acknowledges that "this may have caused inconsistencies in the traffic flows and/or directional assignment measured during the traffic survey" i.e. the results are unreliable and hence the report is further flawed.

We note that Paragraph 47 of the Topic Paper states that “Air Quality modelling was completed in 2016 in relation to locations identified for future development under the Ipswich Core Strategy and Policies Development Plan Document Review, and Ipswich Site Allocations and Policies (Incorporating

IP-One Area Action Plan) Development Plan Document (the Ipswich CS, 2017)". We believe that this work assumed the Upper Orwell Crossing project would proceed and as this has been cancelled is therefore obsolete. It excluded all emissions arising from construction including construction traffic and tradespeople journeys. It also failed to assess the multi-site build out of the IGS and air pollution levels in the early years of the IGS build. New Air Quality modelling work needs to address these issues and focus on air quality levels in the first 10 years of development, when they are likely to be at their highest levels (before European vehicle emission standards deliver expected emission reductions).

We note that there is no Air Quality assessment provided as part of this consultation, which is unacceptable (although they are planned). We reserve the right to comment on this when it is available and request that IBC notify and consult with us when this work has been released. Whilst we agree with the areas to be assessed identified in the WSP Screening Report January 2020, we disagree with just the two reference years of 2026 and 2036 being used and argue that an earlier year, such as 2023 (being the midpoint between 2020 and 2026. The reason is that by 2026 tighter vehicle emission standards should be delivering improvements and that it is the early years of the CS period when emissions could be at their most dangerous and greater action required to prevent premature deaths. It is completely pointless using 2036 when considering the 2035 (at the latest) ban on petrol, diesel and hybrid vehicles, which will obviously have a major impact many years before this date. We note that the screening assessment uses the SCTM traffic forecasts, which exclude any form of construction traffic. The air quality assessment needs to include emissions from construction traffic and construction otherwise the assessment and hence the CS will be unsound. We note that the SCTM assumes high levels of modal shift without sufficient evidence that this is achievable. Sensitivity testing of different rates of modal shift is therefore required in the assessment for it to be considered sound.

We support the revised draft Policy DM3 of the CS, which states that "Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan." This has not been done for the IGS development (see below) and needs to be undertaken as a priority before building works be allowed to commence. We also note Paragraph 9.3.5 states that "The AQA should also consider wider cumulative impacts on air quality arising from a number of smaller developments". In our view that the multi-site build out of the IGS needs to be assessed in a new AQA. The HRA fails to assess the non-compliance of the AQA for the IGS with DM3 and needs to assess this accordingly.

Paragraph 1.2 IBC's AQAP confirms the use of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments (Appendix 2). However, the IBC Planning Department is currently not implementing the Guidance in the way it needs to be in order to improve Air Quality in Ipswich. This is especially pertinent considering the proposed expansion of Ipswich detailed in the CS. This urgently needs to be corrected for the revised CS to be sound. When assessing the Planning Applications in relation to Land To South Of Railway Line, Westerfield Road IP/14/00638/OUTFL and Land to the North of the Railway Line and East of Henley Road 16/00608/OUT the Air Quality guidance was ignored in relation to Sections 6.22 and 6.23 (see Appendix 2). No Air Quality Assessment was undertaken for either application that assessed the impact of construction and construction traffic on Air Quality nor was there an Air Quality assessment carried out for the first year of occupation of any of the phased developments, when there will also be considerable construction traffic as well as substantial additional traffic from the new homes. This raises four key questions that need to be answered by IBC when assessing the soundness of the CS Preferred Options.

- Question 1 Why has the Council chosen to ignore the Guidelines it has adopted and decided not to assess the impact of emissions from construction and associated construction traffic on Air Quality for these IGS sites?

- Question 2 Why has the Council chosen to ignore the adopted Guidelines and chosen not to assess air quality emission for the first year of each phase (when there will also be emissions from the construction of other phases that are being built in parallel)?
- Question 3 How can the Council assess whether these developments “will compromise or render inoperative the measures within an Air Quality Action Plan, where the development affects an AQMA” as required by Section 6.22 of the guidelines?
- Question 4 How can IBC demonstrate compliance with Policy DM3 in the early years of the IGS development, when considering construction traffic and sewage infrastructure works?

In our view the IGS is non-compliant with Policy DM3.

This is particularly pertinent as much of the construction traffic will pass through AQMA 1 and 4 with tradespeople also travelling through AQMAs 2 and 5 as well. Consequently, IBC is currently failing to properly assess the impacts of the construction and related traffic from the IGS development in the early years of the build out on air quality in Ipswich. It has not assessed whether these developments will compromise the current version of the draft Plan, nor the Air Quality Action Plan.

We cannot find any air quality assessment in relation to rail transport or to shipping at the Port of Ipswich, with both forms of transport increasing. This is a major gap in the evidence base that risks rendering the CS unsound especially as ISPA plan to increased capacity on railway lines for freight and passenger traffic (Policy ISPA2 Strategic Infrastructure Priorities f)). AQ assessments are required for:

- The Port of Ipswich (which is included in the Screening assessment study area),
- the Ipswich Chord and Freight yard, where diesels regularly sit idling emitting pollutant clouds,
- additional freight to and from Port of Felixstowe (Felixstowe-Nuneaton upgrade), we note that rail freight is planned to increase by 50% and the number of trains by 30%, and
- additional freight in relation to the construction of Sizewell C.

We are not arguing against growth, but simply advocating the impacts of air quality need to be properly assessed so that mitigation action can be taken where required. Without this the CS is unsound.

The HRA also fails to consider train and shipping emissions, which need to be included in the HRA especially as shipping will clearly impact on the Orwell Estuary, which is part of a Special Protection Area (SPA) and Ramsar site. We note that the DfT Port Air Quality Strategy (under the Defra Clean Air Strategy , 14 January 2019) applies to ports with cargo greater than 1million tonnes, which would appear to include the Ipswich Strategic Harbour Authority.

We note that the Council failed to apply for any funding under the Clean Air Fund by the November 2018 deadline for projects that are to commence from March 2019. As the Council has no evidence basis or costings for any of its proposed projects in its AQAP, it will not be eligible for future Clean Air Funding. This clearly begs the question how will IBC fund the projects that it has identified in the AQAP as needed to reduce air pollution? We also note that IBC's FINANCIAL STRATEGIES AND MEDIUM TERM FINANCIAL PLAN 2020/21 ONWARDS allocates no money at all for improving air quality despite being the responsible authority for doing so. IBC needs to provide evidence that it will be able to finance and deliver its AQAP for the CS to be sound.

## **DM8 Natural Environment**

Please see our comments under Policy CS4.

## **DM20: House in Multiple Occupation**

We support the new Policy 20 as a pragmatic and sensible response to an increasing issue in Ipswich.

## **DM21: Transport and Access in New Developments**

We strongly object to the removal of the reference to traffic capacity and rights of way in

- a. *not result in a severe adverse impact on rights of way or the local road network in respect of traffic capacity and highway safety;*

The references to “rights of way or the local road network in respect of traffic capacity” needs to be reinstated as walking and cycling rights of way should not be reduced and as traffic congestion is already a major problem in Ipswich and should not be negatively impacted on by local new developments. The proposed changes conflict with CS5 Improving Accessibility and renders the CS unsound. We support the change in relation to highway safety.

We support the requirement of

- b. *not result in a significant detrimental impact on air quality or an Air Quality Management Area and address the appropriate mitigation measures as required through policy DM3*

but note that the IGS development is currently non-compliant as it failed to assess the impacts of the development on air quality in accordance with DM3. A revised assessment of air quality impacts of the IGS is urgently required before building can commence and the revised CS can be found to be sound.

It remains unclear how ‘severe’ and ‘significant’ impacts are defined. These need to be clearly defined in the CS. In the case of air quality, there are maximum legal limits for particulates and nitrous oxides, and it would be appropriate for ‘significant’ to be defined as the legal limit.

## **Chapter 10 Implementation**

Tables 8A and 8B needs to include the required specific junction improvement projects, estimated cost and a date by which they are required to be delivered in accordance with the transport modelling assumptions for the CS to be sound.

Table 8A omits the technology costs that will be required to deliver as stated in Table 24 of the SCC Transport Mitigation Strategy. This needs to be included for the CS to be sound as modal shift targets will not be delivered without new technology.

Table 8A needs to clearly identify that substantial funding will be required for sustainable transport measures in Ipswich and infrastructure to support them after 2026 and that the level of funding will be greater than that required up to 2026 as identified in the SCC Mitigation Strategy.

The Link road through site IP029 via Europa Way from Bramford Road to Sproughton Road identified in Table 8A has been included in the SCC Modelling assumptions and therefore must be considered as a requirement. If not, the modelling is unsound and needs to be repeated without this link road. We note that in response to the creation of the Suffolk County Council taskforce to improve Ipswich traffic David Ellesmere is quoted in the East Anglian Daily Times as demanding “a new link road connecting Europa Way with Bramford Road to alleviate traffic pressures, and work to explore a new road link connecting London Road, Hadleigh Road and Sproughton Road”.

## **OBJECTIVE 5: Air quality**

We strongly object to the removal of the current Objective to improve Air Quality which in relation to the five AQMAs is a legally binding requirement. We also note that the Planning Inspector specifically requested the inclusion of this indicator in the last review of the current CS. The existing indicator of the “Number of recorded air quality exceedances.” Needs to be retained and reported on. We support the inclusion of an air quality objective but believe this should be to reduce air quality emissions to legally binding limits by a specified date for example within 3 years.

As mentioned previously. It is not clear what the 2004 levels are or how progress against these will be measured; 2004 emissions levels should be included in the CS for completeness so that the target is clear. For example, do 2004 measuring locations correspond with the current measuring locations and if not, how will IBC determine whether levels have returned to 2004? Furthermore, it is not clear when IBC aim to return to 2004 levels. This needs to be done as a matter of urgency and should not be left to 2036 as would be possible under the current Plan, by which time many more Ipswich residents will have died prematurely.

An Objective of “Every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels” does not go far enough. Limiting this to an “aim” provides a massive caveat to the Objective. Also, how will the Council determine that EVERY development has contributed?

## **OBJECTIVE 6: Transport and connectivity**

Given the distinct lack of progress in cycling infrastructure an additional indicator is required to measure improvements, especially in relation to the development of new/improved comprehensive, integrated cycle routes.

As identified above, IBC needs to start taking more positive actions to Improve Accessibility as it is currently non-compliant with CS5. Closer scrutiny of IBCs approach to Improving Accessibility is clearly required and additional Objectives/measures are required to monitor and assess progress on Improving Accessibility in the CS to help ensure IBC comply with CS5 in future.

### **IPSWICH LOCAL PLAN REVIEW 2018 - 2036 INTERIM SUSTAINABILITY APPRAISAL REPORT Strategic Environmental Assessment and Sustainability Appraisal October 2019**

A key problem with the Sustainability Appraisal (SA), Habitats Assessment and Health Impact Assessment, are that they simply assume that the CS will be fully implemented and that full funding for all the measures identified in the CS will be secured. In particular, there is no evidence that IBC (in conjunction with SCC) can deliver the substantial improvements in walking, cycling and bus infrastructure, improved road infrastructure and the project required to deliver the unprecedented levels of modal shift required for the CS to be sound. IBC and SCC's track record in these areas is dire with no evidence provided by IBC that this will change. There has been an increase in AQMAs and traffic with little real improvement in cycling or walking infrastructure and a major deterioration in bus services e.g. the closure of the Norwich Rd Park and Ride Scheme and reduction in rural bus services into Ipswich. The failure of Travel Ipswich (Ipswich Fit for the 21<sup>st</sup> Century)to deliver modal shift and the Upper Orwell Crossings project illustrate the problems facing IBC.

In our opinion it is too early to fully comment on the Report for several reasons, including:

- No SA of IBCs non-compliance with Sections 6.22 and 6.23 of guidance from Environmental Protection UK (EPUK) and the Institute of Air Quality Management (IAQM) for air quality assessments of the IGS proposed developments regarding construction traffic and assessment of the early years of the development.
- No SA of IBC's non-adherence to Government Guidelines for IBC's own Air Quality Action Plan in relation to the IGS and the Plan. No consideration that the CS does not comply with legally binding air quality targets.
- No SA of the air quality modelling/assessment of road traffic (as this has not been done yet).
- No SA of the omission of emissions from construction and traffic associated with construction of the IGS.
- No SA of the ability to meet the unprecedented levels of modal shift required for the CS to be sound (as identified in the transport modelling and SCC Transport Mitigation Strategy) and no assessment of what happens if the targets are not achieved.

- No SA of the lack of sewage infrastructure plan/proposals for the IGS and ISPA and SA of the environmental impacts of delivering new sewage infrastructure required for Ipswich, including emissions and impact of traffic congestion arising from the required foul water construction works.
- No SA of air quality or noise assessment in relation to rail transport most notably for the Ipswich Chord and Freight yard, where diesels regularly sit idling, emitting pollution and additional freight to and from Port of Felixstowe,
- No SA of the environmental impacts of the Port of Ipswich.
- No assessment of the potential impacts of increased freight traffic on the IGS pedestrian bridge and Westerfield rail crossing (including impacts on traffic delays).
- No SA of the decision to destroy the Green Rim by building homes on the Humber Doucy Lane part and re-designating it as Green Trails.
- The apparent lack of a full appraisal of the impacts on building on land at Humber Doucy Lane in the north east.
- No SA of the alternative of using land reserved for Retail and Car Parking in the town centre, which we believe is surplus to requirements, instead of building on Humber Doucy Lane.
- No SA of the omission of the incorporation of IBC's declaration of Climate Emergency into the Plan.

An updated SA is required to consider all these issues and consulted upon accordingly for the CS to be properly examined and progressed accordingly. Until the SA addresses these issues the CS cannot be deemed sound. We reserve the right to comment on the SA as it is developed.

### **Habitats Regulation Assessment (HRA)**

Please see our opening comments in relation to the Sustainability Appraisal, which apply to the Habitats Regulation Assessment.

The HRA is currently incomplete and needs to address the following impacts of :

1. The proposed re-designation of the Green Rim.
2. The new sewage infrastructure that will be required to deliver the housing and employment targets.
3. The required traffic infrastructure identified by the traffic modelling to improve the road network to allow the sustainable delivery of the CS (summarised above).
4. The non-compliance of the IGS AQA with DM3.
5. Emissions from rail and shipping.

If no such assessments are included in the HRA then the HRA needs to explain why they have been omitted.

IBC's response<sup>35</sup> to the Habitat Regulation Assessment (HRA) recommendations in relation to Paragraph 1.29 is not acceptable. This recommendation states "*In order to make ecological networks and wildlife sites capable of future resilience, there is a need for more wildlife sites, and that existing networks need to be bigger, better and more connected.*" The CS needs to be strengthened to ensure compliance with this recommendation especially as IBC's proposal to re-designate the Green Rim (which has not been assessed by the HRA) is clearly detrimental to this requirement.

It also needs to assess whether the lack of S106 payments for RAMs mitigation from the two IGS sites that received outline planning permission in February 2020 is acceptable as discussed earlier.

### **Health Impact Assessment**

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<sup>35</sup> [https://www.ipswich.gov.uk/sites/default/files/response\\_by\\_ibc\\_to\\_the\\_habitat\\_regulation\\_assessment\\_jan\\_2020\\_0.pdf](https://www.ipswich.gov.uk/sites/default/files/response_by_ibc_to_the_habitat_regulation_assessment_jan_2020_0.pdf)

Please see our opening comments in relation to the Sustainability Appraisal, which apply to the Habitats Regulation Assessment. The Health Impact Assessment fails to take into full account the removal of the Ipswich Green Rim, the non-compliance with legally binding air quality targets, emissions from construction, port and rail activities and the failure to include recognition of the Climate Emergency into the Plan.

Brian Samuel

Submitted on behalf of the Northern Fringe Protection Group<sup>36</sup>

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36 The Northern Fringe Protection Group (NFPG) is making this representation on behalf of its members and other residents who have authorised the NFPG to represent them. A list can be supplied on request.

## **Appendix 1 Evidence that the Green Rim should not be reclassified as Green Trails**

- Ipswich Local Plan November 1997

This makes specific reference to 9 green corridors (A-I) in Chapter 3. Paragraph 3.12 states “*These green spaces offer the opportunity to form corridors linking the inner parts of the Town with the surrounding countryside, visually and by providing access on foot or by cycle. These corridors are indicated on Plan No 1.*”

NE2 also states that “*The protection of the landscape quality and character of the countryside \*including the Area of Outstanding Natural Beauty (AONB) will be a prime consideration and proposals for irreversible development which is not required for the efficient operation of agriculture, forestry and recreation will not be permitted in the countryside as indicated on the Proposals Map unless there is an overriding case for a rural location.*”

It is clear it is the intention that the green corridors will provide access on foot or by cycle to the surrounding countryside and it is this countryside that was intended to form the green rim of Ipswich.

- Ipswich Core Strategy and Policies Development Plan Document December 2011

Chapter 7: The Key Diagram references (v) The green corridor and green rim approach to strategic green infrastructure (Policy CS16); The green rim almost completely covers the Ipswich Borough Council boundaries, which essentially reflects the countryside in the 1997 Proposals Map.

POLICY CS16: GREEN INFRASTRUCTURE, SPORT AND RECREATION Paragraph 8.175 states “*As the Borough grows, it is essential to protect, enhance and extend the network of open spaces, green corridors, and sports and recreation facilities. This is important in order to: allow people access to green space and nature; strengthen ecological networks that enable wildlife to migrate more easily around the town; link inner and outer parts of the Borough by providing walking and cycling routes;*”

*It will do this by [a number of means including]  
f. working with partners to improve green infrastructure provision and link radial green corridors with a publicly accessible green rim around Ipswich;*

It is clear the December 2011 Plan continues the concept of the green corridors providing walking and cycling routes to access the green rim and that the green rim was not intended for this purpose. We note that there remain 9 green corridors in the 2011 Plan as there were in the 1997 plan.

The green rim on the 2011 Key Diagram (pg 30) is very much larger than that in the current Key Diagram and clearly illustrates that the concept of the green rim is to protect the countryside on the perimeter of Ipswich Borough. It is also clear the Green Rim has been decimated beyond its original intention.

- Ipswich Core Strategy and Policies Development Plan Document February 2017

Diagram 3 of the Plan (pg 24) and the associated Plan 6

[https://www.ipswich.gov.uk/sites/default/files/plan\\_6\\_green\\_corridors\\_-\\_adopted\\_feb\\_2017.pdf](https://www.ipswich.gov.uk/sites/default/files/plan_6_green_corridors_-_adopted_feb_2017.pdf) shows that 9 green corridors remain and illustrates the green rim (which has shrunk from the previous Plan).

CS 16 states that “The Council will safeguard, protect and enhance biodiversity and the environment by working in partnership with others to ensure that our parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefitting the whole community. The Council will enhance and extend the ecological network and green corridors, open spaces, sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk. It will do this by:

g. working with partners to improve green infrastructure provision and link radial ecological networks and green corridors with a publicly accessible green rim around Ipswich;”

This continues the concept that it is the green corridors that provide the links to the green rim.

- Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, Suffolk Coastal District Council and Suffolk County Council  
Statement of Common Ground in relation to Strategic Cross Boundary Planning Matters in the Ipswich Strategic Planning Area Version 3 – December 2018

Section I Annex - Cross Boundary Infrastructure Requirements - Green Infrastructure pg 25 references the Infrastructure requirement for “Creation of ‘green rim’ around Ipswich” in accordance with the Update to the Haven Gateway Green Infrastructure Strategy for the Ipswich Policy Area (August 2015), Ipswich Borough Council Local Plan Review Preferred Options (November 2018) policy ISPA4 Cross Boundary Working to Deliver Sites and CS16 green Policies ISPA4 and SCLP12.24 require development to contribute to the creation of the ‘green rim’. This is clearly categorised as “Green Infrastructure” and not as “Transport Infrastructure”.

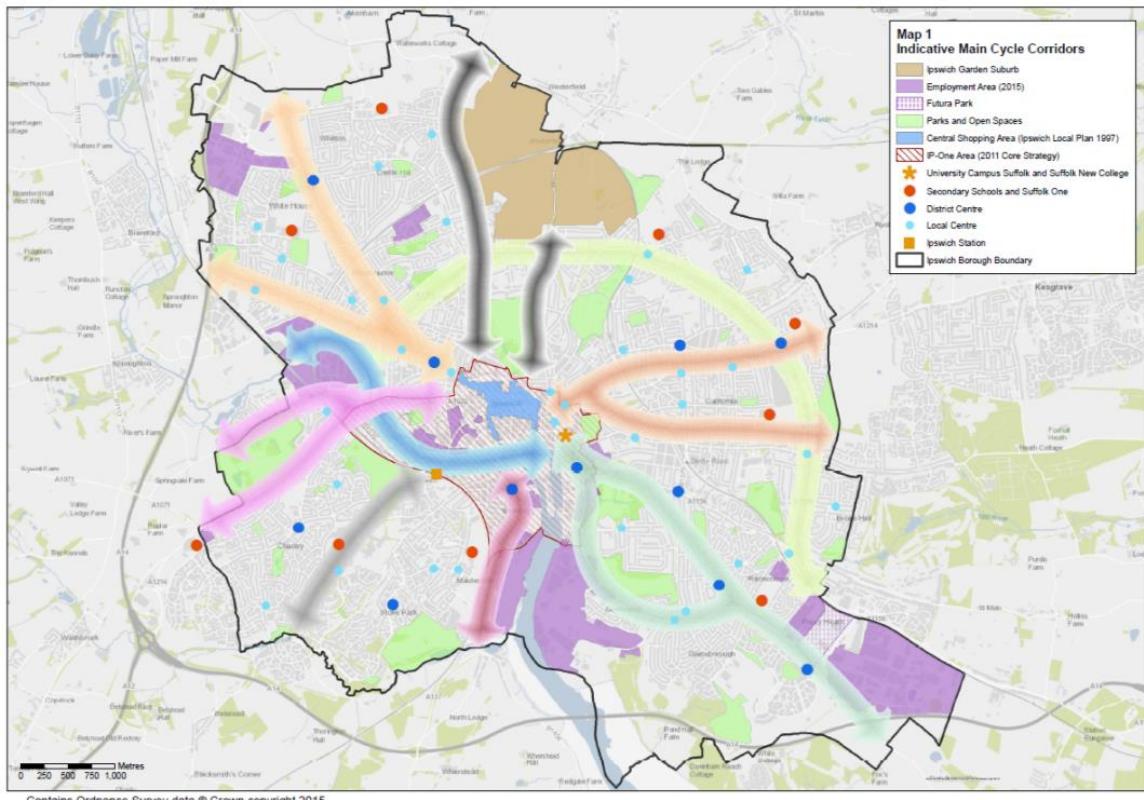
- Comparison of cycle routes and the proposed green trails in the Key Diagram

When cross-referencing the current Key Diagram and green trails with the Ipswich cycle map <http://www.greensuffolk.org/assets/Travel-Plans/Documents/Cycling/IpswichCycleMap.pdf> we have the following observations:

1. A green trail clearly suggests a “route”, but the Key Diagram map shows a green area.
2. Under no stretch of imagination would one call a road used by motor vehicles a green trail.
3. No cycle route through the Chantry Park part of the green trail.
4. No cycle route at all through the Humber Doucy Lane stretch of the green trail.
5. No cycle route through the Purdis Heath part of the green trail.
6. No cycle route through the Rushmere Heath part of the green trail.
7. No green cycle route other than Thurlestone Lane in the green trail above Whitton
8. No cycle route in the green trail between Ipswich and Westerfield.
9. No cycle routes through the Pipers Vale and Ravenswood other than a small dead-end stretch in the former and a looped cycle path around Ravenswood housing estate, which is hardly green.

- The Ipswich Cycling Strategy Supplementary Planning Document March 2016

This does not identify any of the Green Rim as cycling corridors as summarised in Map 1 Paragraph 6.12 reflects the Key Diagram. This clearly shows that the Green Rim was never intended as cycle routes and should not be reclassified as Green Trails.



- [Settlement Sensitivity Assessment Volume 1: Landscape Fringes of Ipswich July 2018<sup>37</sup>](#) Jointly commissioned by Ipswich BC and neighbouring authorities

Pg 11 refers to the Green Rim in the context of the Ipswich Key Diagram stating “this green rim is intended to provide an ecological corridor and a recreational resource”. There is no reference to “trails” and if this was the intention one would have expected IBC to correct this reference as it is fundamental to the report.

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<sup>37</sup> <https://www.ipswich.gov.uk/sites/default/files/settlement-sensitivity-assessment-july2018.pdf>

## **Appendix 2 Extracts from The Institute of Air Quality Management and Environmental Protection UK guidance**

**6.22** The report prepared detailing the results of the assessment should contain the following information (but not necessarily in this order):

*j. Description of construction phase impacts.* These impacts will relate primarily to dust emissions, which give rise to dust soiling and elevated PM10 concentrations, although construction plant and vehicles may need assessment. The assessment should take into consideration the likely activities, duration and mitigation measures to be implemented. The distance over which impacts are likely to occur and an estimate of the number of properties likely to be affected should be included. This assessment should follow the guidance set out by the IAQM31m.

*Summary of the assessment results.* This should include:

- Impacts during the construction phase of the development (usually on dust soiling and PM10 concentrations);
- Any exceedances of the air quality objectives arising as a result of the development, or any worsening of a current breach (including the geographical extent);
- Whether the development will compromise or render inoperative the measures within an Air Quality Action Plan, where the development affects an AQMA.

**6.23** Most assessments are carried out for the first year of the proposed development's use, as this will generally represent the worst-case scenario. This is because background concentrations of some pollutants are predicted to decline in future years, as emissions from new vehicles are reduced by the progressive introduction of higher emissions standards. Where development is phased, however, it may also be appropriate to assess conditions for the opening years of each new phase.

**From:** Claire Sawyer  
**Sent:** 21 January 2020 22:47  
**To:** PlanningPolicy

**Miss Claire Sawyer**

**Planning and Development**  
Ipswich Borough Council  
Grafton House  
15 – 17 Russell Road  
Ipswich  
Suffolk  
IP12DE

31<sup>st</sup> January 2020

To whom it may Concern

**The Building of 23 – 30 Dwellings In Lavenham Road Ipswich**

**Reference planning No: IP061 (UCO64) of the Former School Site on Lavenham Road, Ipswich**

I wish to put into writing my strong objection to the proposed use of/proposed erection of 23-30 Dwellings on Lavenham Road, Ipswich by Ipswich Borough Council.

I have along with other Neighbours examined the plans of the site and knowing the proposed site as well as I do, I feel that it is an unfair move from Ipswich Borough Council to now erect the mentioned above dwellings on the green in Lavenham Road.

The green is used by young children to play on, families to picnic on in the summer months and people who daily walk their dogs and as whole it is enjoyed by all.

This is killing off the final part of an already spoilt open land space to which I was not made aware of at the time of buying my property in 2016.

Unfortunately you gave permission/sold off a large chunk of the green already which has been totally destroyed by Suffolk County Council to build a Respite Home of which type none of us have really been advised of we just keep hearing whisperings that it is going to be a rehabilitation centre for unknown what types of people (the current rumour is that it is going to be for probationers recently released from prison) also residents were not consulted as to if we objected too, nor were we invited to lodge any type of objection, there was no planning meeting or nothing just a letter which was shoved through our doors sighting an incorrect address and placing of the site which we now know is directly on our doorstep!!

I strongly object to having further disruption as we have had since the summer of July 2019 onwards from rude builders who feel it is ok to dump their vehicles on private land leave the place looking an eyesore with their daily

constant use of the dead end road for parking the obtuse amount of white vans and vehicles daily blocking exit and entrance to our own homes and car park and not caring that they do so, the building towers above our properties and eventually will give the residents a clear and open view inside our bedrooms and homes as its been built far too close to our properties with only a footpath between us and them, and I now feel that by planning to put the 23 – 30 dwellings up would be a very unfair move on your part as this will put a terrible strain on an already over used road system being Lavenham Road in total and Kelly Road. This will give us no outlook at all, all we will see is the backs of other houses which is not what we wanted as if we did I/we would of bought a lower valued property in the middle of a cul-de-sac. It will drastically lower the value of our already dwindling properties values, you have offered no service road to help us with parking etc and giving us a better reach to our properties you feel it is ok to just bury our properties behind another load of new buildings which is terribly unfair, you have offered us any olive branch for all of the awful disruption that we are continually being put through at the hands of both our local councils and to this end I want to reiterate again my Very Strong Objection to any further building in the Lavenham Road Areas as quite frankly we are all completely sick of your lack of care to us as residents and house owners.

Yours Angrily  
Claire Sawyer

Sent from Mail for Windows 10

**Felicia Blake**

---

**From:** Hilary Scott  
**Sent:** 10 February 2020 16:17  
**To:** PlanningPolicy  
**Subject:** Form raising my objections to the proposed development of 126 houses close to Ainesbourn Crescent, I  
**Attachments:** 5\_updated\_21.01.20\_local\_plan\_final\_draft\_comments\_form\_Hilary Scott  
Ravenswood.doc

Please note my concerns on the attached Word document.

I have twice requested a planning or other reference but this has not been supplied despite your planning team emailing me today ... twice!

Hence the long use of the title of my email and the subject line in the document!

Kind regards  
Hilary Scott

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which  
this comments form relates:

None I can find on the Ipswich Borough Council website

Please return this comments form to:	<u>planningpolicy@ipswich.gov.uk</u> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
Title	Mrs	
First name	Hilary	
Last name	Scott	
Job title ( <i>where relevant</i> )		
Organisation ( <i>where relevant</i> )		
Address (Please include post code)		
E-mail		
Telephone No.		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

**Your name or organisation (*and client if you are an agent*):**

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
---------------------------------------	---

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<p><i>An extra 126 homes could be built in Ravenswood after land set aside for a new business park in Ipswich's local plan was changed to allow for more houses.</i></p>	<p>I recently moved to Ravenswood, last June 2019. In this time, I have become aware of the major issues we face on a daily basis, for those of us living here on the development in respect of traffic and cars.</p> <p>One of the most infuriating issues is the number of cars parking on the main road outside the Ravenswood Community Primary School blocking the road completely and if they cannot park on the road, they then drive up onto the verges, ruining the grass verges if they park on them.</p> <p>The roundabouts next to McDonalds are a nightmare and on one occasion it took me an hour to drive out of Ravenswood Avenue and out onto the A14 purely because of traffic congestion.</p> <p>When cars use McDonalds drive through, they queue and block the access to Hening Avenue, this then backs up the traffic on all the access roads around Ravenswood Avenue – which is terrible if you have an ill person or pet who needs to get to the facilities quickly!</p> <p>By adding a further 126 homes, this can only get worse, even if you create another access road off the A1189, the main roundabout will become slower and more congested – and add in the frequent closures of the Orwell Bridge, we get grid locked around here.</p> <p>I would suggest the Planning Committee travel around these roads around commuting times and school drop and collection times, so you can witness the issues we face daily.</p> <p>Rather than build on green land where the wildlife will be negatively impacted and at a time when Climate Change is a major issue, why can't you allow land and buildings in central Ipswich to be used to create more homes, as was shown in a recent Panorama programme on 13<sup>th</sup> January 2020 "How to save the UK's crisis-hit High Streets" where it was shown these town centres need to adopt a different approach and help create a residential hubs and retail communities. By building outside of the main town, you are encouraging traffic pollution, congestion, ill health such as increases in asthma and other breathing issues. PLEASE WATCH THE PROGRAMME IF YOU HAVEN'T, it will be on iplayer! AND I identified this change of use for town centres years ago and raised my ideas with Colchester Planning Committee when I was refused planning permission for an extension to my home!</p> <p>If the land was for businesses, then why cannot it be used to enhance the area, in terms of adding a park or lake, to encourage more wildlife into the area. We need more green spaces and trees and areas of natural beauty, not more homes on an already overpopulated development with too many cars.</p>

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

### RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

**The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for Independent examination.**

**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

### PRIVACY NOTICE

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As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

**Felicia Blake**

---

**From:** Bashar Shatta  
**Sent:** 10 February 2020 22:08  
**To:** PlanningPolicy  
**Subject:** Concern re Ravenswood Allocation

**Importance:** High

Dear Sir / Madam,

I am writing to raise our concern as a family with regards to the proposed 126 houses off Alensbourn Crescent in Ravenswood, Ipswich.

**Access is a major problem for all Ravenswood residents as well as parking.**

New roads in and out of Ravenswood are needed and more parking spaces should be provided before any other houses are built.

We strongly object to the proposal until at least access issues have been addressed.

Kind regards

Dr Bashar Shatta

S6

**Felicia Blake**

---

**From:** Philip Raiswell .  
**Sent:** 28 February 2020 12:23  
**To:** PlanningPolicy  
**Subject:** Sport England Representations  
**Attachments:** 20200228 Ipswich Local Plan Reps.doc

Please find enclosed Sport England's representations.

Kind Regards,

**Philip Raiswell**  
Planning Manager

M:\  
E:\



The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/>. If you have any queries about Sport England's handling of personal data you can contact Louise Hartley, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

e-mail:  
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BOROUGH COUNCIL**

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

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<b>Consultation document(s) to which this comments form relates:</b>	
<b>Please return this comments form to:</b>	<p><u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or</p> <p><b>Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE</b></p>
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<b>This form has two parts:</b>	<p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>

#### PART A PERSONAL DETAILS

	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	Mr	
<b>First name</b>	Philip	
<b>Last name</b>	Raiswell	
<b>Job title (where relevant)</b>	Planning Manager	
<b>Organisation (where relevant)</b>	Sport England	
<b>Address (Please include post code)</b>		
<b>E-mail</b>		
<b>Telephone No.</b>		

## PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation (*and client if you are an agent*):

Please specify which document(s) and document part you are commenting upon.

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Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Policy CS10	<p>Sport England are broadly supportive of this policy, but have concerns regarding the reference to 'dual use playing fields'. It is considered that the policy requirement for outdoor sport should not include school playing fields, as these are not always made available for public use, and over use can affect their quality.</p> <p>The requirement for replacement playing fields for Ipswich School must be in addition to the policy requirements for community outdoor sport provision.</p>
Policy DMS	We support the revisions to this policy, with regard to sites of low quality, which will ensure that sites are not deliberately neglected in order to assist their redevelopment.
Policy DM12	We support this policy, as it adds supporting text promoting the use of Sport England's 'Active Design' guidance.
IP032	<p>Sport England raises no objection to this allocation, but we feel the text in relation to the requirements for a replacement facility should be more explicit and should reflect Sport England's policy in relation to replacement playing fields, which states:</p> <p>The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:</p> <ul style="list-style-type: none"> <li>• of equivalent or better quality, and</li> <li>• of equivalent or greater quantity, and</li> <li>• in a suitable location, and</li> </ul>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
	<ul style="list-style-type: none"> <li>● <b>subject to equivalent or better accessibility and management arrangements.</b></li> </ul> <p><b>Including the above text within the policy or supporting text would make Sport England support at application stage more likely.</b></p>

## PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft

Document(s) and document part	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)

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## Comments on Draft Final Submission Ipswich Local Plan

### Bourne Garden Centre Wherstead Road

On behalf of: Stephen Salter

Prepared by: Steve Miller Dip TP MRTPI

Date: 10/02/2019



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August 2018



Room 3.11, Fellow Millings, Fellow Street, Ipswich, IP2 8SJ  
Tel: 01473 407911  
E: [enquiries@planningdirect.co.uk](mailto:enquiries@planningdirect.co.uk)  
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## Introduction

This submission relates to an earlier submission which proposed that Bourne Garden Centre Wherstead Road be allocation for housing development. Officers rejected the submission, ref: 26098

This Statement further makes the case for this residential allocation in the context of the housing constraints in the Borough and the application of the exception test in planning and flooding.

This Statement is submitted on behalf of Stephen Salter, part owner of Bourne Garden Centre. It will look to dispel the Council's concerns and demonstrate that the residential development of the site is necessary to boost deficient housing supply within the town and can be designed to minimise flood risks

It is intended that this document will provide compelling evidence that the development constitutes sustainable development, provides a timely contribution to the housing land supply, raises the design standard of the area and integrates successfully within its particular residential context in accordance with the relevant local, regional and national planning policies.

# Description of Development Site & Proposals

The site is a low-grade open brown-field commercial site in need of major redevelopment. It provides a very poor impression at this southern gateway into the town. There is no commercial interest in investing in major redevelopment. However, the site is ideal for the creation of a landmark housing development which would vastly improve the image of the town and this run-down area. The site owners wish to work with the Council to achieve this and would welcome some pro-active engagement as recommended in the National Planning Policy Framework.

The site owners have invested considerably in the technical assessment of development potential and the current design was conceived by an established local architect, Fielden and Mawson. This is for approximately 100 apartments and , amongst other things, incorporates flood refuges all as detailed in the documents attached to the previous submission, viz-

- Flood Risk Assessment by Paul Snape Consulting dated July 2018 with appendices-
  - A ( Scott Wilson draft Flood Risk Assessment 2007),
  - B- Fielden and Mawson Pre-application report 2017,
  - C- Anglian Water sewer records,
  - D- Hydraulic Modelling Report 2012,
  - E- EA Product Information
  - F- EA Correspondence
- Mr Salter's response form dated 01 October 2018 being an update response for the Strategic Housing and Employment Land Availability Assessment.
- Transportation Noise Assessment Report by Sound Solutions dated 27 September 2018
- Appeal decision ref: APP/J1860/A/14/2214624 dated 6 June 2014, Malvern Hills District Council
-

- Planning Statement

These documents are a matter of record and are not therefore resubmitted with this Submission.

## Planning History

Reference no.	Description	Decision	Date
None	None		

# Policy Justification

## National

### **National Planning Policy Framework**

Para 8- the 3 components of sustainable development - economic, social and environmental

Para 10- the presumption in favour of sustainable development

Para 11- the tilted balance in favour of development where there is no 5 year supply of housing land

Para 155- where inappropriate development is necessary in high risk areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

Para 158- the aim of the sequential test is to steer new development to areas with the lowest risk of flooding.

Para 159- If it is not possible for development to be located in areas of lower flood risk ( taking into account wider sustainable development objectives) the exception test may have to be applied depending on the vulnerability of the site and proposal in line with the Flood Risk Vulnerability Classification

Para 160 - For the exception test to be passed it should be demonstrated that the proposal would provide wider sustainability benefits to the community that outweigh the flood risk, and that the development would be safe for its lifetime without increasing flood risk elsewhere.

## **National Planning Policy Guidance**

Para 033 - when applying the sequential test, a pragmatic approach on the availability of alternatives should be taken

Para 035- this sets out when the exception test can applied, which in this case it can on the basis of Table 3, the site being located within flood zone 3a.

Para 036- sites suited to regeneration will likely pass the first part of the exception test

Para 038- this lists the component parts of a Flood Risk Assessment relating to the safety of developments.

Para 039- ensuring safe access and egress

## Local

### **Core Strategy and Policies 2017**

Policy CS1- this includes the “tilted balance” towards approval as set out within para 11 of the NPPF

Policy DM4- Development must satisfy the following criteria-

- it must not increase the risk of flooding elsewhere
- it will be adequately protected from flooding in accordance with adopted standards
- it will remain safe for its lifetime
- it must include water efficiency measures

Para 9.36 states that “more vulnerable” development as defined may be acceptable in flood zone 3a subject to then being safe.

### **Final Draft- Core Strategy and Policies 2020**

Policy CS1- this commits to working proactively with applicants to find solutions

Policy CS7- the amount of new housing required

Policy DM4- this basically repeats extant policy DM4

Para 9.4.12 basically repeats extant para 9.36

# Planning Considerations

## Flood Risk Assessment

This was submitted previously and demonstrates that the development is safe for its lifetime. A refuge can easily be provided in the flood zone 1 rear part of the site. Compensatory storage of tidal water can be achieved and suitable conditions of planning permission imposed.

There would be adequate warning of any tidal flood through the Environment Agency and media/apps etc. An Evacuation Plan could be easily be formulated to ensure prior evacuation to the flood zone zone 1 part of the site and /or to Bourne Park, (Flood Zone 1 ) a short walk away. Emergency vehicles can access the Park from roads away from Wherstead Road. These details would be incorporated in an Evacuation Plan conditioned in any planning permission.

The development would provide for much-needed new housing in the Borough and improve an unattractive “gateway” into the town. The proposals would therefore help regenerate this area and are thus supported in this respect by the exception test.

The FRA shows that inundation of part of the site would occur in the 1:200 year flood + climate change event. This has been carefully considered in the FRA. It is considered that as only part of the site is in flood zone with the remainder in flood zone 1, the wide forewarning of a flood event through the media and other outlets, a carefully detailed flood evacuation and management plan, and the very close proximity of the site to Bourne Park with its easy emergency vehicle access, are all points in support of the development. All of these matters have to be weighed in the balance when considering whether this part of the exception test is passed.

There is clearly a case for supporting this proposal in consideration of the exception test. The Environment Agency has not objected to the proposals during extensive discussions over recent years and all of their requirements can be incorporated within the development. There have been no objections from the emergency services during this period either.

Following the submission of our earlier statement, the Council received two consultations on which they based their confirmation not to allocate the Nursery for housing. It is not understood why the Environment Agency were not consulted given that they would be a statutory consultee on any planning application made. AECOM commented on the submission and have not objected to the development. They are fully supportive of the proposals but did not conclude on access routes deferring this to the emergency services for consideration.

The Fire Service response is generic only and presumably hasn't taken into account the Flood Risk Assessment. However, it does not object to development where access roads may be inundated. It accepts that evacuation may be necessary and recommends enhanced safety provision such as sprinklers.

Officers consulted the Suffolk Joint Emergency Planning Unit who did not wish to comment but recommended consultation with the Fire Service.

The Officers' conclusions in rejecting the proposals do not appear to follow the clear flexibility shown in the consultee responses. They have adopted a rigid position on access routes which cannot be so concluded from the responses. There is no objection from the Environment Agency.

Having regard to the consultee responses and the detailed considerations on safety in the FRA it is considered that the proposals should be considered acceptable as regards flooding matters.

## Housing Land Supply

As stated in NPPF para 11, strategic policies should provide for objectively assessed housing needs. The draft Local Plan has attempted to provide for this but many of the assumptions are questionable, as discussed below.

Table 1 allocates residential sites totalling 2,750 dwellings. These are mostly small brownfield sites with existing uses which would have to be relocated first. Many have been allocated for many years with no indication that they will be developed within the Plan period.

Table 2 allocates residential sites for 1,470 dwellings to meet the identified need but these already have planning permission and should not therefore be included in a Local Plan. This approach depresses needs calculations and is a form of double counting.

The Plan relies on nearly half of its need from a single large site, Ipswich Garden Suburb. However, outline planning permissions have only just been granted and extensive infrastructure is needed to facilitate the development. If the IGS stalls then the Council will fail to meet anything approaching its housing needs. The delivery of this multi-ownership site has been delayed for many years. It was first allocated in the draft Local Plan in 2001 and finally allocated in the 2012 Local Plan. The current outline planning application ref: 14/00638 has only just been granted after about 6 years. The permission allows the development to commence within 7 years. This record does not bode well.

The Humber Doucy Lane Lane site (ISPA4.1- 500 dwellings) is part of a cross-boundary site and is actually four separate disjointed sites probably in multi-ownership. It is proposed that it be masterplanned with the adjacent East Suffolk draft allocation and timed to be after the Ipswich Garden Suburb. Given the Borough's poor delivery record on the northern fringe, it is queried whether this site can be developed in any meaningful way during the Plan period.

The deficiencies in Local Planning in the Borough are laid bare with housing delivery performance. In the published Housing Delivery Test 2018 which revealed that only 66% of the required homes had been delivered in the three years before thus triggering the need for an action plan. Consequently, a draft action plan was published belatedly in August 2019, but now after 2 years there is no adopted action plan. The draft Plan contains few ideas to boost housing delivery as required by the Government. It only suggests cosmetic administrative devices which will not change much.

The actual housing land supply set out in the Annual Monitoring Report for 2017/18 , Table 15, shows that there is 2.78 years supply. This is the stark reality of all the problems mentioned above. There is no indication that the situation will change any time soon. The Ipswich Strategic Planning Partnership of the Planning Authorities in Eastern Suffolk has been set up but this has not yet delivered a policy approach to the tightly drawn boundary of the Borough. Prior Regional Plans and Structure Plans recognised this is a problem and accordingly allocated part of Ipswich Housing needs in surrounding districts in what was called the Ipswich Policy Area. The demise of this sort of spatial planning has led to the current position where the districts are catering only for their own housing needs. Understandably, there is no political appetite for surrounding rural districts to take some of Ipswich's needs and this will mean that Ipswich will likely continue to fail to deliver sufficient housing.

In this context, there is a strong presumption in favour of developing sites like Bourne Nursery if all other planning issues can be satisfactorily resolved.

## Conclusion

Mr Salter has invested considerable time and expense in investigating the development of Bourne Nurseries. Detailed flooding assessments have been undertaken and extensive consultation taken place with the Environment Agency and emergency services. At all stages the feedback has been positive and the additional technical work carried to the Environment Agency requirements. Not at any stage have fundamental objections been raised.

The latest consultations following our earlier submission has, again, not raised any fundamental objections in principle. All the concerns of the consultees can be met. The site is partly within flood zone 1, the development can be made safe for its lifetime, refuges can be made available on site, flood evacuation routes can easily be facilitated to Bourne Park and compensatory storage can be designed in. Whilst approach routes could be inundated this has not been raised as a fundamental objection by AECOM or the Fire Service and this should be decisive in the expert consideration of the exception test. The Council should defer to the technical experts.

Given that the development and its occupants would, for all practical purposes, be safe then considerable weight should be given to the tilted balance in favour of development here, as set out in the NPPF. Considerable weight should be given to the need for more housing in accordance with the Government's objective to boost housing delivery.

## **Felicia Blake**

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**From:** Mures, Lucy  
**Sent:** 05 February 2020 08:43  
**To:** Felicia Blake  
**Cc:** PlanningPolicy  
**Subject:** RE: EXTENSION OF TIME: Notice of Public Consultation Ipswich Local Plan Review Final Draft

**Good morning**

Thank you for notification of consultation on the Ipswich Local Plan Review- Final Draft. Suffolk Constabulary does not have any further comments to make relating to the soundness or legal compliance of this document.

May I take this opportunity to acknowledge the positive enhancements to the local plan in terms of the adherence with security measures. Partnership working in this way will ensure that all opportunities to design out crime are taken at the earliest stage in the process, helping to keep our communities safer and providing homeowners and businesses with a clear framework within which to operate.

**With regards**

---

**Lucy Mures**  
Design Out Crime Officer (Ipswich)  
Neighbourhood Partnership Team South  
Police Station  
10 Museum Street  
Ipswich  
IP1 1HT

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**From:** Felicia Blake <[Felicia.Blake@ipswich.gov.uk](mailto:Felicia.Blake@ipswich.gov.uk)>  
**Sent:** 24 January 2020 09:04  
**Subject:** EXTENSION OF TIME: Notice of Public Consultation Ipswich Local Plan Review Final Draft

Dear Sir/Madam,

Please see attached.

Kind regards,

If you wish to be taken off our email list please reply to me or email [PlanningPolicy@ipswich.gov.uk](mailto:PlanningPolicy@ipswich.gov.uk)

**Felicia Blake**

**Business Support Officer  
Planning and Development  
Ipswich Borough Council, Grafton House, 15-17 Russell Road, Ipswich IP1 2DE**

Tel: 01473 43 2019  
Email: [felicia.blake@ipswich.gov.uk](mailto:felicia.blake@ipswich.gov.uk)  
Web: [www.ipswich.gov.uk](http://www.ipswich.gov.uk)  
Facebook: <https://www.facebook.com/IpswichGov>  
Twitter: [twitter.com/IpswichGov](https://twitter.com/IpswichGov)

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**Useful Links:**

**Current Consultations**

<https://www.ipswich.gov.uk/currentconsultations>

**Closed Consultations**

Draft Suffolk Coast European Sites Recreational Disturbance Avoidance and Mitigation Strategy Supplementary Planning Document (SPD) <https://www.ipswich.gov.uk/suffolk-coast-rams-spd>

Ipswich Local Plan Review Preferred Options <https://www.ipswich.gov.uk/ipswichfuture>

Conservation Areas Designation <https://www.ipswich.gov.uk/content/about-our-conservation-areas>

**Forthcoming Decisions List**

<https://democracy.ipswich.gov.uk/mgListPlans.aspx?RPlId=135&RD=0&bcr=1>

**Recently Adopted**

<https://www.ipswich.gov.uk/content/urban-character-supplementary-planning-document>

<https://www.ipswich.gov.uk/content/public-consultation-ipswich-town-centre-waterfront-public-realm-strategy-spd>

<https://www.ipswich.gov.uk/content/urban-character-supplementary-planning-document>

<https://www.ipswich.gov.uk/content/development-and-archaeology-supplementary-planning-document-spd>

**Adopted Ipswich Local Plan 2011-2031**

<https://www.ipswich.gov.uk/content/adopted-ipswich-local-plan-2011-2031>

**Additional Planning Policy Links:**

<https://www.ipswich.gov.uk/localplan>

<https://www.ipswich.gov.uk/content/local-development-scheme>

<https://www.ipswich.gov.uk/services/ipswich-garden-suburb-northern-fringe>

<https://www.ipswich.gov.uk/services/community-infrastructure-levy> - Update only

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Date: 2 March 2020  
Enquiries to: Cameron Clow  
Tel:  
Email:



Ipswich Borough Council,  
Grafton House,  
Russell Road,  
Ipswich,  
IP1 2DE

Dear Mr Fulcher,

### Ipswich Draft Local Plan: Regulation 19 Consultation

Thank you for consulting Suffolk County Council on a new Local Plan for the county town of Ipswich.

Suffolk County Council (SCC) strongly supports the Borough Council's efforts to put a plan in place to guide sustainable growth. Throughout the process of producing this Plan, the Borough and County Councils have made extensive efforts to cooperate on local and strategic matters, not least through the Ipswich Strategic Planning Area Board, and the County Council is grateful for the efforts made by the Borough.

Generally, the County Council supports the draft Local Plan, however there are parts of the plan which require amending to be sound.

This letter will set out where the plan is not sound, explain which of the tests soundness parts of the plan does not comply with (as set out in paragraph 35 of the NPPF). The County Council considers that the plan can be made sound and will provide support to the Borough Council to do so where necessary.

Where amendments to the plan are recommended, deleted text will be in ~~strikethrough~~ and added text will be in *italics*.

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#### Table 8a Major Infrastructure Proposals

This part of the plan is not sound because it is not in line with national policy. NPPF paragraph 34 explains that plans should set out the contributions expected from development and this part of the plan needs updating to meet this requirement. The County Council will work with the Borough in reviewing the wording and costs in the table and will agree matters through a Statement of Common Ground.

#### *Early Years Education*

This part of the plan is not sound as it is not effective. In setting out the strategy to address early years demand caused by growth in the Gipping Ward, the table states that a new setting (such as a day nursery) on a development site is required, however the specific site has not been stated. In order to provide certainty that development in the Gipping Ward can mitigate its impact, the site should be specified in the plan. Options considered throughout the plan making process have been

sites IP003, IP051 and IP279. IP003 and IP051 are both within flood zone 3, while IP279 is largely outside flood zones 2 and 3. Taking a sequential approach to more vulnerable uses, IP279 would be the County Council's preferred choice for a setting. The site sheet and entry in Table 1 of the Site Allocation Policies document should also be updated in line with this amendment.

#### ***Primary Education.***

In addition to the expansion of Rose Hill Primary, St Mark's and Sprites Primary schools, there will be a requirement to expand Cliff Lane Primary School. However, depending on the precise number of pupils, either St Mark's or Sprites Primary schools or both would need to expand. To make this part of the plan sound, Cliff Lane Primary should be added to Table 8a.

#### ***Secondary Education***

The County Council has reassessed the secondary school needs arising from the local plan with updated pupil forecasts (January 2020), which has resulted in a change of strategy. Table 8a currently states that both Stoke High School and Chantry Academy need to be expanded. In previously assessing the need for secondary school places, SCC used the school pyramids to identify where pupils from development would attend school. However, Ipswich is unusual in Suffolk in that the school pyramid areas and the secondary school catchment areas are different from one another. On reflection, the County Council considers it is more appropriate to base the secondary school strategy on the school catchments. Depending on the rate of delivery within Ipswich Garden Suburb, this results in only Stoke High School needing to expand..

#### **Primary Education**

##### ***Site Sheet for Site IP010a***

This part of the plan is not sound because it is not effective. The County Council welcome that the need to expand the school has been recognised within the plan, however feasibility work which has been undertaken since the preferred options consultation of the plan show that the area of land needed to expand the school is 0.8ha.

#### **Early Years Education**

##### ***Site Sheet for Site IP048a***

This part of the plan is not sound because it is not effective. Included among the uses of this site should be an early years setting to accompany the new primary school. The 60 place early years setting, which is necessary on this site to mitigate impacts of plan growth, is accounted for in Table 8a of the Core Strategy document. However, this should also be included on the site sheet in order to provide certainty in delivering an early years setting on this site.

##### ***Table 1 of the Site Allocations Policies document***

This part of the plan is not sound because it is not effective. The entry for site IP048a and IP037 on this table should include an early years setting, to provide certainty in delivering an early years setting on this site, in order to mitigate the impacts of growth on the provision of early education.

#### **Transport**

As justification for this policy the Suffolk County Council Transport Mitigation Strategy for the Ipswich Strategic Planning Area should be included in the plan evidence base, alongside the results of the Suffolk Transport Model.

##### ***Policy CS20 and Transport Mitigation Strategy for the ISPA***

Reference to the Transport Mitigation Strategy for the ISPA is welcome and very much supported, as is the focus on sustainable transport measures. As a strategic priority, the Plan needs to address the cumulative transport impact created by planned growth in the Ipswich Strategic

**Planning Area (ISPA).** As a cross boundary issue, it is appropriate that this is reflected in strategic policy, as stated in paragraph 21 of the NPPF. Suffolk County Transport Model highlights that growth in Ipswich and the surrounding districts may cause severe impacts on the highway network within and around Ipswich, which cannot be addressed through improvements to the highway alone. The Plan must include an appropriate strategy to avoid severe and significant transport impacts in the ISPA. Within the wider Ipswich area, the strategic routes of the A14 and A12 would also receive greater volumes of traffic, which could have severe consequences for traffic flows along these routes and the safety of road users. Several substantial modifications to junctions would be required, which would require significant investment funded by new developments.

Understanding that viability for new development could be comprised, and reflecting on the need to shift travel patterns, the County Council sought to work out what degree of modal shift would be required and what steps could be taken to produce such shifts. The resultant Mitigation Strategy was produced to provide evidence during the Suffolk Coastal Local Plan examination and not just for this part of Suffolk, but also for the Borough of Ipswich, Babergh and Mid Suffolk districts.

The County Council considers the appropriate strategy to be maximising sustainable transport in order to achieve a significant proportion of modal shift in both the new and existing population. The Mitigation Strategy was submitted as evidence to the Suffolk Coastal Local Plan Examination and referenced in the County Council response to the Babergh and Mid Suffolk Preferred Options Joint Local Plan and includes:

- A Transport Mitigation Strategy for the Ipswich Strategic Planning Area – representing Suffolk County Council's approach to delivering modal shift measures to reduce impacts on the highway network and key junction improvements;
- A transport modelling report, which assesses the impact of applying the modal shift identified in the Transport Mitigation Strategy and evidence submitted alongside the Plan;
- A methodology report which supports the modelling report; and
- A statement on highway impacts on the Strategic Road Network, produced by consultants WSP

The evidence base for the Local Plan includes the most recent Suffolk Transport Model results and methodology report, which is welcome. In order to have a consistent approach to addressing the described impacts in the ISPA and on Ipswich, a shared evidence base across planning authority boundaries is required to justify this approach. The Suffolk County Council Transport Mitigation Strategy is currently not part of the evidence base of the submission draft Local Plan and needs to be included in order to ensure this approach is sound. Achieving significant modal shift is a Local Plan Objective (5) and the Transport Mitigation Strategy is reflected in policies CS5 and CS20.

#### *Policy DM21*

This part of the plan is not sound because it is not in line with national policy, specifically in relation to the lack of explanation as to when travel plans are required. Paragraph 111 of the NPPF states that where a development is likely to generate significant amounts of movement should be supported by a Travel Plan. The County Council has produced further detailed guidance<sup>1</sup> as to when a Travel Plan or Travel Plan measures should be implemented for a site. These indicative thresholds are set out in the table below.

The importance of travel plans in achieving modal shift to sustainable modes of transport is stated in the Suffolk County Council Transport Mitigation Strategy for the ISPA which states in paragraph 5.2.16:

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<sup>1</sup> <https://www.suffolk.gov.uk/assets/Roads-and-transport/public-transport-and-transport-planning/Local-Links/26444-Suffolk-Travel-Plan-Guidance-V5-Web-Version-LR.pdf>

**"The effectiveness of Travel Plans secured through the planning process would only provide a contribution towards positive modal shift if fully supported. There needs to be a firm endorsement of the role that Travel Plans have in the effective mitigation of development supported through local plan policy"**

A similar approach should be taken with Travel Plans as is taken with Transport Statements and Assessments. The Plan's explanatory text should make reference to the indicative threshold set out in County Council guidance, with the caveat that in some sensitive areas, such as those within or affecting Air Quality Management Areas, full travel plans may be required where normally Travel Plan Measures would be acceptable. The table below shows the thresholds included in the County Council guidance.

Land use	Travel Plan measures required	Travel Plan required
<b>A1 Food retail</b>	→250←800 sq. m	→800 sq. m
<b>A1 Non-food retail</b>	→800←1500 sq. m	→1500 sq. m
<b>A2 Financial and professional services</b>	→1000←2500 sq. m	→2500 sq. m
<b>A3 Restaurants and cafés</b>	→300←2500 sq. m	→2500 sq. m
<b>A4 Drinking establishments</b>	→300←600 sq. m	→600 sq. m
<b>A5 Hot-food takeaway</b>	→250←500 sq. m	→500 sq. m
<b>B1 Business</b>	→1500←2500 sq. m	→2500 sq. m
<b>B2 General Industrial</b>	→2500←4000 sq. m	→4000 sq. m
<b>B3 Storage or distribution</b>	→3000←5000 sq. m	→5000 sq. m
<b>C1 Hotels</b>	→75←100 bedrooms	→100 bedrooms
<b>C2 Residential institutions – hospitals, nursing homes</b>	→30←50 beds	→50 beds
<b>C2 Residential institutions – residential education</b>	→50←150 students	→150 students
<b>C2 Residential institutions – institutional hostels</b>	→250←400 residents	→400 residents
<b>C3 Dwelling houses</b>	→50 ←79 dwellings	→80 dwellings
<b>D1 Non-residential Institutions</b>	→500←1000 sq. m	→1000 sq. m
<b>D2 Assembly and leisure</b>	→500←1500 sq. m	→1500 sq. m
<b>Others</b>	Discuss with SCC Highways	Discuss with SCC Highways

In order to ensure that all development deliver a sufficient Travel Plan or Travel Plan measures an amendment to the policy is recommended below.

**"The Council will expect major development proposals to provide a travel plan or travel plan measures where appropriate, to explain how sustainable patterns of travel to and from the site will be achieved."**

An amendment to paragraph 9.21.8 is recommended below to further explain the travel plan guidance and what is determined to be "appropriate".

**"The County Council's Suffolk Travel Plan Guidance, which contains indicative thresholds will be used to determine the need for a Travel Plan or Travel Plan Measures. Some**

*smaller sites which do not meet the requirements for a full Travel Plan, but are in sensitive locations may require a full Travel Plan to help mitigate traffic impacts."*

#### **ISPA4**

The County Council welcomes the policy commitment to coordinate development across boundaries. It is noted that this area is outside of any of the buffers district or local centres defined on Plan 1. NPPF paragraph 92 states that planning policies and decision should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services." Paragraph 103 states that the planning system should limit the need to travel, through an appropriate mix of uses.

In order to enable access to services and make future communities in the area defined by ISPA4 sustainable the policy should state the masterplanning of the site should also consider the inclusion of a local centre.

This will also help to keep the plan more internally consistent as paragraph 6.17 states that where possible development should be located so that residents can access existing local or district centres. As this is a large development, outside of local or district centre buffers, the potential scope for a new local centre appears to be an aspect that should be investigated through masterplanning.

#### **Town Centre Parking**

In considering the future of Ipswich, the combined challenges of reducing carbon dioxide emissions to mitigate the impact of climate change and improving the air quality of major towns like Ipswich does mean that there needs to be a reduction in the number of private cars using the highway network in Ipswich throughout the plan period, regardless of technological improvements.

Furthermore, there is simply not the physical space within the town to allow for a free-flow of traffic with the level of travel demand that is likely to be generated. Producing the shift in travel patterns is required over the long-term but short-term actions are also necessary. These are currently but are not limited to:

- Promotion of travel planning to existing residents and employees, as well as those from new development. (The programme is known as Smarter Choices and the positive way individuals can make such changes in personal travel a fundamental feature);
- The quality bus partnership, which is already being established, to improve the coordination between bus companies and target investment into bus services;
- Physical infrastructure improvements that are necessary to improve public transport provision and encourage more people to walk and cycle, and
- Achievement of a parking strategy that supports modal shift.

During 2019, WYG Transport Planning finalised its report into forming a parking strategy, which Ipswich Borough Council commissioned to support its forthcoming strategy. This study focused on public car parks in the town centre and did not include private staff car parks. The report has only recently been published by the Borough Council, although Suffolk County Council was involved in different stages during its production.

#### ***WYG Report***

There is a tension between managing parking demand and achieving a shift in travel from single-occupancy trips by car. This tension, and the need for a balance, is expressed well by WYG (para. 7.2.8) that:

*"It is important that the parking strategy fits as one element of a coherent overarching transport and access strategy for the town. Care should be taken to ensure that the proposed level of parking is not set too high as to inadvertently encourage car use to access the town to the detriment of more sustainable modes, particularly if doing so would be likely to undermine the viability of such services and supporting infrastructure (e.g. congestion increasing delay for public transport vehicles or severance of key links for pedestrians and cyclists by major traffic corridors). This said, the future prosperity and economic success of the town centre will be reliant upon reasonable access by car."*

There is also considerable acknowledgment of the potential role for Park and Ride services in reducing demand for town centre parking but that this potential could be inhibited unless "major changes are also made to the number of spaces and cost of town centre parking" (para. 6.3.9). Furthermore, Park and Ride services could assist freeing up long stay spaces to short stay (para. 9.5.6) and that "the parking strategy needs to be consistent with the Local Transport Plan if steps to tackle congestion and air quality problems are to be successful" (para. 9.6.3).

WYG's report makes recommendations and does not set out a strategy, this will be formed and adopted by the Borough Council separately (Policy CS20.e.). WYG's report includes several policy options and matters that require further consideration. For example, regarding parking and land use development, WYG recommend (page 105) the Borough Council:

*"Consider the impacts of redistributing car parks across the town centre to better meet demand in the future. It may be necessary to create more spaces in the Riverside, Station & Office and Town Centre North zones and reduce the future number of spaces in the remaining zones."*

The WYG analysis accounts for the replacement of all temporary car park spaces and, whilst the replacement parking spaces in Town Centre Central, East & West is "of the right order", additional spaces over and above the planned additional spaces were identified within the Riverside & Cardinal Park area, around the Station & Office area to the West of the Town Centre, and within the area to north of the Town Centre (para. 9.3.7). However, the provision of additional spaces is one of the options contained the WYG report.

In commissioning this report, the Borough Council did take account of the need to achieve modal shift, which translated into an overall reduction in future parking demand by 10% on additional growth. This reduction reduces the growth in parking demand assumed to arise based on TEMPro growth factors. The analysis was undertaken in 2017 and, at the time, the use of the growth factors and the 10% modal shift assumption was reasonable, but both assumptions predate the Transport Modelling by WSP or the Transport Mitigation Strategy. For example, the WSP Modelling assumes a 15-20% reduction in employment trips to the Town Centre by new development (ISPA Local Plan Modelling, Table 5-2).

The Local Plan modelling includes trips already on the road network and accessing existing car parking spaces. However, as the Borough Council prepares its parking strategy, the implications for transport modelling need to be considered because there might be different impacts from that already modelled such as through the relocation of existing spaces.

For Ipswich (the whole administrative area), TEMPro predicts a 19% growth in car-based trips between 2016-2036, whereas the modelling for the Local Plans Indicates a 31% increase in the AM peak destination trips.

The WYG analysis recommends using new technology to analyse occupancy data to better understand the location and quantity of long and short stay parking and the turnover of spaces (page 114). This, combined with other technological improvements such as variable message

signs, should allow for increased occupancy beyond the 85% occupancy level assumed in the report.

What is notable is that the parking survey undertaken before the reopening of the Crown Street Car Park and the occupancy of some car parks was modelled from other surveys.

In summary, the rate of traffic growth assumed by the parking strategy is lower than that which is being forecast by the Local Plan modelling, even accounting for modal shift. However, meeting this demand would only not address the level of congestion and the combined challenges carbon reduction and improving the air quality.

#### *Parking Strategy outlined in the Local Plan*

Part of the equation in developing and implementing the parking strategy will be the need to constrain the attractiveness of long stay parking for commuters who are working in Ipswich. The current Reg 19 document does recognise:

- the need to mitigate transport impacts within Ipswich because of planned growth in the overall Ipswich strategic planning area;
- the modal shift strategy that was published by Suffolk County Council during the examination of the Suffolk Coastal Local Plan;
- the quality bus partnership;
- the promotion of smarter choices;
- infrastructure improvements;
- within the central parking core, the achievement of a parking strategy that supports modal shift.

The Local Plan also highlights park and ride provision, particularly the Bury Road park and ride site. The Local Plan also states that a new Ipswich Town centre parking plan will be adopted. Clearly, the Local Plan cannot take account of the yet to be agreed parking plan, but, in order to be effective, greater clarity is needed on how the spatial strategy responds to the recognition in the WYG report that care needs to be taken to ensure that the proposed level of parking does not inadvertently encourage car use.

The plan does follow on from previous policy positions of constraining long stay parking within the central parking core, and that only the operational parking for non-residential development will be allowed. What the WYG report highlights is that, within this central area, there is already more focus on short-stay parking and long-stay car parks are already outside this zone.

The central parking core is defined in the IP1 area policies map and covers the town centre parts of the South East of Ipswich including Cardinal Park and the existing post office site. It also includes the Waterfront area and the University but does not include the areas to the west of the town, the Portman Road parking area, and doesn't include the Crown Street Car Park.

The area to the West of the town centre has predominantly been for long stay parking in association with the office uses and the railway station. Policy DM-22 states that no non-residential long stay car parks will be permitted. What is not clear is whether this is associated with the whole of the IP1 area or just the central parking area. The supporting text does provide some greater clarity on this that it is for central parking core but to avoid inadvertently encouraging car use and increasing congestion, the control of the supply of additional long-stay spaces must be extended to the whole IP1 area.

The IP1 insert map of the Local Plan does identify four points allocated for multi storey car parks: the mint quarter (short stay), Portman Rd (long stay), West End Road (long stay) and at site IP049 near the University (long stay).

The IP1 area insert map does not relate to the policies within the Local Plan document, particularly policy SP17 (town centre car parking). This policy does recognise the aims of supporting the economy, limiting congestion and encouraging use of modes of transport the policy then recognises the central parking core, for which policy DM-22 applies. SP17 then states which of the sites are allocated for multi storey car parks as: the mint quarter car park for short stay (IP048), West End Road (IP015) for long stay and Orwell Quay (IP049) also long stay. The Local Plan does not state that the old cattle market Portman Rd site is allocated, instead it says that the provision of the multi storey car park at West End Road will replace the on-site surface parking including the old cattle market if this is not replaced on site through development on a "like for like" basis.

This seems a logical approach because the old cattle market site is allocated for employment uses therefore the surface parking will be naturally displaced. The site sheet for IP051 does recognise the allocation policy SB05 and SP17.

SP5 refers to land allocated for used as specified in Table 3 and that IP051 will be redeveloped for office (80% of the site) and main town centre uses (20%). It then goes on to say numerically like for like replacement of existing long stay parking provision in this area, which can be assumed to be the site itself. This then means the local plan, in allocating the old Portman Road site for a multi storey long stay parking, is simply to replace the parking provision on the site that is being lost at either this site or at West End Road. The "like for like" replacement approach must be made clearer in the Local Plan otherwise this could undermine the restraint on the provision of long-stay spaces in the IP1 area.

Turning back to policy SB17, the emphasis of the policy is the provision of a long stay multi storey car park at West End Road as the preferred strategy for the replacement of existing long stay parking at Portman Rd (IP 051). If this was not the case, and the preferred strategy would be to replace on site, policy SP17 would be clearly setting this out but then also reflecting that the quantum of spaces would be for replacement reasons only.

Whilst there might be some additional provision during the period between a multi-storey car park being opened and a site being redeveloped, there is not a policy or other mechanism to make this period as short as possible. The County Council's concern is that the additional long-term spaces would be available over a long period of time, which would influence travel behaviour and undermine efforts to encourage people to walk, cycle or use passenger transport.

The continued restriction on operational parking within the central core is welcome. Whilst there is some definition of operational parking through reference to staff parking not being included (para.9.22.8), examples of what would be included would provide a positive position. This could include spaces for deliveries, visitor spaces and potentially spaces for staff who use private transport for visiting clients for example. The county council would welcome the opportunity to discuss how the approach to operational and staff parking within the IP1 area could be effective.

### Flooding and Water Management

#### *Strategic Flood Risk Assessment.*

The County Council has been working with the Borough Council and its consultants in preparing the Strategic Flood Risk Assessment (SFRA) and this collaborative working is appreciated. The SFRA is still currently in draft form and needs further work arising from data to be provided by the Environment Agency. The County Council, as the Lead Local Flood Authority, will assist the Borough in further developing this important piece of evidence, ensuring plan policies are

appropriately justified. Changes will be subject to ongoing work, however, in broad terms, the SFRA would benefit from setting out how development needs to respond to local circumstances and then the policies and site sheets to incorporate the overall results. Some of this information will likely be able to be transferred from the previous SFRA, as well as more location specific advice.

In order to ensure the plan is effective and consistent with national policy, subsequent changes to the plan may be required on completion of the SFRA.

#### *Policy DM4 Development and Flood Risk*

Policy DM4 is not sound because it is not consistent with national policy. NPPF paragraph 165 states "Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate."

Part a) of this policy states development will be approved where:

"It does not increase the overall risk of all forms of flooding in the area or elsewhere through the layout and form of the development and wherever practicable appropriate application of Sustainable Drainage Systems (SuDS)"

Planning practice guidance paragraphs 082 and 083 uses the term "practicable" in reference deciding the most appropriate type, operation and maintenance of SUDS on a site, rather than the principle of whether SUDS should be used on a site. The guidance makes a distinction between the terms "inappropriate" and "practicable". As such, the current wording of the policy is not consistent and could cause confusion.

The words "where practicable" should be removed from the policy.

#### Archaeology

##### *Site IP028b*

This part of the plan is not sound because it is not effective. The text states this site refers to Archaeological Character Zone 2, but the site lies within Archaeological Character Zone 1b, for the Historic Core, and is therefore of a higher sensitivity than indicated on the site sheet. This text should be corrected to ensure that heritage assets are appropriately identified and approached by development.

*The site lies on the edge of the River Gipping, within the likely former extent of the precinct of the medieval Franciscan friary (Greyfriars). There is potential for archaeological remains relating to the friary to survive on the site, as well as earlier occupation on the edge of lower lying marshy land. Within the western part of the site, marsh deposits have been identified, but human remains were recorded during construction of the eastern side of the existing buildings on the site. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). This site likely lies in the former extent of the town-mash. Palaeo-environmental assessment and mitigation for impacts on deeper deposits may be required. Deep excavations may encounter waterlogged features. Stratigraphy may be expected to be particularly deep in former streams and watercourses and waterlogged features are recorded in the Urban Archaeological Database.*

#### *Site sheet information*

While not strictly related to soundness, information on some site sheets could be updated to provide helpful information or improve the accuracy of the information. Amendments are suggested below:

IP011c, the separation of 011 into b and c means some further clarification is required. Amend to: 'The site lies... close to the grade II\* St Mary at Quay Church, ~~contains two scheduled~~ monuments and lies within an area of archaeological importance.' Also amend: 'There is also limited potential for nationally important archaeological remains outside of the ~~scheduled and previously scheduled areas. This is because much of the site has already been excavated in the past. Detailed early Pre-application discussion with Suffolk County Council Archaeological Service is advised and Historic England would be required to agree the scope of required assessment, the principle of development and to inform design.~~'

IP354, the following information could be added:

*The site lies in the vicinity of Roman remains, likely on reclaimed land. The site lies across Archaeological Character Zones 1d and 2a as set out in the Archaeology and Development SPD. It is likely that archaeological considerations could be managed through conditions on consent, although early consultation with Suffolk County Council Archaeological Service is advised.*

IP355, the following information could be added:

*The site lies in the vicinity of Roman remains, likely on reclaimed land. The site lies across Archaeological Character Zones 1d and 2a as set out in the Archaeology and Development SPD. It is likely that archaeological considerations could be managed through conditions on consent, although early consultation with Suffolk County Council Archaeological Service is advised.*

ISPA 4.1, the following information could be added:

*These large greenfield areas have not been previously systematically investigated for archaeological remains. Archaeological evaluation should be undertaken to inform planning applications, comprising a combination of desk-based assessment, geophysical survey and an appropriate level of trial trench archaeological evaluation (see character zone 2c in Archaeology and Development SPD).*

IP089

This site is a large area ~~in~~ on the edge of the Anglo-Saxon and Medieval core and within the Area of Archaeological Importance (IPS 413).

---

I hope that these comments are helpful. Please contact me via the contact details at the top of this letter, if I or my colleagues can be of any assistance.

Yours faithfully,

Cameron Clow,  
Senior Planning and Growth Officer,  
Strategic Development,  
Growth, Highways and Infrastructure

This submission is unconfirmed

[26244]

## Object Policy DM11 Countryside

Respondent: Suffolk Preservation Society (Bethany Philbedge) [1352]

Received: 26/02/2020 via Web

The Suffolk Coasts and Heaths Area of Outstanding Natural Beauty is only referred to in policy DM11 in terms of major development within the AONB. The policy should relate to all development both in, and within the setting of, the AONB. We suggest that the policy is reworded so that it is clear that it fulfils the statutory duty under section 85 of the 2000 CROW Act.

**Changes to plan:** We suggest that the policy is reworded so that it is clear that it fulfils the statutory duty under section 85 of the 2000 CROW Act which requires that 'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'.

Document is not legal

Document is not sound

Representation at examination: Written Representation

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**

**e-mail:**

**planningpolicy@ipswich.gov.uk**

**Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.**

**website:**

**www.ipswich.gov.uk**



Consultation document(s) to which this comments form relates:	<b>Core Strategy and Policies Development Plan Document Review-Final Draft</b> <b>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review – Final Draft</b> <b>Site Sheets Part 2 – IP080-ISPA 4.1</b> <b>Plan 5 – Ipswich Ecological Network</b>
Please return this comments form to:	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	<b>Part A – Personal details</b>  <b>Part B – Your comment(s).</b>

#### PART A PERSONAL DETAILS

	1. Personal details	2. Agent's details (if applicable)
Title	Ms	
First name	Jill	
Last name	Crighton	
Job title ( <i>where relevant</i> )	Conservation Planner	
Organisation ( <i>where relevant</i> )	Suffolk Wildlife Trust	
Address (Please include post code)	Brooke House The Green Ashbocking Ipswich IP6 9JY	
E-mail		
Telephone No.		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Suffolk Wildlife Trust
--	------------------------

Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<b>Core Strategy and Policies Development Plan Document Review-Final Draft Chapter 5. Section 5.26, Table 2.</b>	<p>Biodiversity Section currently states – “The need to halt biodiversity net loss.”</p> <p>Suggest this is amended to state - “Prevent loss of biodiversity and Implement measures for biodiversity net gain”</p> <p>The government is mandating that, through the new Environment Bill, all development (with a few exceptions) will be required to secure gains in biodiversity. It is therefore not sufficient to state that there will be a halt in net loss.</p>
<b>Core Strategy and Policies Development Plan Document Review-Final Draft Chapter 6, Objective 9.</b>	<p>“9. NATURAL ENVIRONMENT – To protect and enhance high quality, accessible strategic and local open spaces rich in biodiversity and geodiversity for people to visit and use.”</p> <p>Consider addition of reference to ecological networks and connectivity. NPPF references the need to establish, conserve, restore and enhance ecological networks under Paragraphs 173-d. and 174-b.</p>
<b>Core Strategy and Policies Development Plan Document Review-Final Draft Policy DM8</b>	<p>With regards to development which could have an impact on an SSSI, Policy DM8 conflicts with the NPPF.</p> <p>DM8 states that “Sites of Special Scientific Interest (SSSI) will be protected from development, which directly or indirectly would have an adverse effect on their natural value. An exception will only be made where a proposed development:</p> <ul style="list-style-type: none"> <li>a. could not be located on an alternative site that would cause less harm;</li> <li>b. would deliver benefits that clearly outweigh the impacts on the site’s special interest and on the national network of such sites; and</li> <li>c. would compensate for the loss of natural capital.”</li> </ul> <p>Conditions a. and c. clearly conflict with Paragraph 175b of the NPPF which only allows for Condition b. (benefits outweighing impacts).</p> <p>This Policy should be updated to reflect this.</p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
<b>Core Strategy and Policies Development Plan Document Review-Final Draft Policy DM12</b>	In Policy DM12, point d. there should be an inclusion of the potential for installation of green roofs and walls as part of the strategy to introduce greener streets and spaces. This would make a more robust argument for the requirement for net gains in biodiversity.
<b>Core Strategy and Policies Development Plan Document Review-Final Draft Policy DM15</b>	<p>We have been informed by the RSPB that a suggestion was made to add a further point to DM15 – Tall Buildings with regards to the provision of swift bricks in new buildings.</p> <p>This is a sentiment we share at the Suffolk Wildlife Trust, and we note that there are no references to Green Space or biodiversity measures within this policy, which appears to be a valuable missed opportunity.</p> <p>We propose the addition of a further point: k. to incorporate integrated swift bricks”.</p> <p>In addition to this, other biodiversity features could be noted here, such as the provision of green walls and roofs which would help meet the biodiversity net gain requirements.</p>
<b>Core Strategy and Policies Development Plan Document Review-Final Draft Policy DM17</b>	In addition to the points made under Policy DM17 regarding small scale residential developments for infill, backland or severance plots, a point should also be made to deny permission for any development which could result in an unacceptable loss of semi-natural habitat, which could be important in its own right, or support protected and/or priority species.
<b>Core Strategy and Policies Development Plan Document Review-Final Draft Policy ISPA2</b>	Strategic Infrastructure Priorities - We consider that policy ISPA2 should also include delivery of strategic green infrastructure alongside the other types of infrastructure listed.
<b>Site Allocations and Policies (Incorporating IP- One Area Action Plan) Development Plan Document Review – Final Draft Site Sheets Part 2 – IP080-ISPA 4.1</b>	<p>Policy DM10 of the Core Strategy and Policies Development Plan Document Review-Final Draft seeks to maintain and enhance green corridors and find opportunities to link existing green corridors.</p> <p>However, two of the sites proposed for development, IP143 and IP067b, currently make up quite a substantial part of Green Corridor F, forming the semi-natural habitat link between the south-western boundary of Landseer Park Carr County Wildlife Site (CWS) and the western boundary of the Volvo Raeburn Road CWS. If these sites are fully developed, this ecological network would be interrupted.</p>

<b>Document(s) and document part.</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>
<b>In association with Plan 5 – Ipswich Ecological Network and Plan 6 – Green Corridors</b>	<p>Green Corridor F is the longest existing ecological network in Ipswich, and if sensitive development is undertaken in the Ravenswood area (Sites IP150b, c, d, e and IP152), maintaining a good proportion of the existing habitat, then this corridor could be continued to the east.</p> <p>This network would begin at Holywells Park, continue through Landseer Park, Sites IP143 and IP167b to Volvo Raeburn Road Site, Piper's Vale, Brazier's Wood, Pond Alder Carr and Meadow and fork at Bridge Wood (on the opposite side of A14) continuing to the River Orwell to the south and via Sites IP150b, c, d, e and IP152 onwards to Foxes Pit, Fox Farm Meadows and surrounding woodland blocks across the A14 to the east.</p> <p>We are pleased to see that so many of the recommendations from the Ipswich Wildlife Audit 2019 have been taken into account.</p>
<b>Plan 5 – Ipswich Ecological Network</b>	This map refers to Wildlife Audit 2012/2013, which is not the most up-to-date Audit as a further Audit took place in 2019.

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

**Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.**

### **RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

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**Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.**

**Adoption of the Ipswich Local Plan Review.**

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As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

**Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.**

**The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.**

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

T



**Felicia Blake**

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**From:** Gavin Jones  
**Sent:** 03 March 2020 09:41  
**To:** Felicia Blake  
**Subject:** FW: CC179790835: General Enquiry Received: Planning & Development

This might be a Local Plan rep.

**From:** Ipswich Borough Council <talbotclaire@hotmail.com>  
**Sent:** 02 March 2020 22:01  
**To:** Development Management <Development.Management@ipswich.gov.uk>  
**Subject:** CC179790835: General Enquiry Received: Planning & Development

# MY IPSWICH

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**Ref No:** CC179790835

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Dear Colleague,

A customer has submitted an online 'General Enquiry' form for your service area. Please find the details of the 'General Enquiry' listed below.

---

**Service area:** Planning & Development

**Details of enquiry:** In response to consultation of Ravenswood re: housing and skate park plans. The split between private and social housing needs to be in line with the rest of the estate. We do not want a repeat of the UVW situation where the land was earmarked 100% social. Traffic issues need to be considered, traffic already backs up daily at the McDonald's roundabout before additional housing. So would there be another entrance/exit? Concerns over disruption to and loss of wildlife. Instead of a skate park, an extension of the country park would give a space for recreation as well as maintaining wildlife.

---

**Customer Details:**

**Name:** Claire Talbot

**Email Address:** [talbotclaire@hotmail.com](mailto:talbotclaire@hotmail.com)

**Contact Number:**

**Address:**

---

**What you need to do next?**

- The customer has been advised that you will respond directly to them within 5 working days.
- 

Kind Regards

Customer Services

---

**\*\*\* THIS IS AN AUTOMATED EMAIL: This email address is unable to take replies \*\*\***

**Date and time of enquiry: 2020-03-02 22:01:07**

**From:** Tom Clarke  
**Sent:** 24 February 2020 16:34  
**To:** PlanningPolicy  
**Subject:** Consultation response - Theatres Trust  
**Attachments:** 20200224 Ipswich SAP Comments - Theatres Trust.doc; 20200224 Ipswich CS Comments - Theatres Trust.doc

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good Afternoon

Please find attached representations on behalf of the Trust for the current Core Strategy and Site Allocations consultations.

Kind regards,

**Tom Clarke MRTP**  
National Planning Adviser

**Theatres Trust**  
22 Charing Cross Road, London WC2H 0QL

---

W [theatrestrust.org.uk](http://theatrestrust.org.uk)

# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 2<sup>nd</sup> March 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	<b>CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT REVIEW– FINAL DRAFT</b>
Please return this comments form to:	<p><u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or</p> <p>Planning Policy Team        Planning and Development        Ipswich Borough Council        Grafton House        15-17 Russell Road        Ipswich        IP1 2DE</p>
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	<p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
Title	Mr	
First name	Tom	
Last name	Clarke MRTPI	
Job title ( <i>where relevant</i> )	National Planning Adviser	
Organisation ( <i>where relevant</i> )	Theatres Trust	
Address <i>(Please include post code)</i>	22 Charing Cross Road London WC2H 0QL	
E-mail	<u><a href="mailto:planning@theatrestrust.org.uk">planning@theatrestrust.org.uk</a></u>	
Telephone No.		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Tom Clarke MRTPI, Theatres Trust
--	----------------------------------

Please specify which document(s) and document part you are commenting upon.

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Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Policy DM28	<p>The Trust is supportive of this policy and the protection afforded to the borough's valued facilities. We would suggest a minor amendment to Appendix 6 to further improve its robustness reflecting comments we submitted at the previous stage. We suggest paragraph 2.2 requires applicants to market the property through recognised national, regional and local agents, websites and publications appropriate to the type of facility. This would prevent applicants undermining the policy objective by superficially addressing policy, for example listing with small agents in other parts of the country or listing commercial property with residential agents. We otherwise consider this policy to meet the tests of soundness.</p>

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

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**Planning and Compulsory Purchase Act 2004**

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## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

Consultation document(s) to which this comments form relates:	<b>SITE ALLOCATIONS AND POLICIES (INCORPORATING IP-ONE AREA ACTION PLAN) DEVELOPMENT PLAN DOCUMENT REVIEW – FINAL DRAFT</b>
Please return this comments form to:	<u><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a></u> or  Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	<b>11.45pm Monday 2<sup>nd</sup> March 2020</b>
This form has two parts:	Part A – Personal details  Part B – Your comment(s).

#### PART A PERSONAL DETAILS

	1. Personal details	2. Agent's details (if applicable)
Title	Mr	
First name	Tom	
Last name	Clarke MRTPI	
Job title ( <i>where relevant</i> )	National Planning Adviser	
Organisation ( <i>where relevant</i> )	Theatres Trust	
Address (Please include post code)	22 Charing Cross Road London WC2H 0QL	
E-mail	<a href="mailto:planning@theatrestrust.org.uk">planning@theatrestrust.org.uk</a>	
Telephone No.		

**PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation**

Your name or organisation ( <i>and client if you are an agent</i> ):	Tom Clarke MRTPI, Theatres Trust
--	----------------------------------

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Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Opportunity Area C – Mint Quarter / Cox Lane regeneration area and surrounding area	As articulated at the previous stage we are supportive of these plans and of enhanced linkages to the Regent Theatre. We consider this to meet the tests of soundness.
Opportunity Area E – Westgate	We are also supportive of development at this site, although as set out previously we would encourage the principles to include engagement with the Trust given the potential for impact on New Wolsey Theatre. We otherwise consider this to meet the tests of soundness.
Policy SP15 Improving Pedestrian and Cycle Routes	We are supportive of this policy and consider it to meet the tests of soundness.

## **PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2<sup>nd</sup> March 2020.

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## Felicia Blake

**From:** Matthew Sobic ·  
**Sent:** 02 March 2020 18:15  
**To:** PlanningPolicy  
**Cc:** Michael Hammond; Banks, Alice  
**Subject:** Ipswich Local Plan Review

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir or Madam,

We write on behalf of Threadneedle UK Property Authorised Investment Fund who is the owner of a significant area of Ipswich town centre between Tavern Street and Buttermarket.

We have been in discussions with Michael Hammond of your office over the drafting of Policy DM27 that relates to the 'Central Shopping Area'. We note that efforts have been made by the Local Planning Authority to reflect the representation submitted on behalf of Threadneedle and dated 5 August 2019, which take a step forward to allowing a greater flexibility of uses within the Central Shopping Area.

Whilst we consider that greater flexibility could be achieved within the wording of draft Policy DM27 to ensure future town centre vitality and viability, we understand that the Council will take a pragmatic approach to future applications that exceed the proposed thresholds depending on the situations faced by the retail market and this is embedded within the draft wording of Policy DM27.

However, and whilst we support the direction of travel that the Local Planning Authority is taking, we consider a very subtle change should be made to the policy position for the Primary Shopping Zones. Our subtle changes are underlined bold in the below text copied from draft Policy DM27 as follows:

*'The Council will not grant planning permission for the use of a ground floor unit to a use falling outside classes A1 to A5, D2 and G1 in Primary Shopping Zones...'*

D2 and C1 uses can contribute to the vitality and viability and mix of shopping areas and enable upper floors to be brought into use, but will require ground floor accesses. Such uses can provide active frontages and therefore should not be excluded from the operations permitted in the Primary Shopping Zone, which is subject to a threshold policy in any event.

We trust the above minor modification will be made and I would be grateful if you could confirm by return that it will be. The risk not making the above subtle change could be to result in vacant properties and underutilised space in the town centre that would otherwise contribute to its vibrancy.

I look forward to hearing from you.

Yours faithfully

Matt

Matthew Sobic

Director

Planning

Savills, Belvedere , 12 Booth Street , Manchester M2 4AW

Tel

Mobile :

Email :

savills Website : <http://www.savills.co.uk>



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**BEWARE OF CYBER-CRIME:** Our banking details will not change during the course of a transaction. Should you receive a notification which advises a change in our bank account details, it may be fraudulent and you should notify Savills who will advise you accordingly.

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**U**



This submission is confirmed

[26325]

**Support Site Sheets, Site Ref: IP355 (Policy SP2) Cullingham Road**

**Respondent: Universal Property Services Ltd (Mr Daniel Fermor, Director) [2564]**

**Received: 02/03/2020 via Web**

- 1)Positive re-use of a brownfield site, within a predominantly residential area.
- 2)The site will allow for a comprehensive and controlled re-development of the area including geographically linked sites IP279a, b(1) and b(2) – Former British Telecom Office, Bibb Way and IP003 Waste Tip at Sir Alf Ramsey Way all within close proximity to IP355.
- 3)The site will allow for cycle path aspirations linking the site to Bibb Way.
- 4)10m EA River corridor buffer zone will remove 50% of the site & render the site nonviable.
- 5)Higher density will need to be considered to ensure viability and linked aspirations.

**Representation at examination:** Appearance at the examination

**Reason for appearance:** To be fully informed of impact on the proposed site.

Representations made in accordance with Regulations  
20 – In Alphabetical Order

**Full Redacted Representations**

**W**



**Felicia Blake**

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**From:** Cllr Sarah Barber  
**Sent:** 28 January 2020 17:14  
**To:** Martyn Fulcher  
**Subject:** local plan consultation

Dear Martyn,

Sally Wainman, /has contacted me directly to raise her concerns about the change to the local plan in Ravenswood off Alnesbourne Crescent. Sally is concerned that the new residents will put pressure on the resources off the local GP surgery.

Kind regards, Sarah

**Cllr Sarah Barber**  
IBC Cllr for Priory Heath ward  
Portfolio holder for the Town Centre  
07817286957

**From:** Chris Warhurst <  
**Sent:** 26 January 2020 12:18  
**To:** PlanningPolicy  
**Subject:** OBJECTION - Proposed Local Planning Site IP150d

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir

To whom it may concern,

**PROPOSED LOCAL PLANNING SITE ALLOCATION - IP150d (UC267)**

I have been made aware, through public notice that a proposed local planning site allocation (IP150d) is being considered. Having written to you on 2 separate occasions with regard to further development in this area, and had no response I find this particularly alarming.

I would like to formally state my objection to this proposed development on the following grounds.

**Environmental**

- Skylarks have been seen nesting on this area
- Bee orchids have been seen flowering in this area - which is protected under Section 13 of the Wildlife and Countryside Act (1981).

These are 2 rare and protected species. Building in this area

**Sustainability - Traffic Infrastructure**

The traffic connection at the main roundabout which provides the only access to and from the Ravenswood estate is beyond breaking point. Current residents experience over 30 min traffic jams getting in and out of the estate over the following periods:

- When access the Macdonalds restaurant is in high demand
- During school drop off times
- During school collection times
- During delivery times for Lidl supermarket - articulated trucks
- During delivery times for Macdonalds - articulated trucks
- Peak commuter times
- Any time the main roundabout is congestion

**Sustainability - Local Amenities**

- Local Doctors Surgery waiting times are excessive and beyond capacity
- Local Dental Surgery waiting times are excessive and beyond capacity
- School class sizes are excessive and beyond capacity

- Sewage capacity at Ravenswood is at capacity and requires upgrading
- Storm water runoff is at capacity - which has resulted in a number of local floods during high rainfall

Warmest Regards

Chris Warhurst

This submission is **confirmed**

[26290]

### Support Policy CS11 Gypsy and Traveller Accommodation

Respondent: [\*\*West Suffolk \(Forest Heath District Council and St Edmundsbury Borough Council\) \(Amy Wright\) \[2556\]\*\*](#)

Received: **02/03/2020 via Web**

This policy seeks to “provide for additional pitches... where sites cannot be found within the Borough, the Council will work with neighbouring authorities to secure provision”... This appears to be positively prepared. West Suffolk Council supports the provision of appropriate pitches to meet the identified need which will be secured through the policy.

**Representation at examination:** Written Representation

This submission is **confirmed**

[26291]

### Support Policy CS20 Key Transport Proposals

Respondent: [West Suffolk \(Forest Heath District Council and St Edmundsbury Borough Council\) \(Amy Wright\) \[2556\]](#)

Received: **02/03/2020 via Web**

“Key transport proposals needed to mitigate the traffic impacts within Ipswich of planned growth...” In order to be effective, it is suggested that criteria (i) is added, “improvements to the rail line.” This will enable matters such as the Ipswich to Cambridge rail line to remain a strategic priority. The East West Rail Eastern Section Group is actively working to increase passenger rail frequencies.

**Representation at examination:** Written Representation

**Felicia Blake**

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**From:** Will Dowe  
**Sent:** 10 February 2020 21:00  
**To:** PlanningPolicy  
**Subject:** Alnesbourn Crescent Planning Proposal

Good afternoon

I am emailing to express my concern at the council's proposal to allow the grassland area adjacent to Alnesbourn to be used for housing.

This area of land borders an AONB which would be negatively affected by additional vehicular traffic in the area.

The existing access track to Bridge Wood/Orwell Meadows/Hallowtree Campsite is already in disrepair.

Additional traffic in the area would be at the detriment to the properties in the Alnesbourn Priory site.

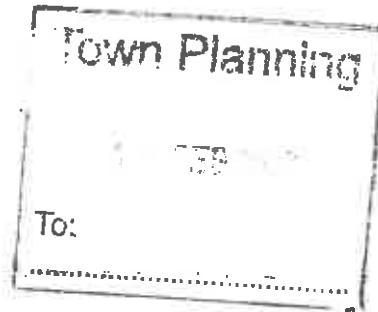
It is a short-sighted effort by the council to boost housing in an area which is unequipped to handle the additional capacity.

No work should be allowed to take place. The land must be kept undisturbed which will allow the flora and fauna to develop. This will bring far more value to the people living and working in that area.

Yours sincerely,

Will Dowe  
Hallowtree Scout Activity Centre

Ipswich Borough Council  
Planning and Development Department  
Grafton House  
15-17 Russell Road  
Ipswich  
Suffolk  
IP1 2DE  
February 12<sup>th</sup> 2020



Dear Sirs

Subject – Site ref IP354 – 72 (Old Boatyard) Cullingham Road Ipswich

With reference to the Proposed Local Plan Site Allocation Notice posted in connection to the above address, we would strongly object to the proposal to build 24 residences for the following reasons –

1) Traffic

Cullingham Road is built with mainly terraced houses which do not have off-road parking and therefore there are cars parked on either side of the road on a regular basis creating difficulty in access for large lorries and delivery trucks , even the refuse lorry has experienced problems in getting down the road when cars are parked haphazardly.

Any new housing being considered ,even allowing for the fact that presumably car parking would be factored into the new site, would add more additional parking problems to those which we already have , bearing in mind that these days more residences have two vehicles.

Additional traffic would also cause problems exiting Cullingham Road onto Handford Road as the "Keep Clear" sign which was painted onto the road by the Council has worn away and not been re-painted.

Car parking aside , there would be additional problems with demolition/construction vehicles being able to access the site safely ,due to the narrow entrance, adding yet more mayhem for the residents together with additional traffic pollution problems.

2) Wildlife disruption

The canal bank is home to a variety of wildlife including birds, waterfowl , squirrels and a family of foxes . We have even had a small deer wandering along the bank and as our flat in Elizabeth Court has a clear view along the canal bank , we have been

fortunate to enjoy watching all these. This would not be the case if a housing estate were to be built.

We need to encourage wildlife not effectively destroy their habitat by building an estate.

3) Health and Wellbeing

The site had previously been a machinery business which ,when the working day ended , would be closed and the area would be quiet . Having a housing estate right on our doorstep, which it would be as Elizabeth Court is surrounded on two sides by the site, would cause us noise and disruption.

We trust that our views will be taken into consideration during the public consultation period.

Yours faithfully

Mrs Carole Williamson

Mr Christopher Williamson



# **Public Consultation for the Ipswich Local Plan Review Final Draft**

**15<sup>th</sup> January 2020 – 26<sup>th</sup> February 2020**

**Planning and Compulsory Purchase Act 2004**

**Town & Country Planning (Local Planning) (England) Regulations 2012 (Regulations 19)**

## **Consultation Comments Form**



**IPSWICH  
BOROUGH COUNCIL**

e-mail:  
[planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Planning Policy Team  
Planning and Development  
Ipswich Borough Council  
Grafton House  
15-17 Russell Road  
Ipswich  
IP1 2DE.

website:  
[www.ipswich.gov.uk](http://www.ipswich.gov.uk)

<b>Consultation document(s) to which this comments form relates:</b>	<p><b>Ipswich Local Plan Review Final Draft Consultation</b></p> <p><b>Policy CS10 Ipswich Garden Suburb – Access &amp; Movement</b></p> <p><b>Improvements to Fennereau Way (north section to Lower Rd)</b></p>
<b>Please return this comments form to:</b>	<p><a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or</p> <p>Planning Policy Team        Planning and Development        Ipswich Borough Council        Grafton House        15-17 Russell Road        Ipswich        IP1 2DE</p>
<b>Return by:</b>	<b>11.45pm Wednesday 26<sup>th</sup> February 2020</b>
<b>This form has two parts:</b>	<p><b>Part A – Personal details</b></p> <p><b>Part B – Your comment(s).</b></p>

<b>PART A PERSONAL DETAILS</b>		
	<b>1. Personal details</b>	<b>2. Agent's details (if applicable)</b>
<b>Title</b>	Mrs	
<b>First name</b>	D	
<b>Last name</b>	Wiseman	
<b>Job title (where relevant)</b>		
<b>Organisation (where relevant)</b>		
<b>Address (Please include post code)</b>		
<b>E-mail</b>		
<b>Telephone No.</b>		

## PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation (and client if you are an agent):	
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Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Table 8B Access & Transport	<p>The purpose of Table 8B is to set a clear steer on what Infrastructure should be provided.</p> <p>Under Access &amp; Transport there is provision for Infrastructure improvements to Fonnereau Way (complete section linking railway line and Lower Road). It is not clear whether this provision relates to the exiting route as it currently is defined or whether this will be an amended route within the country park itself.</p> <p>This representation makes reference only to the section that cuts through the residential dwelling known as Broadacres.</p> <p>National Legislation relates directly in this regard.</p> <p>The National Planning Policy Framework states in Paragraph 58: that "Planning policies and decisions should aim to ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion", and Paragraph 69: states "Planning policies and decisions, in turn, should aim to achieve places which promote: Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life and community cohesion".</p> <p>Section 17 of the 'Crime and Disorder Act 1998' places a duty on Ipswich Borough Council 'to exercise its various functions with due regard to the likely effect of the exercise of those functions on and the need to do all that it reasonably can to prevent crime and disorder in its area to include anti-social behaviour, substance misuse and behaviour which adversely affects the environment'. This rationale is further endorsed by the content of PINS 953.</p> <p>In the SPD any planned enhancement to the Northern end of the Fonnereau Way at Broadacres would not meet the policies stipulated in the Crime and Disorder Act 1998 and the NPPF.</p> <p>As it stands, the existing way at Broadacres does not meet the policies stipulated in the Crime and Disorder Act 1998 and the NPPF and promotes opportunistic crime and anti-social behaviour. Crime and disorder occur because Broadacres is</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>publicly accessible, has no defined perimeter fencing and the area is not overlooked meaning this is an isolated concealed home, that has already suffered unreasonable levels of crime and vandalism, all of which has been documented by Suffolk Police.</p> <p>The Suffolk Police Designing Out Crime Officer, in her letter to IBC in August 2016 stated that "To ensure that crime prevention is properly taken into account, it is important that the way in which permeability is provided is given careful consideration. High permeability is conducive to walking and cycling, but can lead to problems of anti-social behaviour if it is only achieved by providing routes that are poorly overlooked, such as rear alleyways." It is therefore important that footpaths and access points are kept to a minimum and are subject to maximum possible levels of natural (and formal if necessary) surveillance"</p> <p>The SPD Master Plan defines a proposed network of footpaths, part of which runs parallel to the section referred to above with an enhanced exit/entrance onto Lower Road. The proposed new entrance gives safer pedestrian access, including disabled access, will have defined perimeters, allow open natural surveillance and will lead directly into the park, meeting the policies defined in the NPPF and the Crime and Disorder Act 1998. This therefore provides an opportunity to phase out the route through Broadacres and eradicate the threat of increased crime, vandalism and anti-social behaviour because the route proposed remains solely within the confines of the Country Park and the policies on which that is created.</p>

**PART B CONTINUED – Comments about the Ipswich Local Plan Review Final Draft**

<b>Document(s) and document part</b>	<b>Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)</b>

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Wednesday 26<sup>th</sup> February 2020.

**RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN**

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination.

Publication of the Planning Inspector's Report on the Ipswich Local Plan Review.

Adoption of the Ipswich Local Plan Review.

**PRIVACY NOTICE**

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the

creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

