

**HEARING STATEMENT
SUBMITTED ON
BEHALF OF MR
NORMAN AGRAN
(REP ID 26319)
RESPONSE TO
INSPECTOR'S
MATTERS, ISSUES AND
QUESTIONS: MATTER 6
SITE ALLOCATIONS –
IP054B**

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111. Are the housing allocations listed in table 1 and referred to in Policy SP2 justified and effective? What evidence is there to demonstrate that they are deliverable and/or developable in accordance with the housing trajectory and the proposed site capacity? In particular, are they confirmed by the landowner involved as being available for the use proposed? 1

139. What is the justification for the allocation of this site for residential uses only as opposed to mixed uses given its location in the town centre? 1

Appendix 1
SITE LOCATION PLAN

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1.0 Introduction

- 1.1 This Hearing Statement has been prepared on behalf of Mr Norman Agran (the “client”) in respect of the Land between Old Cattle Market and Star Lane, Ipswich, which is proposed for allocation under Policy IP054b for residential purposes.
- 1.2 On behalf of our client, Bidwells submitted representations to the Final Draft Site Allocations and Policies DPD Review in February 2020.
- 1.3 Our client’s interest in the proposed IP054b allocation extends to the commercial units identified in red in the plan at Appendix 1 of this Statement. Our client is the owner of these commercial units.

2.0 Responses to the Matters, Issues and Questions

- 2.1 This Statement has been prepared specifically in response to the Inspector’s Matter 6 – Site Allocations, Issue, which asks:

Whether the proposed site allocations in the SAP are justified taking into account the reasonable alternatives, positively prepared in meeting the Borough’s development needs, effective in terms of deliverability over the Plan period and consistent with national policy in enabling sustainable development?

- 2.2 The questions of relevance to our client’s site are referred to with our responses below.

Housing Allocations (Policies SP2 and SP3)

Land allocated for Housing (Policy SP2)

111. Are the housing allocations listed in table 1 and referred to in Policy SP2 justified and effective? What evidence is there to demonstrate that they are deliverable and/or developable in accordance with the housing trajectory and the proposed site capacity? In particular, are they confirmed by the landowner involved as being available for the use proposed?

- 2.3 Our client has not confirmed as part of the emerging Local Plan process that site IP054 is being made available solely for residential use.

Site Specific Issues

IP054b – Land between Old Cattle Market and Star Lane

139. What is the justification for the allocation of this site for residential uses only as opposed to mixed uses given its location in the town centre?

2.4 We consider that insufficient justification has been given for the allocation of residential uses of this site only, as opposed to mixed uses.

2.5 The Council's evidence base does not appear to support a restriction on the proposed use to residential only:

- The site is assessed in the **Ipswich Economic Area Employment Land Supply Assessment** (Lichfields, April 2018) (document reference D1). An extract from the site assessment is at Appendix 2 of this Hearing Statement. The site is identified as being in "B1c light industrial uses which is considered suitable for the site and location, as well as other B1 uses". The concluding text to the site assessment identifies that "suitable uses are assessed to be either offices (B1a) or light industrial (B1c)."

Additionally, the site scores well in the site assessment as an existing employment site, with a score of 20 points. The highest site achieves 25 points and the lowest scores 13 points.

- The site is included in the **Strategic Housing and Economic Land Availability Assessment** (SHELAA, January 2020) (document reference D13). An extract from the site assessment is at Appendix 3 of this Hearing Statement. Under "proposed land use" it identifies "residential or residential-led mixed use". In the "site conclusion – employment" section, it identifies the site as being "suitable for some employment B1, leisure but residential is the preferred use." Again, employment is deemed suitable and it is not clear from the site assessment who proposes residential as the preferred use, as we have not been able to identify any further evidence that confirms this.

2.6 From the above it is clear that the proposed restriction to residential use in the Final Draft version of the Plan runs contrary to the evidence in support of the Plan. The Plan is therefore not justified taking into account the reasonable alternatives, namely a flexible allocation that includes employment. This would accord with paragraphs 11, 80 and 83 of the National Planning Policy Framework, which require plans to be sufficiently flexible to adapt to rapid change.

2.7 In light of this, there is no sound justification as to why the flexibility previously afforded to the site through the adopted Local Plan should be taken away. This is particularly acute in light of the conclusions of the Topic Paper: Economy – Including Post Submission (Regulation 22) Addendum August 2020 (document reference I5), which concludes at paragraph 105 that:

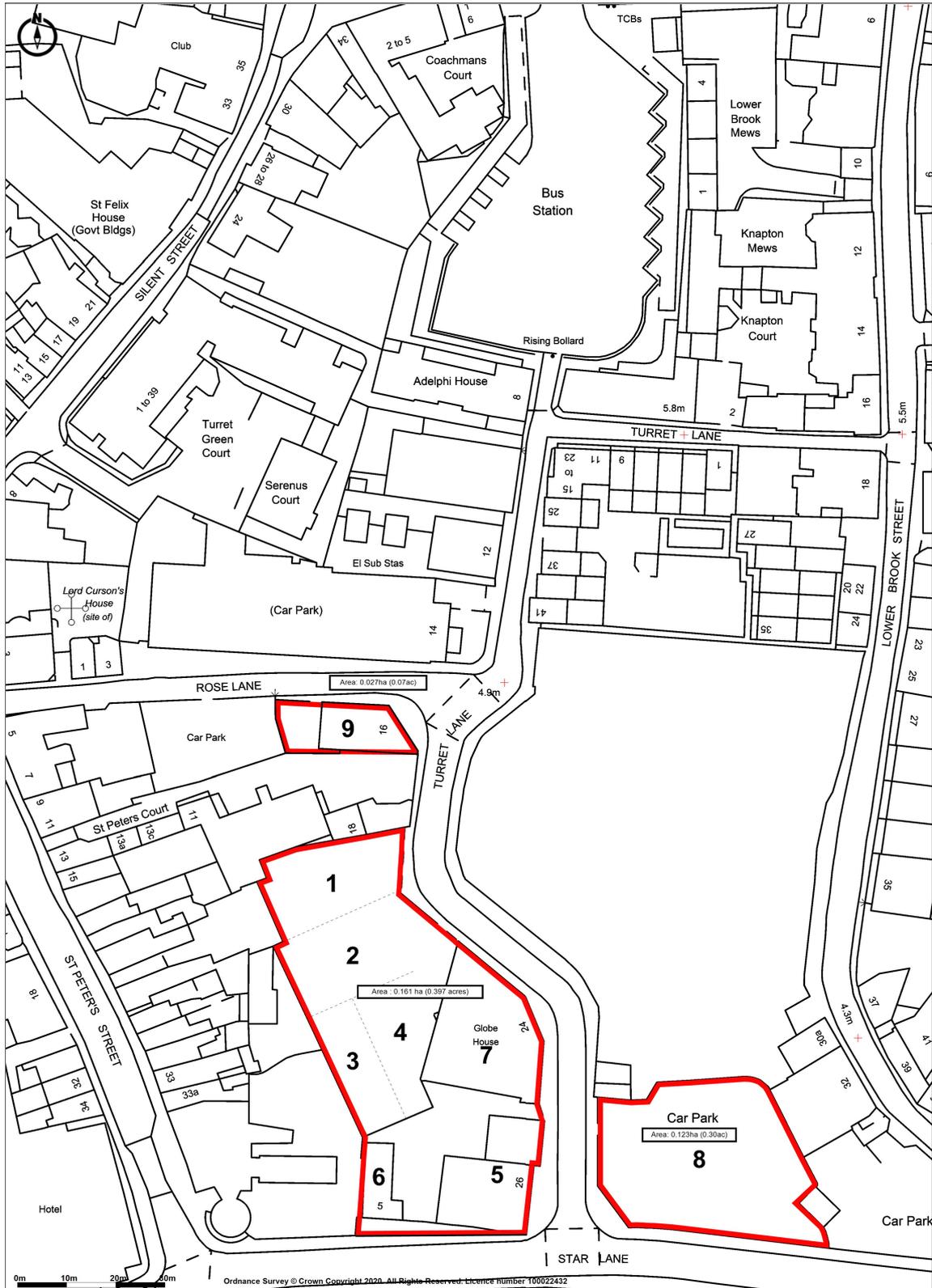
Clearly the impact of COVID-19 is an unknown quantity at this time. Research on the subject is clear that it is impossible to predict the impact of COVID-19 on the economy until at least the end of the year and into 2021.

2.8 Notwithstanding the apparent inconsistencies between the evidence and the Plan as noted above, now is not the right time to place a restriction on the site, bearing in mind that the Plan intends to provide the policy framework for the Borough up until the year 2036.

2.9 Additionally, there are other site allocations within the IP-One area that are designated for a mix of uses, including residential and employment. It is unclear why our client's site within the IP054 allocation is not afforded the same flexibility.

APPENDIX 1
SITE LOCATION PLAN

Norman Agran - Ipswich Properties



APPENDIX 2
EMPLOYMENT LAND SUPPLY
ASSESSMENT EXTRACT (DOC REF. D1)

Site Assessment Report

		Site Reference	IP054
Site Location	Land between Old Cattle Market & Star Lane		
Employment Area	Not within an Employment Area		
District	Ipswich		
Site Area (ha)	1.152		
Greenfield/Brownfield	Brownfield		
Site History	Part of the site has planning permission for residential development (East of Turret Lane).		
Existing Land Use	Light industrial (B1c) and car parking		
Neighbouring Use	Light industrial, residential	<p>Assessed Suitable Use</p> <p>Site is in B1c (light industrial) use which is considered suitable for the site and location, as well as other B1 uses.</p>	
Proposed Use (allocated)	Allocated for 70% employment (office) as part of a mixed use scheme including leisure with residential and small scale retail (SP5)		

Site Assessment Criteria (scored out of five)

Strategic Road Access to Site	2	The site is on an A road. It is located 3.7km to the A14.
Local Accessibility to Site	4	The site has multiple access points, including from St Peter's Street. The site is 0.8km to the train station and is close to a number of bus stops.
Proximity to Urban Areas and Access to Labour and Services	4	The site has good access to a range of town centre services and facilities, as well as residential areas which provide labour supply.
Site characteristics and development constraints	2	Circa 50% of the site is within flood zone 2. This is an urban site, therefore any development is unlikely to have an impact in landscape terms.
Compatibility with neighbouring/ adjoining uses	4	The site is near to light industrial and retail uses, as well as some small residential areas.
Market Attractiveness	4	All units at the site are occupied.
Total Score	20	~

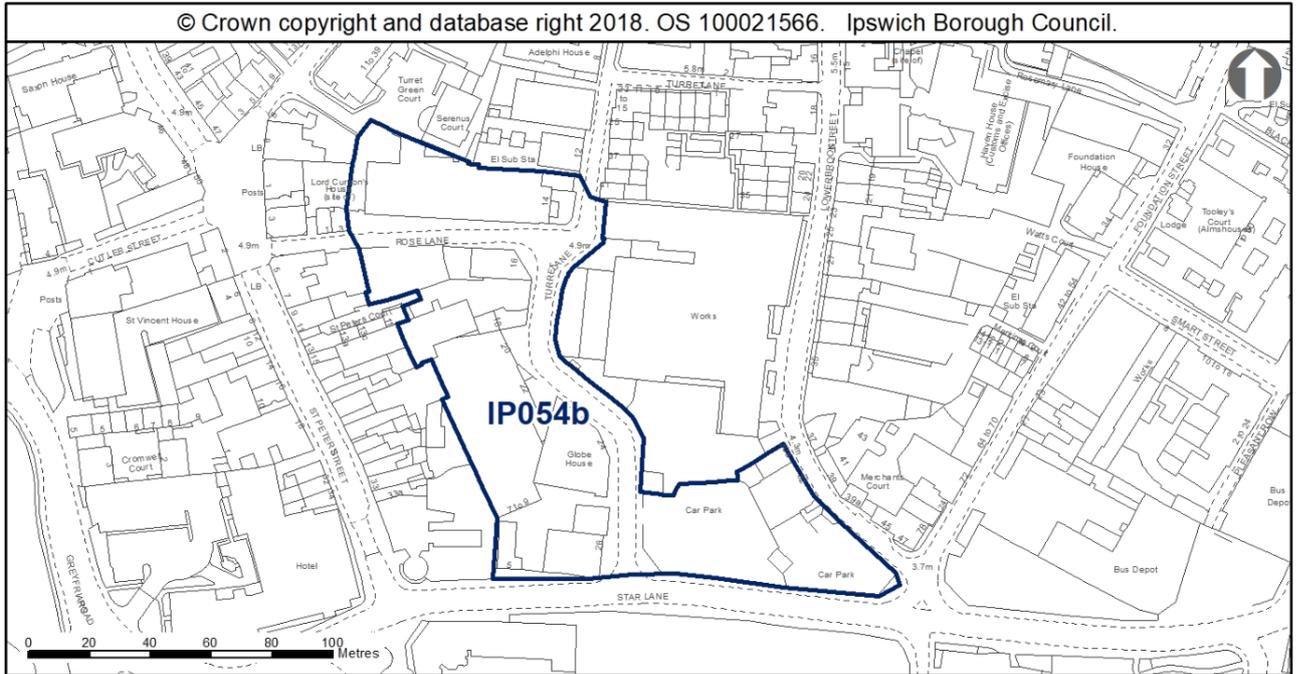
Planning Factors and Barriers to Delivery

Environmental Factors	Yes	No absolute constraints to development. Circa 50% of the site is within flood zone 2, though there is potential to mitigate its impact.
Historic Environment Factors	Yes	There is archaeological potential on site. However, this is an existing employment site and the area of interest are in locations already developed for employment uses. The site contains a Grade II listed building, a Scheduled Monument and is within the Central Conservation Area.
Other Planning Policy Factors	N/A	The site is within an Air Quality Management Area.
Barriers to Delivery	Yes	Site contains industrial units which may require demolition.

Site Conclusion Text	The site is considered suitable for B1 use employment, therefore the existing light industrial use of the site is suitable. The site has relatively poor strategic road access, but benefits from good local accessibility and access to labour and services. Suitable uses are assessed to be either offices (B1a) or light industrial (B1c).
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APPENDIX 3

SHELAA EXTRACT (DOC REF. D13)



District:	Ipswich Borough Council		
Site Reference:	IP054b		
Site Location:	Land between Old Cattle Market and Star Lane		
Approx site area (ha):	0.95	Brownfield / greenfield / mixed use land:	Brownfield
Existing land use:	Mixed uses – temporary car park, small scale employment		
Neighbouring land use:	Residential, employment, retail		

CONSTRAINTS		IMPACTS	
Access to site	Amber	Landscape/townscape	Amber
Access to wider transport networks	Amber	Biodiversity and geodiversity	Green
Access to local services & facilities	Green	Historic environment	Amber
Utilities capacity	Amber	Open space	Green
Utilities infrastructure	Amber	Transport and roads	Amber
Contamination	Green	Compatibility with neighbouring uses	Green
Flood risk	Amber		
Market attractiveness	Amber		

Proposed land use description:	Residential or residential-led mixed use
SHELAA site assessment	
Suitability	Yes, subject to relocating or re-accommodating some existing employment uses, and archaeological considerations
Availability	Site may be available
Achievability	Site may be achievable mid-long term – former Archant works adjacent is currently under construction for residential. At an indicative capacity of 60dph, the development of this site is likely to

	be housing-led which the Whole Plan Viability Assessment has demonstrated to be generally viable.
Site conclusion - Housing:	Suitable for housing use, subject to relocating or re-accommodating some existing employment uses, and archaeological considerations. Site is near AQMA. 2017 adopted Local Plan allocation for office or leisure led mixed use (28 dwellings at 55dph on 30% of site). Former Archant site to the east now under construction for residential indicates stronger residential market here than office. Indicative capacity of 60% of site used for residential at 60dph is 40 dwellings.
Estimated dwellings yield:	40
Estimated delivery timetable:	11 – 15 years
Site conclusion - Employment:	Suitable for some employment B1, leisure but residential is the preferred use.



BIDWELLS