

**Gladman Hearing Statement**

Examination of the

Ipswich Local Plan Review 2018-2036

Matter 2: Spatial Strategy



**November 2020**

## MATTER 2: SPATIAL STRATEGY

*Issue: Whether the spatial strategy of the ILPR has been positively prepared, is justified as the most appropriate strategy, effective in terms of cross-boundary strategic priorities and will enable the delivery of sustainable development in accordance with national policy?*

### **Overall spatial distribution of development**

- 14. Does the spatial strategy in the ILPR enable Ipswich to fulfil its strategic role in the growth and sustainable development of the ISPA, with particular reference to the Objectives and Policies ISPA1-4 and CS2 of the CSP?**
- 1.1 Gladman remain concerned that the Plan fails to provide a positive and effective mechanism to ensure the delivery of housing needs in full whilst maintaining a rolling 5 year housing land supply. The focus on urban regeneration continues to have merit as part of an overall strategy, but additional sites will be required to ensure that the sustainable growth in the Ipswich Strategic Planning Area can be achieved in line with Objectives 1 and 2 of the Plan. These objectives highlight the need for a continued commitment to strategic working with other local authorities to ensure a coordinated approach to planning and development; and, the need to deliver the homes that are needed to address local housing needs and provide a decent home for everyone.
- 15. Is Policy CS1 necessary and does it serve a clear purpose or does it duplicate the policies in the NPPF on sustainable development and decision-making? Is the policy consistent with the objectives and presumption in favour of sustainable development set out in paragraphs 8 and 11 of the NPPF?**
- 1.2 As set out in our submission to the Regulation 19 version of the Local Plan, Gladman welcome the direction to confirm that decisions will be made in accordance with the presumption in favour of sustainable development through a local policy. Notwithstanding this, it is agreed that such local policies should not just simply duplicate the NPPF and where included in local plans should provide a localised approach to the application of the presumption, linked to the policies and objectives of the Local Plan.

**16. Is the spatial strategy for the location and nature of development in Ipswich, set out in Policy CS2, justified as the most appropriate strategy for the sustainable development of Ipswich, when considered against the reasonable alternatives? What alternative strategies were considered by the Council in terms of the options for the spatial distribution of development and why were these rejected?**

- 1.3 Gladman agree that a sustainable strategy for the growth of Ipswich will require a combination of brownfield sites and sustainable urban extensions in order to achieve the quantum of housing that is required to meet development needs and support economic growth in Ipswich.
- 1.4 In its current form, the Local Plan identifies a single direction for growth, encompassing the Ipswich Garden Suburb and the proposed housing allocation at the northern end of Humber Doucy Lane. In addition, a large number of brownfield sites have been identified, several of which are constrained, being located in low value areas and in some cases with a long history of non-delivery. Those brownfield sites are significantly relied upon in the early and middle years of the plan period to support the delivery of homes. As a result, the proposed strategy does not enable the maintenance of a five year housing land supply and represents an approach that unnecessarily risks the delivery of housing development against identified needs over the course of the plan period. Such unnecessary delays are not consistent with national policy in circumstances where alternative spatial and demonstrably sustainable approaches exist that can fully support the supply of homes that are required to meet identified housing needs.
- 1.5 The Borough's restricted boundary has led to the Council to identifying a single direction for growth comprising of the Ipswich Garden Suburb and land at the northern end of Humber Doucy Lane. This is being relied upon to deliver a significant number of homes within the Borough, particularly in the later years of the plan period. In order to sustainably deliver against the development needs of the Borough and supply the variety of homes that are needed in a sustainable manner, additional directions for growth beyond the borough boundary are necessary and should be allocated within local plans across the wider area.

**17. Is the reliance on two large scale developments at Ipswich Garden Suburb and Humber Doucy Lane to deliver half of the housing requirement for Ipswich, justified as the most appropriate way of achieving sustainable development, the supply of new homes and the growth of the city? If not, what are the alternatives?**

- 1.6 The reliance on the two large development sites, which in reality form a single direction of growth, is not considered a sustainable approach to meeting the development needs of Ipswich. Whilst Gladman do not object to the proposed allocations, it is our view that additional sites are needed as part of a sustainable solution to meeting the housing needs of the communities in full, particularly in the context of the delays to

housing delivery that are proposed to be built into the Plan's strategy (through the stepped trajectory, the over-reliance on a single direction for growth in the later years of the plan and the pressing need to significantly boost the supply of housing land now given the recent record of delivery and the considerable affordable housing need).

### **Flood Risk**

19. **Does the spatial strategy of the ILPR comply with national policy on planning and flood risk? In particular:**
- d) **Given the number of housing allocations which are located in Flood Risk Zones 2 and 3, does the ILPR meet the requirements of the sequential test, as set out in the NPPF, in avoiding inappropriate development in the areas at highest risk of flooding and steering new development to areas with the lowest risk of flooding?**
- e) **Should sites at less risk of flooding, including those outside the Borough, be preferred for the development of more vulnerable uses, such as housing?**
- f) **If it is not possible for development to be located in zones at lower risk of flooding, either within or outside the Borough, do the policies of the ILPR effectively apply the exception test, as set out in paragraphs 160 and 161 of the NPPF, to ensure that development would be safe for its lifetime and that the wider sustainability benefits would outweigh the flood risks?**
- g) **Are the criteria in Policy DM4 sufficiently comprehensive in identifying the type and design of development, which will be acceptable in areas susceptible to different forms of flooding, including surface water flooding? Will it be evident how a decision maker should react to development proposals within such areas?**
- h) **Is Policy CS18 effective in helping to secure further strategic flood defence infrastructure to support the regeneration of the city and is it evident how a decision maker should apply it to development proposals?**
- 1.7 In allocating sites for development, the Council sets out that it has followed the sequential approach to flood risk and applied the exception test where required to ensure that the benefits of providing development outweigh any flood risk, whilst ensuring that the proposed developments will be safe. The approach to direct development to areas of flood risk (including Zone 3) is in part being evidenced by the limited options available to the Council due to its tightly drawn boundary. However, a

range of alternative growth options are available that would enable the delivery of new homes in locations beyond the borough boundary that are spatially well related to the Town and the services and employment opportunities that the wider ISPA provides. The Council suggests that it has undertaken sequential and exception tests as required by the NPPF, but the Local Plan process is exploring the scope to meet the needs of Ipswich outside of the Town's constrained boundary and therefore the Council should look to identify additional sites outside of its boundary that are more suitable for residential development than those that are at high risk of flooding within its boundary.

**Viability and Deliverability**

- 34. Is there capacity in the local housing market and housebuilding industry to support the scale and rate of housing growth committed and planned, especially at the SUEs?**
- 1.8 Gladman are concerned that there is insufficient evidence to support the assumptions of growth in low value areas at sites that are being relied upon to support the delivery of homes in the early and middle years of the plan period. It is important that choice and competition in the market is supported through a variety of housing allocations that can deliver concurrently. In this regard, the single direction for growth should be supplemented by the allocation of further sites in alternative locations that can support the delivery of homes to meet the needs of Ipswich Borough.