

## Ipswich Core Strategy Examination

### Hearing Statement Matter 9: Transport and accessibility

21 June 2016

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## **MATTER 9 – Transport and accessibility**

### **1.0 INTRODUCTION**

- 1.01 This hearing statement is submitted on behalf of CBRE SPUK III (No.45) Ltd and Mersea Homes Ltd.
- 1.02 CBRE SPUK III is the owner of land south of the railway, west of Westerfield Road (excluding land controlled by Ipswich School), and forming part of the Ipswich Garden Suburb. The land is subject to an allocation for residential-led development under Policy CS10 of the extant adopted Core Strategy (2010). It is known as the 'southern neighbourhood' or 'Fonnereau Village' under the terms of the emerging SPD for the Ipswich Garden Suburb ('IGS'). A planning application for this land was submitted in June 2014 and remains to be determined.
- 1.03 Mersea Homes have a promotional agreement with CBRE SPUK III (No.45) Ltd, but separately own land to the east of Westerfield Road (forming the substantive part of the 'Eastern Neighbourhood' or 'Red House village' site). That land is proposed to be allocated for development under Policy CS10 as is now proposed by the Council in the Core Strategy now before the Inspector.

### **2.0 RESPONSE TO THE INSPECTOR'S QUESTION**

*Question 4.1: Are the policies and proposals in connection with transport and accessibility soundly based? If you contend that they are not how should they be modified?*

- 2.01 It is our view that policy DM17 is not soundly based as considered against the provision of paragraph 182 of the National Planning Policy Framework ('NPPF'). We have consistently raised objection at previous stages of the plan making process, and do so again now. We consider that elements of the proposed policy are:
- Not supported by adequate or appropriate evidence base (therefore not **justified**).
  - Not **effective** insofar as the policies will not provide deliverable outcomes.
  - Not **consistent with national planning policy** in relation to specific matters.

#### ***Policy DM17***

- 2.02 Policy DM17 includes requirements for new development to incorporate electric car charging points and a car club scheme, provision for cyclist showers and lockers for commercial development of over 1,000sqm, and to ensure provision of services, infrastructure and tickets to support public transport patronage.
- 2.03 Core Document LPCD26 undertakes whole-plan viability testing. It makes provision for a blanket S106 contribution on a per-dwelling basis, but offers no explanation or itemisation of how those costs have been calculated or the assumptions therein.
- 2.04 We cannot, therefore, be certain that the costs associated with provision under Policy DM17 has been taken into account.
- 2.05 The NPPF is very clear on the issue of planning obligations and their potential effect on viability. Paragraph 173 makes it clear that plans should be deliverable, and that the full range of costs, including standards and infrastructure contributions, must be taken into account. It is not clear to us that the provision of DM17 have been assessed in that way.
- 2.06 We recommend that clauses (c), (e) and (f) are struck out, or that, at minimum, a clear proviso is set out in Policy DM17 ensuring that viability will be taken into account in applying policy provisions.