

## Suffolk County Council Hearing Statement

### Matter 2 – Spatial Strategy

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**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 Strategy and 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?*

Overall, the county council considers that the objectives and strategic policies enable the Ipswich in its strategic role within the ISPA, notwithstanding the points addressed in question 94c regarding ISPA 4.

#### Flood Risk

*19. Does the spatial strategy of the ILPR comply with national policy on planning and flood risk? In particular:*

*a) Has it been informed by a strategic flood risk assessment (SFRA), based on the most up to date flood risk data and climate change allowances, and taking account of the advice of the Environment Agency?*

From a surface water perspective, the SFRA has addressed the risk of Surface water appropriately.

*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?*

SCC highlighted that in its submission consultation response (representation 26593), that use of the wording “where practicable” in

in relation to the application of SuDS is unsound because paragraph 165 of the NPPF states that “Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.”

Planning practice guidance paragraphs 082 and 083 uses the term “practicable” in reference to deciding the most appropriate type, operation and maintenance of SUDS on a site, not the principle of using SUDS. The guidance makes a distinction between the terms “inappropriate” and “practicable”.

In order to be consistent with national policy the words “where practicable” should be removed.

*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?*

This policy is related to river and tidal flooding, rather than surface water flooding which is SCC’s responsibility. However, SCC considers that this policy has been successful so far in helping to secure major parts of Ipswich flood defence.

### **Transport Capacity**

*20. Is the spatial strategy and location of growth in the ILPR justified and consistent with national policy, in respect of the modelling of its effects on the operation of the highway network and its potential to minimise the need to travel and maximise journeys by sustainable modes of transport?*

The spatial strategy, combined with the ISPA transport strategy to maximise modal shift in both new and existing population, informed by modelling of all the local plans in the ISPA are consistent with national policy. More details on the strategy are in SCC’s answer to question 21.

*21. What evidence is there to demonstrate that the combination of transport measures identified in Policies ISPA2 and CS20 and Tables 8A and 8B of the CSP would be effective in mitigating the traffic impacts of planned growth in Ipswich and that the necessary funding is confirmed to ensure their delivery within the plan period?*

The Transport Strategy for the Ipswich Strategic Planning Area is an agreed strategy to mitigate the impacts of planned growth. It was informed by traffic modelling exercise undertaken using the Suffolk Council Transport Model (SCTM) to assess the potential mitigation of modal shift. This exercise also

identified where the potential for modal shift is greatest and where the relative demand for movement between and within areas is greatest to help inform potential proposals. Alongside the modelling exercise, an analysis was undertaken of the relative success of a range of transport initiatives and their potential for introduction into Ipswich to mitigate the planned growth for the ISPA area. As a result, the ISPA transport mitigation strategy incorporates a range of measures achieve modal shift.

The mitigation strategy is designed for the period to 2036 to coincide with the ISPA local plans, including Ipswich. Delivery of the strategy will be iterative, to reflect the actual rate and location of development and the availability of different funding opportunities during this significant period. The mitigation strategy considers funding sources including contributions from developments (via S.278 and S.106 agreements), CIL, the Local Growth Fund and Highways England. To date the Quality Bus Partnership has been established, assessment of funding mechanisms has been undertaken and a Smarter Choices plan is under development. An ISPA Task Force, with representation from each of the ISPA district councils and the county council, has been established to support the ISPA Board's role in agreeing approaches to implementing the mitigation strategy. Officers from the ISPA councils are working together to examine the potential funding from different sources and to put in place mechanisms to secure this funding.

The success of the Smarter Choices approach has been shown to be effective both nationally and in Ipswich. In 2010 the TravelSmart Individualised Travel Marketing project targeted 17,000 households and achieved increases in walking, cycling and bus use leading to a relative reduction in car-as-driver trips of 11%. The Department for Transport, DfT, Best Practice suggests on average a 15% modal shift can be achieved among employees who work for organisations that implement a Travel Plan. The DfT has also invested in significant sustainable and smarter choices programme to achieve modal shift. The Smarter Choices approach will therefore combine experience in developing and delivering travel planning for new developments, schools and existing businesses and build on work undertaken in Lowestoft and Bury St Edmunds to deliver wider modal shift. The Smarter Choices approach will be agile enabling the effectiveness of the measures to be monitored and adapted to optimise modal shift. There are obvious links with other areas of the ISPA Mitigation Strategy to provide opportunity through improvements to walking, cycling and bus infrastructure and also demand management linked to the IBC parking strategy.

*22. Is Policy CS20 justified and effective in respect of the Key Transport Proposals?*

The County Council strongly supports Policy CS20 and considers that the focus on sustainable modes of transport is justified. As mentioned in SCC's

submission consultation response the Suffolk County Transport Model highlights that growth within and surrounding Ipswich, may cause severe impact on the highway network which cannot be addressed to improvements to the highway alone. The results of the model informed the Transport Mitigation Strategy for the ISPA (D39), which identifies the level of transport mode shift required to mitigate transport impacts of the ISPA local plan and draws upon previous examples of where the measures within the strategy have been successful.

*23. Given the Council's agreement, in the SsoCG with East Suffolk and Babergh and Mid Suffolk Councils, to modify Policy ISPA2 and the supporting text to Policy CS20 to remove reference to the Ipswich Northern Route, is it appropriate for paragraph 8.19 of the supporting text to Policy ISPA2 to continue to support a Northern Route to enable longer term growth within the strategic planning area?*

The Ipswich Northern Route (INR) is currently not being pursued by the county council as an option. A taskforce has been created in order to identify suitable alternatives for transport in Ipswich and the surrounding areas. Regardless, the INR was not necessary to deliver growth in the Ipswich Local Plan review

### **Infrastructure Capacity**

*30. Is the ILPR effective in the provision of infrastructure and local services to meet future development needs? In particular:*

*a) Are the strategic infrastructure priorities and schemes identified in Policy ISPA2, Policy CS17 and Table 8A comprehensive and up to date, sufficient and justified as necessary to support the development needs of the plan, and deliverable over the Plan period?*

The county council are content that ISPA2 and Policy CS17 are comprehensive, up to date, sufficient and justified.

The county council highlighted that there were insufficiencies in Table 8 as part of its submission draft response (representation 26573), and has worked with the Borough Council to rectify this. The draft table in the SoCG (I15) between IBC and SCC, represents a comprehensive, up to date and justified list of infrastructure.

*b) Are there any types of infrastructure or schemes which may be required to support future needs missing?*

If the plan is modified in line with the SCC and IBC SoCG (I15), any missing needs from the county council's perspective will be rectified.

*c) Would the ILPR provide improved infrastructure and services to promote sustainable growth?*

From the county council's perspective, If the plan is modified in line with the SCC and IBC SoCG (I15), yes.

*31. Is the list of strategic and neighbourhood infrastructure requirements for the IGS in Table 8B complete?*

Suffolk County Council worked closely with Ipswich Borough Council in the production of strategic infrastructure requirements, particularly during the production of the Mott Donald Report. The interactions between the permitted applications within Henley Gate and Fonnereau Village were also subject to review and complex negotiation during determination of applications.

Since decision by the Planning and Development Committee on 4 April 2018, infrastructure costs have changed. This is particularly relevant to education contributions with the introduction of guidance from the Department for Education and the use of benchmark costs.

The secondary school is included as a 1,200 place school including a sixth form. The delivery of a sixth form facility at this school will depend on the capacity at other centres and future policy around further education.

District & Local Centres are identified as strategic community facilities with integrated library facilities. Provision within the district centre to meet likely demand from the new community is still the aim of the library service. However, the central Ipswich Library at Northgate Street would also receive increased demand arising from the increased population. Contributions towards improved facilities were previously requested (the then sum of £143,000) and were agreed to be withdrawn as the delivery of services were reconfigured to reduce costs. Ideally, Table 8B should also include strategic library contribution (off-site); this is a similar type of strategic infrastructure contribution as the swimming contribution and the household waste facilities (sum) that are included for each neighbourhood.