

Matter 6: Site Allocations

Strategic Allocations

Ipswich Garden Suburb (IGS) (Policy CS10)

Representations 26493, 26496, 26507, 26509, 26534, 26506, 26522, 26494, 26523, 26532, 26533, 26536, 26495, 26538

78. What evidence is there to support the deliverability and developability of the IGS during the Plan period?

We believe that the IGS can be delivered, provided the IGS SPD is adhered to and the appropriate infrastructure is delivered in a timely manner. A robust IGS Delivery Infrastructure Plan is required to ensure this. It is not clear whether the Ipswich Garden Suburb: Infrastructure Delivery Plan 20 January 2017 (D47) is the most recent version or whether it is being updated as a living document. It is important that Developers submit detailed planning applications that are compliant with the IGS SPD, outline planning conditions and flood risk requirements. We note that IBC has been successfully delivering new homes in Ipswich in a timely and efficient manner and we see no reason why the IGS (and other) Developers cannot do likewise. We believe the identification and specification of IGS-wide foulwater infrastructure would help deliverability. Our main concerns with the IGS relate to off-site issues in relation to traffic/congestion, modal shift, air quality and flood risk/drainage.

79. What evidence is there to show that the infrastructure requirements listed in Table 8B for the IGS are justified, deliverable and consistent with national policy?

IBC has invested in a considerable amount of work over many years through the IGS masterplan and SPD, viability testing etc to ensure this is the case. IBC should be given credit for this. Whilst we have some issues of the lack of detail in Table 8B (please see our response to Matter 2), which can be resolved, we currently believe the infrastructure requirements are justified and deliverable over time. However, it is not clear when such infrastructure will be delivered. More detail on the required infrastructure and the inclusion of intended delivery dates would help make the Plan sound.

81. As the proposed development of the IGS is required to contribute towards the Recreational Avoidance and Mitigation Strategy (RAMS), in addition to the provision of the Country Park and other on-site open space, how would this be secured and should reference to it be included in Policy CS10 and Table 8B?

We agree that this additional contribution is required and that an agreed approach to secure this is required for the Plan to be sound. For completeness, this requirement should also be referenced in Policy CS10 and Table 8B.

87. Has the potential impact of Sizewell C been considered in respect of rail freight transport passing through the site on the Ipswich to Westerfield line?)

No. We also note that the impact of increased freight from Felixstowe docks by 50% and the 30% planned increase in train numbers has not been adequately assessed. This affects air quality modelling across Ipswich (especially as this line is not electrified), noise assessments for the IGS and the traffic modelling around the IGS as we believe it considerably underestimates the length of time that Westerfield Crossing will be closed (for passing rail freight) and the effects of this on road congestion in the area. Increased emissions from idling diesel engines of the higher number of trains will be detrimental to air quality in Ipswich and has not been examined. The Plan is unsound in this respect and the modelling needs to be re-run to include the effects of Sizewell and increased

Felixstowe freight on air quality and traffic in Ipswich, and noise on the IGS, to demonstrate that the Plan is sound.

88. Has sufficient provision been made within the IGS for community outdoor sport provision, in particular playing fields?

No. We do not believe that there is sufficient provision as access to shared outdoor sport provision, located at schools, by the wider community will be heavily restricted due to Safeguarding requirements. We have little confidence that adequate agreements with schools/academy trusts can be reached to ensure access by the community to outdoor sports facilities in perpetuity. This needs to be addressed in the Plan for it to be sound. We also note that the existing hockey pitch off Henley Rd will also be lost to homes, although it should be replaced by one on Tuddenham Rd.

89. Has sufficient consideration been given to the impact of the IGS on air quality, flood risk, drainage, the existing road network, sewerage infrastructure and biodiversity?

No. There has been insufficient consideration of the impacts of rail freight on the IGS in relation to air quality, noise, and traffic congestion from increased closing of Westerfield rail crossing for freight trains.

There has been insufficient consideration given to the delivery dates of key traffic-related projects required to deliver the IGS. Table 8B should include the required implementation dates for off-site junction improvements and new modal shift infrastructure sound (as for the infrastructure projects identified in Table 8A). This is important as these delivery dates need to be consistent with the delivery dates assumed in the traffic/air quality modelling for 2026 for the Plan to be sound (i.e. assumptions of 15% modal shift achieved and IGS junction improvements to be in place by 2026).

The outline planning Conditions for the Henley Gate and Fonnereau developments specified by IBC in the Decision Notices have identified trigger points for junction/road improvements which when cross-referenced with the planned phasing of the Ipswich Garden Suburb (Topic Paper reference 16) show when road infrastructure is actually planned to be delivered.

Trigger Point	Road infrastructure improvements etc	Indicative date from I6 build schedule
Henley Gate		
299 homes	Henley Rd and Dale Hall Rd junctions with Valley Rd	2025/26
600 homes	Westerfield Rd/Valley Rd junction	2027/28
699 homes	IGS Road Bridge	2028/29
Fonnereau		
399 homes	Westerfield Rd/Valley Rd junction	2028
499 homes	Tuddenham Rd/Valley Rd junction	2030

This shows that currently there is a major disconnect between the delivery dates assumed in the modelling and those specified in Planning applications, which is clearly unsound. IBC also needs to confirm that the £9.8m from the Housing Infrastructure Fund will still be available for the road bridge when it is scheduled to be constructed in 2028/29. Similarly, other modal shift projects/infrastructure funded by IGS Developers, through planning Conditions, will not have been delivered by 2026 e.g. the Smarter Choices Programme for homes between Norwich Road and Henley Road, which is required to commence with the 500th home (forecast in I6 as 2027/28); clearly too late to deliver the 15% modal shift required by 2026. The third trigger point for off-site

sustainable travel measures for both Henley Gate and Fonnereau is also post 2026 so these will not be delivered in time. The Plan can be made sound by either

- a) re-running the traffic and air quality modelling with agreed infrastructure/modal shift delivery dates (rather than assuming they will be delivered in 2026) to demonstrate soundness, or
- b) by IBC securing funding for these road infrastructure and modal shift projects for them to be fully operational by 2026.

Policy CS10 references the “Ipswich Garden Suburb Infrastructure Delivery Plan” but this does not appear to have been updated since 2017 and is therefore obsolete. Given the progress outlined in I6, we would now expect to see some form of updated Infrastructure Delivery Plan. This needs to be provided and examined before the Plan can be found to be sound to ensure it is consistent with the traffic and air quality modelling assumptions.

We note that the traffic modelling excludes construction and trades traffic arising from the new development in the Plan, so will considerably under-estimate the impacts on air quality and existing infrastructure during the long buildout period. When assessing the infrastructure needs and identifying specific infrastructure requirements, the traffic modelling needs to model traffic associated with the construction of all development proposed in the Plan for it to be sound.

There has been insufficient consideration given to identifying the required IGS foulwater infrastructure, including the offline storage required to prevent flooding arising from foulwater infrastructure. “Any strategic improvements to sewerage system” is too much of a catch-all and should identify the specific key requirements for the Plan to be sound. For example, from the Henley Gate Phase1 planning application we know that two pumping stations will be required¹ and, from previous discussions, that some form of foulwater offline storage capacity will be required either on the IGS site and/or added to the existing network in more than one location. Further details of the type of foulwater infrastructure that will be required, by when and where is required to be included in the Infrastructure Tables to ensure that it can be delivered in a timely manner for the Plan to be sound. We would expect this to be available in the IGS Infrastructure Delivery Plan for it to be robust. We note that the submitted Infrastructure Delivery Plan (I6) is misleading in stating that “No major utilities infrastructure is identified” as we know that it will be required but just not the specific details of when/where etc.

Humber Doucy Lane (Policy ISPA4.1)

Representations 26512, 26516, 26514

91. Is the allocation of this site on green field land on the edge of the settlement justified? Did the SA consider reasonable alternatives to this allocation, such as more homes in the town centre or on other sites within the urban area?

No. We believe there has not been sufficient consideration of the potential for more homes in the town centre as IBC has over-estimated retail space and car parking requirements and the SA/Plan is unsound in this respect. Providing new homes on brownfield land is clearly more sustainable than building on green field land. This will also help regenerate the town centre and could help link the Waterfront with the main town centre. Building town centre homes will reduce the need to travel by car, help mitigate congestion and will be less damaging to air quality and the environment. Retaining

¹ We also note that the detailed planning application for Phase1 of Henley Gate omitted any design details for the two required pumping stations, which is clearly a major oversight.

green field land, will help preserve biodiversity and the associated benefits. Building town centre homes, rather than at Humber Doucy Lane, will remove the reliance of IGS infrastructure and the need for new road development to deliver the site. The SA has failed to consider this reasonable alternative and is not sufficiently robust in this respect.

92. What evidence is there to demonstrate that the site will be delivered in full within the Plan period, given that it relies on the delivery of infrastructure within the Ipswich Garden Suburb site? What is the justification for this phasing? Should the Plan include a trigger point following which development on this site should begin to ensure its delivery within the Plan period?

There is no evidence this site can be delivered within the Plan period, but it is correct in assuming that delivery would be reliant on IGS infrastructure. We question whether any of the site is required in the Plan period, never mind the full site.

95. The supporting text at paragraph 8.28 states that the transport mitigation measures required for this development are challenging. The Council now proposes to remove the word 'challenging' from the supporting text. However, what evidence is there to support the deliverability of these transport mitigation measures? (Maybe impossible due to land ownership constraints not taken into account)
IP367 Land west of Humber Doucy Lane Housing 7 0.33 11-15 (SSfB)

No evidence has been provided that the modal shift targets required to deliver the Plan can be provided; it is unsound in this respect. We agree the location of the site means that transport mitigation measures are "challenging" and note that IBC has not provided any evidence that robust measures can be delivered to overcome these challenges. We do not believe that either of the small, narrow road bridges on Tuddenham Rd can cope with additional road traffic, especially the blind spots on the humpback bridge nearest the cemetery, nor can the junctions of Humber Doucy Lane with Tuddenham Rd and Rushmere Rd. The impacts on Humber Doucy Lane itself, Rushmere Street and the back roads are likely to be great. We suspect that major road improvements will be required all around the site, which are likely to have severe impact on existing residents. It is difficult to see how this site could comply with Policy DM21.

97. Would the development of this site maintain the separation between Ipswich and surrounding settlements? Should this be a requirement of Policy ISPA4, as suggested by the proposed change agreed in the SoCG [A25] with East Suffolk Council, to ensure consistency with Policy DM11?

No, it is therefore unsound in this respect.

Yes, we agree that this should be a requirement of Policy ISPA4 as requested by East Suffolk Council.

102. Would the development of this site provide any net biodiversity gains or green infrastructure as required by Policies DM8, DM10 and DM11?

No. IBC has not provided any evidence of any net biodiversity gains or improved green infrastructure. It is frankly absurd to think that this number of new homes would result in biodiversity improvement given the small amount of remaining green field land of this type in the Borough.

103. Has full consideration been given to the impact of the development of this site on the agricultural land, ecology, air quality, the existing road network, traffic, local services and facilities, flood risk and drainage infrastructure?

No. We do not believe the traffic modelling and air quality assessments include the full build out of this site. We do not believe there has been any form of safety assessment for the bridges and junctions on Tuddenham Road. We are not aware of any flood risk/drainage infrastructure assessment. IBC has not provided sufficient evidence that the impacts of developing this site can be mitigated sufficiently to comply with other Plan policies for its inclusion in the Plan to be sound. There has been no assessment of the costs of complying with relevant Plan policies and whether these costs are low enough for the site to be viable.