



Ipswich Borough Council Local Plan Review 2018-2036 Examination

Hearing Statement Matter 2

Boyer

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1. INTRODUCTION

- 1.1 This hearing statement has been prepared by Boyer and is submitted on behalf of Ipswich School following the representations made to the Ipswich Local Plan in March 2020.
- 1.2 Ipswich School is actively seeking to engage in the preparation of the Ipswich Local Plan which will guide the development of the Borough up to 2036. Ipswich School is seeking to promote and use their land holdings in a more effective manner to secure the long term future of the school which is a registered charity.
- 1.3 In its 600 year history, Ipswich School has been supported by local benefactors including Richard Felaw who in 1482 gave his house for the education of boys in the town, but unlike many other private schools Ipswich School does not have a major endowment and it therefore has to manage its assets carefully in order to be able to deliver its charitable objectives. As a charity, Ipswich School has a long-term strategy to open up access to the School to any worthy pupil, regardless of their ability to pay. The School see this as a major contribution to education in Suffolk, which helps address social mobility and allows pathways to be opened up to deserving pupils.
- 1.4 Ipswich School has submitted representations to previous stages of Local Plan preparation and is a key partner within the Ipswich Garden Suburb (IGS), through land ownership. Representations relate to the need to secure greater flexibility for the school and its land holdings to ensure that the needs of the school can be met in the long term.
- 1.5 Land at Tuddenham Road is currently allocated for Sport and Open Space provision which is not in the best interests of Ipswich School, due primarily to the cost implications of relocating facilities from the existing site at Notcutts Field (which is within the area designated for IGS).
- 1.6 Reallocating land at Tuddenham Road for residential use will ensure that opportunities for housing development are increased across Ipswich Borough but also provide greater assurance for Ipswich School through a positive and appropriate allocation.
- 1.7 Parcels of land are currently allocated but these do not provide the most appropriate solution for the School and are not considered to be justified and effective allocations as they do not match the aspirations of the land owner as explained in more detail below and within other hearing statements submitted on behalf of Ipswich School.
- 1.8 It remains the view of Ipswich School that the emerging Ipswich Local Plan is not justified and the allocations within it are undeliverable.
- 1.9 This hearing statement relates to Matter 2: Spatial Strategy.

2. MATTER 2: SPATIAL STRATEGY

- 2.1 On behalf of Ipswich School, a number of questions from the Inspectors Matters, Issues and Questions have been addressed below. For ease of reference the question has been provided in bold and italics font with the response below.
- 2.2 This hearing statement focuses on Matter 2: Spatial Strategy but should also be read alongside hearing statements submitted for Matter 3: Housing Provision and Matter 6: Site Allocations.

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?

- 2.3 The Issues and Options for the Ipswich Borough Local Plan Review (2017) document questions at 'B – Where should the growth go?' and sought to elicit views as to whether growth should take place in specific locations in order to deliver specific infrastructure.
- 2.4 The Council have noted that there is a limited amount of delivery options in Ipswich due to the tightly-drawn boundary but all reasonable alternatives were not considered during the preparation of the Local Plan.
- 2.5 The Issues and Options document which was prepared in conjunction with Suffolk Coastal District Council (now East Suffolk Council) sets out a variety of growth options for both authorities. Option 1, 2 and 3 related to potential strategies for Ipswich:
 - Option 1 – higher density urban regeneration, although this was tested through the Preferred Options documents for the Core Strategy and Policies, IP-One Area Action Plan and Site Allocations and Policies document. A number of the proposed sites were subsequently unavailable for the proposed development densities and this situation was later worsened by the 2008 recession which saw high density schemes to be unviable. The emerging 2011 Core Strategy adopted a similar approach but reduced the highest residential development density requirement from at least 110 dph with an average of 165 dph at Preferred Options Stage, to at least 90dph with an average of 110dph in the adopted 2011 Plan. Density of development has since been reduced in the 2017 adopted Local Plan which just refers to a density level of 90dpa, with no average figure. Density levels do not appear to have returned since the recession.

- Option 2 – increased development beyond the development boundary, locating more housing development in East Suffolk and Babergh and Mid Suffolk Districts. Development could also be located within communities around Ipswich or across the more extensive Ipswich Housing Market Area (HMA) through a new settlement.
 - Option 3 – changing the use of existing land in the Borough to housing, including countryside around the Borough or land currently protected as employment uses. Cross-boundary opportunities on the edge of Ipswich may be present to identify larger areas of land for development linked to significant transport infrastructure improvements. However, some of these sites are constrained by their location in the Area of Outstanding Natural Beauty or in proximity to the A14. In terms of employment land, it is predicted that the employment land required is around half of that already allocated. However, occupancy rates have increased at Employment Areas and it is unlikely that changing employment land to residential land will fully accommodate the Objectively Assessed Need for housing, although small employment sites may be used.
- 2.6 The Preferred Options document (November 2018) sets out the preferred direction for the location and nature of development at Policy CS2. This policy sets a preference for development to be centred in the town centre (which includes the Portman Quarter – formerly called Ipswich Village - and the Waterfront), Ipswich Garden Suburb, the northern part of Humber Doucy Lane in the longer term and on the town's district centres.
- 2.7 Policy CS2 of the Core Strategy and Policies Development Plan Document Review (Final Draft) sets out the location and nature of development and directs growth towards, inter-alia:
- a) 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;
 - 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; and
 - c) Working with neighbouring authorities to address housing need and delivery within the Ipswich housing market area;
- 2.8 A sustainable urban extension to north Ipswich (Ipswich Garden Suburb) will be delivered subject to the provision of suitable infrastructure.
- 2.9 The Local Plan states that this strategy for the location of development will maximise the re-use of previously developed land in Ipswich whilst also creating a Garden Suburb. It is also stated that the central urban focus to the location of development also reflects the sequential approach to site selection required by the NPPF.

- 2.10 The reliance on allocations to the north of Humber Doucy Lane is acknowledged by Ipswich Borough Council which states that there are limited land supply opportunities within the Borough boundary, thus IBC needs to consider future development opportunities beyond the boundaries with the neighbouring local authorities. Whilst we support this approach, the Council do not appear to have considered all alternative options. Allocation of land at Tuddenham Road is a more suitable and achievable option for allocation for residential development which will promote sustainable development and would reduce reliance on cross-boundary working.
- 2.11 Land at Tuddenham Road is one of a number of undeveloped assets which form part of Ipswich School's portfolio. The site, whilst allocated for sports use is unlikely to be required in the medium to long term for this identified use, as justified further below. Allocation of land at Tuddenham Road for residential use could however, help to unlock the redevelopment of Notcutts Field (part of the allocation for Ipswich Garden Suburb) and enable that land to make the required contribution to the Garden Suburb as planned.
- 2.12 The sale of Notcutts Field on its own is highly unlikely to raise the funds required to relocate sports facilities on a new site to a modern standard and therefore, based on current expectations is unlikely to come forward for redevelopment. However, as part of a comprehensive master plan approach alongside residential development on land at Tuddenham Road, the sale of Notcutts Field would allow:
- Funding to be secured from both Notcutts Field and Tuddenham Road to deliver the creation of modern sports facilities on an alternative site already within the ownership of Ipswich School on land at Westerfield,
 - The timely release of land at Notcutts Field into the Ipswich Garden Suburb which will ensure that the scheme is developed in its entirety and does not fall significantly short of the number of new residential units planned for.
 - Land at Tuddenham Road to make a positive contribution to housing supply and delivery across Ipswich Borough which would help to address the possibility of shortfall arising from issues on other sites.
 - Surplus receipts (after allowing for the cost of relocating sports facilities) to be applied to the charitable objectives of Ipswich School and addressing the aspiration of improving social mobility amongst deserving but disadvantaged pupils.
- 2.13 Therefore, we do not consider that the spatial strategy is fully justified and would suggest that land at Tuddenham Road is allocated for residential uses instead of sport uses as this designation has not been fully evidenced, nor has the viability of creating such sports facilities been evidenced.

- 2.14 It is considered that the Council has carried forward a considerable number of existing allocations from the 1997 Local Plan. There is very little evidence of progress being made on these sites with limited activity from site promoters. It is apparent that many of the sites have simply been included within the emerging Local Plan on the basis that they are long standing allocations without the specific circumstances of each site being properly re-assessed.
- 2.15 Allocation of the site at Tuddenham Road for residential development, meets the Council objective of meeting housing need within their own authority and also accords with the strategy of identifying sites on the edge of the built up area. Land at Tuddenham Road is adjacent to the Ipswich Garden Suburb and also the allocation at Humber Doucy Lane and therefore would provide further residential opportunities alongside those already proposed by the Borough Council.
- 2.16 The site in the ownership of Ipswich School also has potential to provide opportunities for connectivity (through walking and cycling links) to the Ipswich Garden Suburb and create a sense of place through a comprehensive development. Allocating the site at Tuddenham Road for residential uses would also mitigate against the potential reduction in deliverable numbers which have been indicated by promoters on allocated sites, including IP035 and IP037.
- 2.17 Individual analysis of these allocations is included in our response to Matter 6.

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?

Policy CS10 – Ipswich Garden Community

- 2.18 Policy CS10 allocates the Ipswich Garden Suburb and states that 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 Garden Suburb.
- 2.19 The proposed Ipswich Garden Suburb includes the identification of Ipswich School land at Notcutts Field. The release of this land by the School 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. The viability of relocating sports facilities to an alternative location (in the ownership of Ipswich School) and releasing Notcutts Field for residential use will be improved through the allocation of land at Tuddenham Road for residential uses.
- 2.20 Further, land west of Tuddenham Road is allocated for sport uses. We object to this designation on the basis that neither the need for such use has been fully evidenced, nor has the viability of creating such facilities been established.

- 2.21 Ipswich School has consistently stressed that it 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.
- 2.22 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 at the B1077 (Westerfield Road). 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. This would be an alternative Playing Fields Site. The various sites are shown in Appendix 1 of the representations to the Ipswich Local Plan Review Final Draft, previously submitted by Boyer on behalf of Ipswich School in March 2020.
- 2.23 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. It is therefore the case that 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.
- 2.24 We consider that reliance on land at Notcutts Field and the allocation for playing fields at Tuddenham Road reduces the soundness of the Local Plan, particularly in relation to Paragraphs 16 b) and 35 b) of the NPPF.

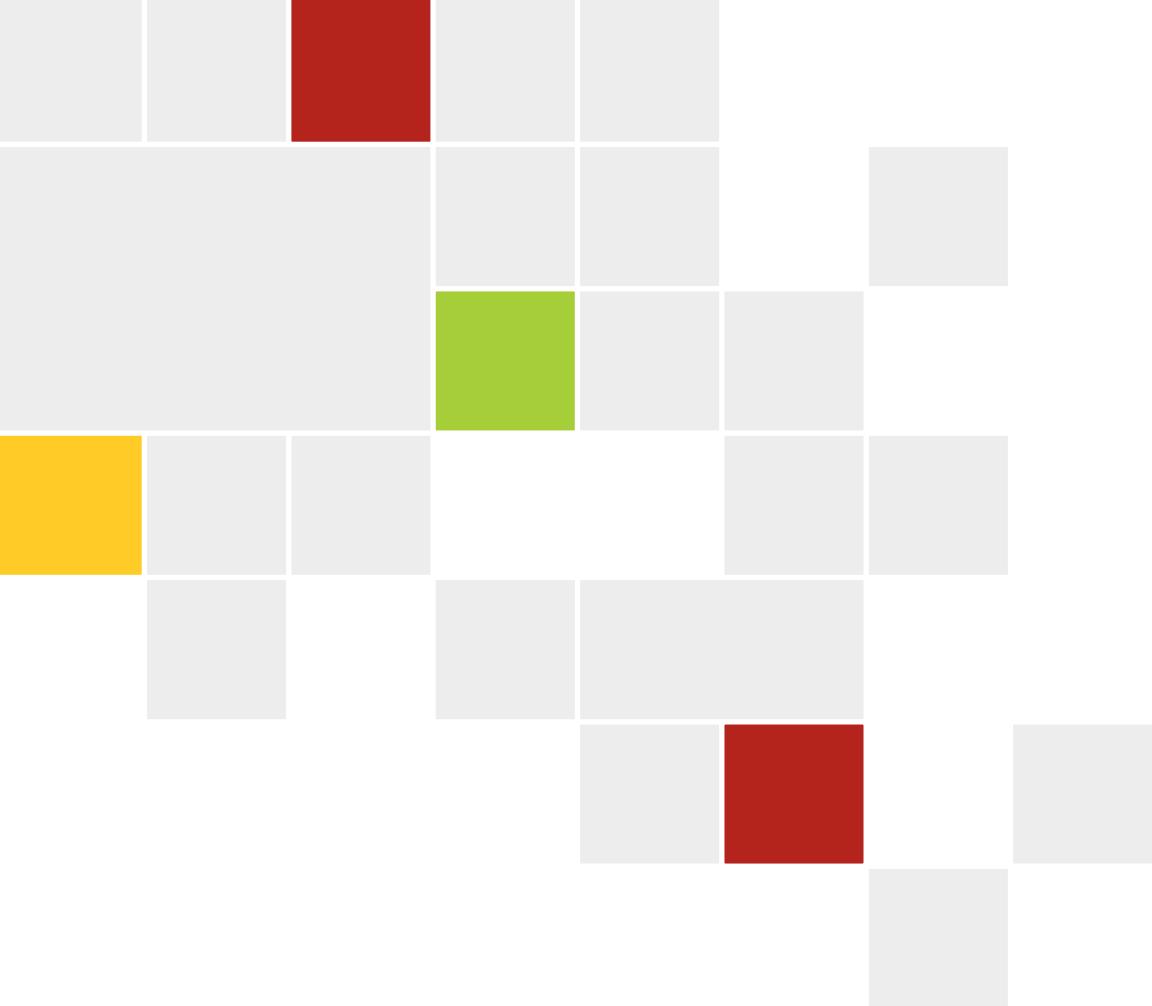
Policy ISPA4: Cross Boundary Working to Deliver Sites (Humber Doucy Lane)

- 2.25 The proposed allocation at Humber Doucy Lane (Policy ISPA4) straddles the border of East Suffolk and would rely on cross-boundary working to deliver the scheme.
- 2.26 We suggest that land off Tuddenham Road, north of Millennium Cemetery (21.81ha, with capacity for up to 500 dwellings) should be allocated for residential development on the basis that the site would be more appropriate and better related to the Ipswich Garden Suburb development through the potential to provide opportunities for connectivity (through walking and cycling links) to the Garden Suburb. This site is 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.

- 2.27 Development of the site at Tuddenham Road would also not involve cross-boundary working given the containment of the site within Ipswich Borough, and would contribute to the soundness of the Local Plan.
- 2.28 Development of the northern end of Humber Doucy Lane would be reliant on IBC master planning jointly with East Suffolk Council. A master planned approach between the Local Planning Authorities could take a number of years, depending on the level of detail and consultation required. 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. Allocation of land at Tuddenham Road would also ensure that the strategic allocations of Ipswich Garden Suburb and land at Humber Doucy Lane can be linked in a more appropriate and plan led manner.
- 2.29 Allocation of the site at Tuddenham Road for residential development would also mitigate against the potential reduction in deliverable numbers which have been indicated by promoters on allocated sites, including IP035 and IP037. Further detail on the specific proposed allocations is set out in our response to Matter 6.

3. CONCLUSION

- 3.1 This hearing statement has been prepared by Boyer and is submitted on behalf of Ipswich School following the representations made to the Ipswich Local Plan in March 2020.
- 3.2 Ipswich School has not attempted to answer every question in relation to this matter, but has instead focussed on those relevant to the representations submitted in March 2020 and the interest of the school as an education provider, charity and landowner.
- 3.3 This hearing statement focuses on the issues identified by the Inspectors under Matter 2: Spatial Strategy. It should also be read in conjunction with other hearing statements submitted on behalf of Ipswich School under Matter 3: Housing Provision and Matter 6: Site Allocations.
- 3.4 Land at Tuddenham Road is currently allocated for Sport and Open Space provision which is not in the best interests of Ipswich School, due primarily to the cost implications of relocating facilities from the existing site at Notcutts Field.
- 3.5 Reallocating land at Tuddenham Road for residential use will ensure that opportunities for housing development are increased across Ipswich Borough, not only from the allocation itself but also through the fact that it potentially enables the release of Notcutts Field and also provides greater assurance for Ipswich School through a positive and appropriate allocation.
- 3.6 As a charity, Ipswich School has a long-term strategy to open up access to the School to any worthy pupil, regardless of their ability to pay. The School sees this as a major contribution to education in Suffolk, which helps address social mobility and allows pathways to be opened up to deserving pupils. Ensuring that land is allocated for the most appropriate uses will ensure the charitable objectives of the School are maintained for the community.
- 3.7 Ipswich School have engaged with the Ipswich Garden Suburb Delivery Board and have been involved with emerging proposals since the emergence of the Steering Group in 2008.
- 3.8 It remains the view of Ipswich School that the emerging Ipswich Local Plan is not justified and the allocation of land for Sport and Open Space at Tuddenham Road is undeliverable. Ipswich School respectfully request that the allocation is revised to residential uses as this meets the Council strategy and is considered to be a site which will deliver housing opportunities over the plan period.
- 3.9 Ipswich School would welcome the continued participation in the preparation of the Ipswich Local Plan to consider any amendments to policy wording and supporting text that relates to the land holdings of the School following the closure of the hearing sessions.



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