



# NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

## Ipswich Draft Local Plan Examination Statement On STAGE 2 - MATTERS AND QUESTIONS

This document refers to first part of Stage 2 concerning Matters 4a, 4b, 6, 7, 8, 10 & 11. A further written statement will be submitted in response to Matters 5 and 9 by 24<sup>th</sup> June 2016 as requested by the Government Inspector.

### Matter 4a – Residential and Sustainable Development policies and General Development Principles

**Q4.1** *Are the policies for residential and sustainable development and general development principles soundly based? If you contend that they are not how should they be modified?*

**Unsound.**

#### CS12 Affordable Housing

**Unsound.**

CS12 refers to affordable housing and is unsound since the levels set for the Ipswich Garden Suburb (IGS) are unrealistic. CS12 paragraph 8.121 states '*This will be achieved by requiring new development at the Ipswich Garden Suburb to provide for at least 35% on-site affordable housing by total floor space.*' However, Para 4.2 of the IBC response (LPCD27) to the Ipswich Viability Report produced by Peter Brett & Associates in December 2014(LPCD26) states '*The indicative scheme average equated to 31.6% affordable housing provision by number and 28.4% by floor space, alongside the full provision of infrastructure*'. Clearly it is unsound to set a target of 35% when the viability report indicates 28%.

We understand that the IGS infrastructure costs were developed mainly in the summer of 2013. Over the past year, IBC and the IGS developers have worked with Mott MacDonald (a consultancy company) to investigate the IGS infrastructure viability, phasing and costs. We understand that the studies indicate infrastructure costs have risen, particularly school costs and network rail costs. We have asked the Inspector to request a statement from IBC on the latest position on IGS infrastructure cost so that a more realistic target on affordable housing can be obtained.

**To make CS12 sound, the affordable housing targets for the IGS should be revised using the latest evidence on infrastructure viability taking into account the Peter Brett & Associates Viability report (LPCD26) and feedback from both IBC and the developers engaged in the Mott MacDonald Study.**

#### DM3 Provision of Private Outdoor Amenity Space in New and Existing Developments

**Unsound.**

In the proposed draft CS Policy DM3 there has been a subtle revision from that in DM3 of the adopted CS (page 81 LPCD11). The change affects all houses, bungalows and ground floor

maisonettes. Depending upon the size of the property, the adopted Core Strategy specifies a minimum 'rear garden space' whereas the revised CS specifies a minimum 'private garden space'. In both cases the minimum space is quite small at 75sq m for 3 or more bedroom properties and 50 sq m for 1 & 2 bedroom properties. The current minimum garden space does not include front and side gardens whereas such spaces can be included under the proposed change. Furthermore we have recently seen outline plans for an Ipswich development in a designated low density development area, that have back gardens significantly less than the above for 4 bedroom link-detached properties, have parking space in the rear gardens and have attempted to offset the lack of rear garden space with garden space on top of the attached car ports. We note that DM3 paragraph 9.25 does not recommend this solution for low rise developments but it is important to have a strong policy to avoid any doubt and set undesirable precedents.

The revised Policy DM3 will have the effect of cramming properties closer together and resulting in much smaller back gardens or in some cases no back gardens at all for both new and infill developments. There is a major risk that much of the minimum space requirements might not be usable outdoor space and therefore of no real amenity to residents. This is a retrograde step out of keeping with attractiveness of the town as well as reducing the safe garden amenity for families and their pets. Also the proposed change to DM3 is contrary to the stated aspirations of high quality design and a sustainable residential environment.

**To improve the CS we suggest the original wording of DM3 as contained within the adopted CS for minimum garden space is retained.**

### **CS2 Location and Nature of Development & CS9 Previously Developed Land**

**Unsound.**

We support the strategy of urban renaissance in central Ipswich (Policy CS2) and note from the first bullet point in Para 8.28 'It will maximise opportunities to re-use previously developed land within central Ipswich.' However we suggest that the proposed removal of a PDL target from CS9 (as currently contained within the adopted Local Plan LPCD11) is a negative step.

We note from Q6.3 below, relating to Employment Space, that there is currently a margin of over 150% for allocated employment land over the identified requirement of 23.5ha. Much of the allocated employment land is on PDL sites, particularly in central Ipswich. Apart from the missed opportunity of sites remaining undeveloped through excess capacity, there is the issue of unregenerated brown field sites remaining a blot on the landscape making Ipswich a less attractive and vibrant town. Without a PDL target for employment land we are concerned that the focus will be on green field development in preference to brown field development.

Similarly the proposed multi-site development of the Ipswich Garden Suburb on green field land raises concerns that this will have a detrimental impact on the regeneration of brown field sites particularly in the town centre and deprived areas. The Government has recognised this general trend happening across the country.

**For improved effectiveness and soundness we recommend a realistic but challenging target be retained for the use of previously developed land to support urban regeneration.**

### **SP1 The Protection of Allocated Sites**

**Unsound.**

This policy does not appear to provide sufficient flexibility in the use of land as required by paragraph 157 of the National Planning Policy Framework '*local plans should ...allocate sites to promote development and flexible use of land*'. Whilst it would seem desirable that sites should be safeguarded for the use(s) for which they have been allocated the plan needs to be able to adapt to change and IBC able to grasp new opportunities that bring benefit to the town. Whilst it seems reasonable that '*The Council will only permit alternative uses on*

*allocated sites if they are compatible with other plan objectives & they do not harm the plan strategy', the following constraints appear too rigid " and the applicant can demonstrate that the allocated use is: a. No longer needed to meet planned development needs; and b. Not viable or deliverable for the allocated use and likely to remain so during the plan period."* This policy doesn't provide IBC with sufficient flexibility to revisit an allocation if it so chooses due to changing circumstances.

As an example, in the Local Plan IP40 & IP41 (Civic Drive) has been allocated for A1 retail. This is somewhat contentious since it doesn't align with the Vision for Ipswich signed off in July 2015 by a non-statutory group focussed on 'turning the town around' and comprising IBC, Ipswich Central, NALEP, SCC, UCS, Ipswich Chamber of Commerce and the Ipswich MP Ben Gummer<sup>1</sup>. The latter envisions a new North South Axis linking the Town centre to the waterfront and '*consigning the East – West axis to history*'. Should IBC later decide to align their view on the allocation of IP40 & IP41 with ICD79, unless the site owner changes their mind the original allocation will remain. As a consequence the site is likely to be left in limbo for some considerable time and SP1 doesn't offer the flexibility to grasp non-retail opportunities should they arise.

**For improved flexibility we recommend deleting from SP1 " and the applicant can demonstrate that the allocated use is: a. No longer needed to meet planned development needs; and b. Not viable or deliverable for the allocated use and likely to remain so during the plan period."**

#### **Matter 4b – Residential Development Applications**

**Q4.2** *Are the site allocations for residential development soundly-based? Are there other non-allocated sites, which could appropriately contribute to housing needs during the plan period?*

**Unsound.**

#### **SP2 Land Allocated for Housing**

**Unsound.**

With regard to the first question, we contend that it is unsound to allocate land for the development of the **entire** Ipswich Garden Suburb (the Ipswich Northern Fringe) (paragraph 4.7 refers) when its delivery may not be viable over the plan timescales. The major issues are the severe adverse impact upon traffic, impact on air quality and lack of sewage pipeline infrastructure. For completeness they are mentioned here but will be dealt with in detail under Matters 5 & 9 in a later representation.

#### **Matter 5 – Ipswich Garden Suburb**

**Subject to a later representation.**

#### **Matter 6 – Employment Policies and Allocations**

**Q6.1** *In the light of the need for 23.5ha(net) of employment land in Ipswich(...) is the provision of Policy CS13 that at least 30ha of land in addition to 10ha at Futura Park will be allocated for B1, B2 and B8 uses soundly based?*

**Unsound.**

The 23.5ha is based upon PSCD10 derived from the EEFM Autumn 2014 (ICD13a) baseline forecasts for B1, B2 and B8 jobs growth and employment space over the period 2011-2031.

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<sup>1</sup> ICD79 Turning Our Town Around – Advancing the Vision to create East Anglia's Waterfront Town

The expected B1, B2 and B8 jobs growth for Ipswich over the period is 4,020 jobs (see Table 7.4 PSCD10<sup>2</sup>) equating to 96,955 sq m of Office Space (B1a & B1b) and 36,155 sq m of industrial and warehousing space (B1c, B2 & B8) (see Table 7.8 PSCD10). The assumption that 50% of the new office space will be in central Ipswich and 50% elsewhere (Paragraph 7.44 PSCD10) appears reasonable although there are viability question marks over the speculative development of new office space in Ipswich (LPCD26 states they are unviable). Plot factors of 0.4 and 2 respectively have been assumed in PSCD10 giving a net requirement of 2.4ha for office land in central Ipswich and 12.1ha for office land elsewhere. In addition a plot factor of 2 has been assumed for industrial and warehouse space giving a land requirement of 9ha (which we assume will not be in central Ipswich due to the higher plot factor used and the higher cost of land in central Ipswich).

The net employment space allows for normal market occupancy rates. In addition to the 23.5ha it would seem prudent to allow a margin for uncertainty, however the total provision of 40ha (i.e. a 70% margin) in policy CS13 appears excessive, particularly as there is insufficient land allocated to meet the objectively assessed housing need. The provision of such a large margin will undoubtedly result in many allocated employment sites, particularly brown field sites, remaining undeveloped over the plan period. What will happen to these sites? Are they simply expected to remain vacant? Failure to regenerate town centre sites will have a negative impact on the attractiveness and vitality of the town, contrary to the CS Vision.

**To improve the soundness and effectiveness, we recommend IBC reassess what would be a more appropriate margin and revise the B1, B2 & B8 employment land provision. We think that in view of the very ambitious jobs growth target for Ipswich compared with historic trends a margin of 10-15% would seem more than appropriate which is more in alignment with the margins assumed for residential land in the CS (10%).**

**Q6.2** *Are the site allocations in connection with employment development soundly-based? If you contend that they are not how should they be modified?*

**No comment.**

**Q6.3** *The plans allocate sites totalling 59ha for new employment development. Is this soundly-based in the light of the identified requirement of 23.5ha(net) of employment land and policy CS13's provision that at least 30ha of employment land (plus 10ha at Futura Park) will be allocated. Is there potential for some of the allocated employment sites to be allocated to alternative uses?*

**Unsound. We believe that there may be some potential to reallocate employment sites or to change the mix of uses.**

A 150% over allocation of employment land compared with the identified requirement of 23.5ha is excessive and not soundly based. The provision of such a large over allocation will undoubtedly result in many allocated employment sites, particularly brown field sites, remaining undeveloped over the plan period. What will happen to these sites? Are they simply expected to remain vacant? We believe the over allocation of sites is so large that matters should not simply be left to take a natural course. IBC needs to re-examine these allocated sites with 'fresh eyes' and to consider alternative usages or mix of usages including housing.

Examination of Table 3 Land Allocated for Employment Uses<sup>3</sup> reveals an allocation of 7.39ha (IP094, 004,011b, 015,035,037,043,047,051,052,054, and 132) in central Ipswich against a

<sup>2</sup> IBC document PSCD10 – Nathaniel Lichfield & Partners Ipswich and Waveney Economic Areas Employment Land needs Assessment March 2016

<sup>3</sup> IBC document PSCD15 – Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document showing tracked Proposed pre-Submission Main Modifications

requirement of 2.4ha i.e. a margin of 200%. With the exception of IP094 all of the above allocations are a mix with other uses, mainly housing and it would seem entirely feasible and desirable to allocate some of the sites for alternative uses or to adjust the mix of uses. If we exclude the Island Site IP035, which is subject to master planning there appears to be potential in central Ipswich, subject to further study, to reallocate 4.2ha for other uses (IP094, 04, 11b, 15, 43, 47, 51 and 52). This would still leave an allocation of 3.2ha and a margin of 33%, which should be more than adequate in view of the viability issues raised (LPCD26).

Regarding non-central locations it is important to retain employment allocations for Ransomes Europark and Futura Park, which are viewed as strategic employment growth areas by the New Anglia LEP and SCC. Some allocated sites near the Ipswich Sewage Treatment Works (IP058, 67, & 99) would also have limited potential for re-allocation due to odours from the works. Similarly IP152 might have limited potential due to its proximity to the A14 and noise issues. We would suggest one area worthy of reconsideration and further study is North of Whitton (IP140) where IBC acknowledge 'A *comprehensive planning approach is required with land north of the site within Mid Suffolk District*'. This site is directly behind and north of the Anglia Retail Park, close to an A14 interchange and a major supermarket. The Anglia Retail Park has been badly affected by shop closures and is about to lose the large B&Q anchor store. A rethink on its future would seem desirable. Adjacent sites (IP005 Former Toaks Bakery and IP032 King George V Field) have been allocated for housing development. A study with Mid Suffolk on providing an integrated solution possibly extending along the old Norwich Road would appear worthwhile. Another possible location is IP147 (Railway Junction and Hadleigh Road) although there would be noise from the railway.

**The current margin of over 150% over the identified requirement is excessive. Apart from the missed opportunity of sites remaining undeveloped through excess capacity, there is the issue of unregenerated brown field sites remaining a blot on the landscape making Ipswich a less attractive and vibrant town.**

**We believe the over allocation of sites is so large that matters should not simply be left to take a natural course. IBC needs to re-examine these allocated sites with 'fresh eyes' and to consider alternative usages or mix of usages including housing, working with neighbouring Local Authorities where appropriate.**

**Q6.4** *Is policy DM25 soundly-based? If you contend that it is not how should it be modified?*

**Unsound.**

DM25 refers to the protection of employment land. It lists 16 existing employment sites which will be safeguarded for B1, B2 and B8 employment purposes. We have already seen from the above that Ipswich has an excessive allocation of employment sites and there is clear potential to reallocate employment sites to other uses including housing. Although there are advantages in distributing sites of employment throughout the town this fragmented approach lacks focus and results in small parcels of unused employment land being scattered across the Borough. It sterilises sites for alternative uses as evident from the site allocations plan and the restrictions imposed by Policy SP1.

**IBC needs to review and prioritise the 16 sites, deciding which it intends to protect and which would benefit from a more flexible approach allowing a mix or change of use. It needs to rewrite SP1 and DM25 to allow IBC to become more flexible and responsive to changing needs as well as achieving a closer alignment between employment land allocation and the identified requirements.**

## **Matter 7 – Town Centre/Retail Policies and Allocations**

**Q7.1** *Are the policies listed above) and site allocations in connection with retail and town centre development soundly-based? If you contend that they are not how should they be modified?*

**Unsound.**

**Policy CS14 Retail Development and Main Town Centre Uses.**

**Unsound.**

This policy plans *'to extend the Central Shopping Area to include the Westgate quarter and allocate sites for retail development within it. This will enable the delivery in the region of 15,000 sq m net of additional floor space to diversify and improve the retail offer.'*

The policy mainly responds to the findings of the Ipswich Retail Study 2005, as confirmed by the Retail and Commercial Leisure Study 2010. In paragraph 10.20 of the latter (ICD18) it states *'The economic capacity analysis confirms that there is a need for Ipswich to provide new quality comparison goods floor space over the development plan period to help maintain and enhance its position in the retail hierarchy.'* However it warns in paragraph 10.21 *'There is no demonstrable need for new out-of-centre retailing and, in any case, the significant new investment committed and planned for Ipswich town centre should not be jeopardised or harmed by additional out-of-centre retailing in accordance with PPS4'*. The significant new investment referred to was for a new Tesco store in Grafton Way, Ipswich (formerly IP047) with a planned comparison goods floor area of 2,549 sq m (in addition to convenience goods) and a comparison goods store in the Westgate Quarter with capacity of 14,928 sq m (IP040) i.e. a total of approximately 17,500 sq m.

Since then Tesco have abandoned their proposal; there has been no commercial retail interest in the Westgate site and there has been significant out of centre development for comparison goods, namely a major John Lewis Store of 4,000 sq m, Phase 2 of Futura Park of 6131 sq m and a major Next store at Martlesham of 6,405 sq m i.e. approximately 16,500 sq m.

Since then comparison goods store space has contracted in central Ipswich with the closure of the former Co-op departmental store, Next, Laura Ashley, Country Casuals, Bretts (town centre store) and the current conversion of part of the Buttermarket to leisure activities.

It should be noted that on-line shopping is increasingly eating into the retail market particularly since the recent widespread emergence of mobile smart phone technology which brings the added convenience of being able to shop 'anyplace anywhere anytime'.

Events have moved on since the above studies yet CS 14 seems not to have caught up with them.

In 2008 Ipswich Central, the town centre Business Improvement District Company, started working with other partners to develop a long-term plan for the Ipswich centre. This has brought together the key stakeholders who help to shape Ipswich, namely IBC, Ipswich Central, New Anglia LEP, Suffolk County Council, University Campus Suffolk, Ipswich Chamber of Commerce and Ipswich MP Ben Gummer. In July 2015 each party signed off on a Vision for Ipswich - turning the town around to become 'East Anglia's Waterfront Town' together with a set of 21 priorities with timescales<sup>4</sup>. Yet this has failed to be adequately incorporated into the draft Local Plan despite representations from Ipswich Central.

The guiding principle of the vision is *'to connect Christchurch Park and the area around the Museum to the north, to the waterfront south .....and assign the former east – west trajectory (...) to history'*. The Westgate Quarter has been designated *'a residential and cultural area surrounding the New Wolsey Theatre'* as opposed to a retail development. CS 14 does not align with this vision.

CS14 is unsound in that it does not incorporate key aspects of the Vision document ICD79 despite IBC signing up to the document. It needs to be brought up to date. The CS14 plan to

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<sup>4</sup> ICD79 Turning Our Town Around – Advancing the Vision to create East Anglia's Waterfront Town

extend the Central Shopping Area to include the Westgate quarter is contrary to ICD79, is based on out-of-date reports and in our opinion is flawed and ineffective with little chance of finding a major retail outlet, particularly with the recent out-of-centre shopping expansion for comparison goods and expansion of on-line shopping. We would prefer to back the judgement of the business community on this matter.

**In our opinion to make CS14 and associated policies sound:**

1. **The Central Shopping Area should not be expanded into the Westgate quarter.**
2. **The policies should be aligned with the agreed vision and proposals contained within ICD79 in so far as they are relevant to what should be contained with a Local Plan.**

### **Matter 8 – Heritage, Design and the Natural Environment**

**Q8.1** *Are the policies (listed above) in connection with heritage, design and the natural environment soundly based?*

**Generally Sound. We support IBC's general approach to this Matter.**

### **Matter 9 – Transport and Accessibility**

**Subject to a later representation.**

### **Matter 10 – Non-Transport related Infrastructure and Services and Flooding**

**Q10.1** *Are the policies, proposals and site allocations (listed above) in connection with non-transport infrastructure/services and flooding soundly based? If you contend that they are not how should they be modified?*

**Unsound.**

### **CS15 Education Provision.**

**Unsound.**

Paragraph 8.159 states that 'It is not considered by the County Council that a new secondary school site is required within the Borough boundary other than at the Ipswich Garden Suburb'. This may be the case, but there is no contingency if this site cannot be delivered in a timely manner. Our understanding is that secondary schools within Ipswich will be at capacity by 2021. New secondary schools can take many years from conception to occupation, possibly 4-5 years. There are obvious risks in having all the eggs in one basket particularly in view of the risks and slipped timescales associated with the planned IGS development. In addition the IGS Master Plan allocates the school to the Red House sector, which has lagged the other 2 sectors and where outline plans have yet to emerge.

**There is a serious risk that the required new secondary school cannot be delivered in time due to delays by the various parties in reaching agreement on the IGS infrastructure and delays associated with the proposed IGS development. For soundness a fall back option should be included in CS15.**

### **CS16 Green Infrastructure, Sport and Recreation.**

**Generally Sound.**

We support IBC's general approach to this area. However, we are concerned that the policy does not recognise the issue of access to shared outdoor sports space based at schools, especially as these may be academies outside the control of the local authority. The policy needs to reflect the requirement to ensure acceptable access arrangement to all shared outdoor sports space located at schools otherwise there is a real risk that residents will not be

able to access this outdoor space. This would result in a shortfall that will detrimentally affect health and wellbeing.

### **CS17 Delivering Infrastructure.**

#### **Unsound.**

IBC have failed to meet the requirements of paragraphs 156 and 162 of the National Planning Policy Framework regarding the provision of water supply and wastewater and its treatment.

Specifically

- Paragraph 156 NPPF requires a Local Planning Authority to set out strategic priorities for the area in the Local Plan for the provision of water supply and wastewater. This has not been done.
- Paragraph 162 places a requirement on a Local Authority to work with other Authorities and providers to assess the quality and capacity of water supply, wastewater and its treatment and ability to meet forecast demands. This has not been done.

*These are important and serious issues since according to the Suffolk Growth Strategy<sup>5</sup> 'The East of England is the driest part of the country and water supply is critically important, not only to agriculture but to some of the businesses currently located in Suffolk. Limited water availability and increasing demands means that much of the water resource in Suffolk is considered to be fully committed, if not over committed, to existing users. With increased pressure from climate change, population growth and food security, it is more important than ever that water resources are at the centre of planning for the future.'*

This problem and that of sewage treatment has long been recognised as an issue for Ipswich as reported in the 2009 Haven Gateway Study<sup>6</sup>. Paragraph 6.6.2 refers to sewage treatment for the North of Ipswich and it states '*Wastewater treatment will be provided by the Cliff Quay STW, which again has been discussed in Section 6.4. However, wastewater collection and transport of wastewater to the works is seen as a potential issue within the Ipswich area.*' IBC have swept this issue under the carpet and seven years on we are still awaiting a solution to the North of Ipswich wastewater transport infrastructure, which could undermine the viability of the IGS development.

Fresh water supply, wastewater and its treatment cross Local Authority boundaries, e.g. the Ipswich Cliff Quay Sewage Treatment Works treats sewage from Ipswich, Babergh, Mid Suffolk and Suffolk Coastal. It is therefore important that Local Authorities co-operate on strategic infrastructure assessing cumulative growth forecasts as required by the NPPF paragraph 162 and in accordance with the duty to co-operate as required by the 2011 Localism Act. There is no evidence that this has happened since 2009 nor that IBC has requested any such cross boundary collaboration. This matter has simply been ignored despite requests and representations from ourselves over many years.

**For soundness the CS should recognise the importance of and fulfil the requirements of paragraphs 156 & 162 of the NPPF regarding freshwater and waste water infrastructure setting out strategic priorities and including a listing in Table 8A if appropriate.**

### **Matter 11 IP ONE Action Plan (except transport issues)**

#### **CS 3 IP One Area Action Plan**

#### **Sound.**

<sup>5</sup> SCD01 Suffolk Growth Strategy 2014

<sup>6</sup> SCD25 Haven Gateway Water Cycle Study Stage 2 November 2009



## **Chapter 5 <sup>7</sup> PSCD15 – IP-One Area**

### **Generally Sound with the exception of SP10.**

Although there is a reasonable alignment in many aspects with ICD79<sup>8</sup> with the exception of SP10, there are differences in descriptions of land segments and intended uses, which is confusing. For example PSCD15 refers to 'The Education Quarter' whereas ICD79 to the Innovation Quarter, similarly the Waterfront compared with 'The Maritime Quarter', The Ipswich Village and The Civic Quarter, The Mint Quarter and the Easter Quarter etc.

**Since IBC have signed up to ICD79, for clarity The IP-One Action Plan should adopt the same terminology and land definitions and intended land usages unless there are good reasons not to and these should clearly be stated.**

### **Opportunity Area A – Island Site**

**Appears Sound.**

### **Opportunity Area B – Merchant Quarter**

**Appears Sound.**

### **Opportunity Area C - Mint Quarter and surrounding area**

**Appears Sound.**

### **Opportunity Area D - Education Quarter and surrounding area**

**Appears Sound,**

### **Opportunity Area E – Westgate**

**Unsound** (see comments under Matter 7 and need to align with ICD79).

### **Opportunity Area F - River and Princes Street Corridor**

**Appears Sound.**

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<sup>7</sup> PSCD15 Proposed Submission Site Allocations and Policies (Incorporating IP-ONE Area Action Plan) Development Plan document

<sup>8</sup> ICD79 Turning Our Town Around – Advancing the Vision to create East Anglia's Waterfront Town