

Ipswich Borough Council Local Plan Review

Topic Paper: Ipswich Garden Suburb

Evidence relating to the Ipswich Garden Suburb proposals

January 2019 (regulation 18 stage preferred options consultation)



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Introduction

What the Council is doing

1. The Council is currently preparing a review of its adopted Core Strategy and Policies Development Plan Document (DPD) (February 2017) and Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD (February 2017). These documents form the Council's Local Plan, which guides future development in the Borough.
2. Draft preferred options versions of the two plans are published for informal public consultation between 16th January – 13th March 2019, under regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
3. The Core Strategy and Policies DPD Review (hereinafter referred to as the Core Strategy Review) will replace the adopted Core Strategy and Policies DPD review when adopted (anticipated in late 2020).
4. The Site Allocations and Policies (incorporating IP-One Area Action Plan) DPD Review (hereinafter referred to as the Site Allocations Plan Review) will replace the adopted Site Allocations Plan when adopted (anticipated in late 2020).
5. The Council is undertaking a public consultation on the Core Strategy Review Preferred Options, the Site Allocations Plan Review Preferred Options and their supporting sustainability appraisal and appropriate assessment reports. The consultation period will run from Wednesday 16th January to Wednesday 13th March 2019 and further details can be found on the Council's website, www.ipswich.gov.uk/currentconsultations, at the Council's offices at Grafton House and the Customer Services Centre at the Town Hall, or in the County Library on Northgate Street.

National Planning Policy Framework – Plan Making

6. The National Planning Policy Framework (NPPF) was introduced in March 2012 following the introduction of the Localism Act in November 2011. The NPPF was revised in July 2018, implementing reforms announced previously through the Housing White Paper, the 'Planning for the Right Homes in the Right Places' consultation and the draft revised NPPF consultation. The NPPF is national planning policy and Local Plan documents such as the Core Strategy must refer to the principles established in the document.
7. The NPPF states in paragraph 35 that Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are deemed to be sound if they are; positively prepared, justified, effective and consistent with national policy.
8. The Duty to Cooperate was introduced through Section 110 of the Localism Act 2011 in November 2011. It is a legal duty on local planning authorities to cooperate constructively, actively and on an ongoing basis with neighbouring authorities, county councils and other prescribed bodies in planning for strategic, cross boundary matters. Paragraph 25 of the NPPF requires strategic policy-making authorities to collaborate

and identify the relevant strategic matters which they need to address in their plans. Ongoing joint-working is seen as critical to the production of positively prepared and justified strategies and helps to determine where additional infrastructure is necessary, and whether development needs that can't be met wholly within a particular plan area could be met elsewhere. To demonstrate this, paragraph 27 of the NPPF states that strategic policy-making authorities should prepare and maintain Statements of Common Ground to document the cross-boundary matters being addressed and progress in cooperating to address these.

9. The NPPF makes clear that plans should apply a presumption in favour of sustainable development, meaning that plans should positively seek opportunities to meet the development needs of their area, be sufficiently flexible to adapt to rapid change and provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. The exceptions to this are if assets or areas of particular importance provides a strong reasons for restricting development or any adverse impacts of doing so would significant and demonstrably outweigh the benefits, when assessed against the policies in the NPPF.

National Policy Context

10. The presumption in favour of sustainable development requires that strategic policies should as a minimum provide for objectively assessed needs for housing. Paragraph 72 of the NPPF states that *“the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.”*
11. Paragraph 72 (c) of the NPPF continues that in achieving this *“set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided.”*
12. This paper sets out how the policies and strategic allocation in north Ipswich for housing and associated facilities through policy CS10 of the Core Strategy Review Preferred Options will assist the Council to meet the objectively assessed housing need for Ipswich.
13. The Council has also produced and adopted an Ipswich Garden Suburb supplementary planning document (SPD), which will guide the proposed development of a strategic site allocation in north Ipswich (adopted 22nd March 2017). The Core Strategy Review seeks to allocate this strategic site for approximately 3,500 dwellings and associated facilities including schools, shops, community facilities and a country park. The SPD provides more detail particularly around the character and layout of proposed development.

Background

14. Over recent years urban regeneration objectives have led the Council to focus development into central Ipswich. This has supported the successful regeneration of the Waterfront and Portman Quarter, introducing a greater range of uses into each, thereby adding to their diversity and vibrancy. This strategy has seen significant

redevelopment of previously developed sites within the town (including 93% of all housing between 2001 and 2014).

15. There is concern that the previously developed sites towards the centre of Ipswich are unlikely to meet the overall demand for future housing needs both in type and the number of dwellings and as such other land must be considered. 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. The land is located on the northern edge of the urban area and is known as the Ipswich Garden Suburb (also known as the Northern Fringe).
16. The Council's adopted Core Strategy and Policies Development Plan Document (DPD) (22nd February 2017) allocates the Ipswich Garden Suburb land (195 ha) to be developed comprehensively as a garden suburb comprising of three neighbourhoods with the delivery of 3500 dwellings and other land uses to support the level of housing. The entire Ipswich Garden Suburb site (195 ha) was identified as a strategic site allocation on the proposals map and continues to be allocated in the Preferred Options proposals map.
17. The detailed infrastructure requirements of the development are set out in Table 8b of Core Strategy – Strategic and Neighbourhood Infrastructure Requirements for the Ipswich Garden Suburb (formerly Northern Fringe).
18. The Ipswich Garden Suburb area is defined as the main and key component of the source of supply of housing land in Ipswich during the plan period and represents a major urban extension to the town.
19. An over-arching framework in the form of a supplementary planning document (SPD) has been adopted for the whole of the Ipswich Garden Suburb area to ensure that any early phases of development fit in with an area-wide plan, make provision for infrastructure, and avoid a piecemeal approach. The Council prepared the IGS SPD in consultation with the local community, the landowners and a wide range of outside agencies including Suffolk County Council, Suffolk Coastal District Council, NHS Suffolk, Anglian Water, Natural England, Sport England, the Environment Agency, and Suffolk Wildlife Trust. The document was adopted by the Council on 22nd March 2017.

Core Strategy and Policies Development Plan Document (DPD) Review Preferred Options

20. The adopted Core Strategy and Policies DPD has been reviewed and has been amended to ensure the alignment of the Core Strategy with the policies of the NPPF, and legislative requirements contained within the Localism Act.
21. Policy CS10 identifies the development of an area of 195 ha of land known as Ipswich Garden Suburb to form a key component of the supply of housing in Ipswich during the plan period. The policy sets out land uses, with approximate areas, to be delivered. The detailed strategic neighbourhood infrastructure requirements of the development are set out in Table 8B.
22. The Core Strategy Review has resulted in one amendment to Policy CS10. The Preferred Options version of Policy CS10 refers to the Ipswich Garden Suburb Supplementary Planning Document as an adopted document. This highlights the

importance of a comprehensive development with the supporting infrastructure to be developed with the Garden City principles.

23. The Preferred Options version of Policy CS10 includes changes to the supporting text which do not alter the context but reflect the NPPF (July 2018), proposed changes to the Local Plan Policies, the adoption of the IGS SPD and clarification of the Policy CS10.
24. Policy CS10 sets out that the Council will seek 31% affordable housing overall at the Ipswich Garden Suburb. Policy states that each phase of development will be subject to a cap of 35% affordable housing. The supporting text expands upon what is regarded as a 'phase' for the purposes of applying the affordable housing cap part of the policy correctly. The term 'phase' for the purposes of ensuring the 35% affordable housing cap is not exceeded, relates to predefined areas based upon the three neighbourhoods and main land ownerships within them, as referenced to in the Ipswich Garden Suburb Infrastructure Delivery Plan. The Preferred Options CS10 includes the insertion of a map within the supporting text, to identify each of the 'phases' for clarity and easy reference, on how the 35% cap should be applied.
25. The proposed submission does not alter Table 8b of Core Strategy – Strategic and Neighbourhood Infrastructure Requirements for the Ipswich Garden Suburb (formerly Northern Fringe).
26. This policy and the IGS SPD has provided a robust framework for the consideration of planning applications coming forward on the IGS. The amendment to the Policy and supporting text provide an updated policy position and clarification on the expected affordable housing requirement for the development. This policy is supported by Paragraph 72 of the NPPF (2018).

Ipswich Garden Suburb Supplementary Planning Document (SPD) (adopted 22nd March 2017)

27. The SPD provides guidance on how the allocations in the development plan will be delivered both in spatial terms and in terms of sequencing, along with more general supplementary planning and design advice. It is arranged in two parts:
 - Part A: Planning and Design
 - Part B: Implementation and Delivery

Part A: Planning and Design

28. Part A: Planning and Design establishes the Council's vision and objectives, the overall approach to, and principles to guide the detailed master planning and design of the development. This is broken down into four chapters.
 - Vision and Core Objectives for Ipswich Garden Suburb. This chapter makes clear the Council's vision for an 'Ipswich Garden Suburb', and sets these within the national and local policy context. It provides guidance on a suitable approach to sustainable design and development, which is focused around the key themes of Character, Community, Connectivity, and Climate Change.

- Ipswich Garden Suburb Framework Plan. This chapter presents the Development Framework Plan – an overarching site plan which will guide the quantum and disposition of land uses across the site.
- Spatial Strategies. Provides four site-wide spatial strategies to guide the co-ordinated planning of landscape, movement, walkable neighbourhoods and sustainable drainage systems (SuDS).
- Designing and Delivering Garden Suburb Character. The chapter provides design guidance which will guide the creation of a garden suburb character at the Northern Fringe development.

Part B: Implementation and Delivery

29. Part B: Implementation and Delivery, sets out the Council's expectations about how the vision and objectives can be realised in relation to infrastructure, community development, management and the planning application process. In particular:

- Transport Strategy. This chapter explains how the transport strategy should guide future outline applications. The strategy has been prepared by Ipswich Borough Council and Suffolk County Council (the Highways Authority).
- Infrastructure to Support the Growth of a Community, lists what infrastructure will be required to support both the new garden suburb community and the existing surrounding community.
- Community Development. This chapter explains the approach to developing a Community Development Strategy which will centre on creating a place where people choose to live and on promoting community well-being. A key factor will be the funding to support development including the appointment of a Community Development Officer.
- Long Term Management and Maintenance, sets out guidance on the necessary long term management and maintenance of the landscape and green infrastructure within the proposed development. This will be achieved through a Management plan which will be required prior to the development commencing, and will be jointly prepared by Ipswich Borough Council and the landowners.
- Requirements for Future Planning Applications. This chapter explains the Council's likely planning requirements at an outline application stage and beyond to ensure a co-ordinated approach and the delivery of a high quality design.

Ipswich Garden Suburb Development Timeframe

30. The Ipswich Garden Suburb will be planned and delivered over many years, and the proposals will require both outline planning permission and reserved matters applications at different stages.
31. The SPD sets out the information and documents that should be submitted in support of any outline planning application.
32. Design Code approval will either be considered after the outline planning application process has finished, or could be submitted at the same time.

33. Reserved Matters applications would then follow the approval of design briefs for primary streets; schools and local and district centres as part of the Design Codes development.
34. Construction of houses and the associated infrastructure would then follow.
35. It is anticipated that the completion of the whole development could take until at least 2036.

Conclusion

36. The Council in its Core Strategy Review Preferred Options has made minor alterations to Policy CS10 and the supporting text. The detailed infrastructure requirements of the development are set out in Table 8b of Core Strategy review and remain unchanged.
37. The adopted Ipswich Garden Suburb SPD provides comprehensive supplementary planning and design guidance for the master-planning of the Ipswich Garden Suburb, which will support the borough of Ipswich in meeting its objectively assessed housing need and provide the opportunity for future residents to live in a sustainable garden suburb.