

## **Appendix 1 Ipswich Borough Council responses to points raised through objections to the Ipswich Garden Suburb proposals**

This note includes responses to representations logged to the following policies: CS1, CS2, CS4, CS5, CS9, CS10, CS12, CS13, CS15, CS16, CS17, CS20, DM5, DM17 and reasoned justification, Table 8B, and the plan vision and objectives 6.7 and 6.8. It includes points raised through 'pro forma' responses.

The Duty to Co-operate and policies CS6, CS7 and CS13 (in relation to the jobs target) were addressed through the Stage 1 hearings held in March 2016 and are not addressed below. The Inspector's Interim Findings report in relation to the stage 1 hearings can be viewed at [https://www.ipswich.gov.uk/sites/default/files/inspectors\\_stage\\_1\\_interim\\_findings\\_19-04-2016.pdf](https://www.ipswich.gov.uk/sites/default/files/inspectors_stage_1_interim_findings_19-04-2016.pdf). The location of jobs is addressed below.

The Council considers the policies to be sound.

The issues raised are addressed by theme below.

### Transport (CS5, CS20, DM17)

The Council considers that the Ipswich Garden Suburb (IGS) site, being about one mile away from the central area of the largest urban area in Suffolk, is within an inherently sustainable location.

The transport modelling which supports the local plan<sup>1</sup> (2010 and updated 2016) indicates that no new road infrastructure such as a northern bypass is needed to support development at IGS. Infrastructure needs for the IGS are identified through policy CS10 and Table 8B. Policy CS10 also requires the preparation of an Infrastructure Delivery Plan to guide the planning applications and this would set out in more detail how the proposed development and infrastructure would be funded and delivered.

Suffolk County Council as highway authority have accepted the principle of up to 5,000 homes being built at IGS without the need for any new road building subject to an appropriate sustainable transport strategy. This is set within a context of the highway authority's general strategy (Ipswich Fit for the 21st Century strategy<sup>2</sup> now known as Travel Ipswich) which is to prioritise sustainable modes / achieve a modal shift and secure better management of the existing network rather than building additional road space.

The Local Plan policies are supported by the more detailed guidance set out in the Ipswich Garden Suburb Supplementary Planning Document Interim Guidance ('the SPD')<sup>3</sup>. The Transport Strategy set out in chapter 6 of the SPD sets out the measures by which sustainable modes of transport could be prioritised for IGS. This, along with the master plan contained in the SPD, illustrates how a good range of local facilities could be provided within walkable neighbourhoods, together with excellent cycle and walking connections within the

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<sup>1</sup> AECOM 2010, Ipswich Transport Model Assessment, CDL reference ICD48; WSP / Parsons Brinckerhoff, May 2016, *Ipswich Core Strategy – Ipswich Traffic Appraisal Modelling Suite (ITAMS) Forecast Model Report*, CDL reference PSCD18; and May 2016, *Letter from SCC to IBC*, CDL reference PSCD18a

<sup>2</sup> AECOM & SCC, 2010, *Ipswich: Fit for the 21<sup>st</sup> Century*, CDL reference ICD46

<sup>3</sup> IBC, 2014, *Ipswich Garden Suburb Supplementary Planning Document Interim Guidance*, CDL reference ICD55

site to maximise accessibility. These measures are among a range contained within the SPD which are considered to encourage lower car usage.

The proposed development will generate vehicular traffic, but the homes are needed and building anywhere in Ipswich will result in traffic increase. Given the scale of the IGS and the comprehensive way in which it is intended to be planned through policy CS10 and the SPD, there is an opportunity to reduce the increase in traffic through the site-wide measures outlined in the SPD and make improvements to sustainable modes of transport in the area such as bus and train services.

A detailed transport assessment is required to be submitted with future planning applications. This will give a more detailed assessment of the traffic resulting from the developments and from this a scheme of mitigation can be determined in order to ascertain the improvements / traffic calming needed to surrounding roads and junctions, cycle / pedestrian connections and increased capacity to public transport. Wherever homes are built, traffic will increase. Transport effects will be considered within Environmental Impact Assessments to be submitted with planning applications.

Regarding a possible future northern route, the Council's position is set out through policy CS20 / paragraph 8.213. This is that further investigation of the need for a northern route would be supported. Until this detailed work has been carried out, the potential impacts of such a route cannot be identified. As detailed in Suffolk County Council's letter dated 24<sup>th</sup> May 2016<sup>4</sup>, a study into the need for additional road capacity to the north of Ipswich is currently underway.

#### Drainage / Flooding

Flooding is addressed through the Strategic Flood Risk Assessment<sup>5</sup>, Policy DM4 of the Core Strategy Review and the Development and Flood Risk SPD<sup>6</sup>. Climate change is addressed through policies CS1 and DM1-2, 4 and 5.

For the IGS, policies are supported by more detailed guidance in the SPD. This sets out more on the SuDS strategy and identifies the preliminary work which has been undertaken and concludes that a strategy can be implemented which is effective. The preliminary SuDS strategy takes account of increases in expected peak rainfall intensity in accordance with national guidance. Details of the adoption and supervision of SuDS, will need to be submitted and approved as part of the planning application before construction can commence. Some further alteration is proposed to the SPD with regards to drainage. The preliminary SuDS strategy will also move from being a draft document to being adopted as part of the SPD. Additional information to be provided in the SPD includes topography and hydrology information for the site.

Drainage effects will also be subject to Environmental Impact Assessments to be submitted with planning applications.

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<sup>4</sup> Letter from Suffolk County Council to Ipswich Borough Council dated 24<sup>th</sup> May 2016, PSCD18a

<sup>5</sup> IBC, 2011, *Strategic Flood Risk Assessment Level 2*, CDL reference ICD33

<sup>6</sup> IBC, 2014, *Development and Flood Risk SPD*, CDL reference ICD38

### Infrastructure and affordable housing (excluding transport)

As for transport above, infrastructure needs for the IGS are identified through policy CS10 and Table 8B. Policy CS10 requires the preparation of an Infrastructure Delivery Plan (IDP) to guide the planning applications and this would set out in more detail how the proposed development and infrastructure would be sequenced. Table 8B of the Core Strategy Review provides a list of infrastructure and service requirements that the Council believes necessary to mitigate the impact of the wider development and secure the delivery of a sustainable urban extension to Ipswich. The triggers in Table 8B have weighed the need for certain items of infrastructure to be delivered with when it can be delivered viably. A caveat is noted in the footnote to the tables advising that the triggers are as stated unless otherwise agreed with IBC through Infrastructure Delivery Plans. Triggers are considered appropriate to give a framework for ensuring necessary infrastructure to support the development is provided. More detailed assessments submitted with the planning applications may require infrastructure to be delivered at different points and policy allows for this where it is agreed with the Local Planning Authority.

The Core Strategy Review seeks to introduce flexibility on land release across the IGS. Some points have been raised regarding the effectiveness of some of the trigger points for infrastructure needing to be based on site-wide housing triggers rather than based on individual neighbourhoods. This is recognised and could be addressed through the IDP.

The Council has procured independent viability advice to help inform the deliverability and viability of the identified infrastructure. The appointed consultant, Peter Brett Associates (PBA), has produced a development appraisal<sup>7</sup> that is considered in accordance with the National Planning Policy Framework and the latest available guidance on viability.

The Ipswich Garden Suburb Viability Appraisal – Final Report (the PBA report referenced above) finds that the IGS development is able to deliver the level of infrastructure as listed in Table 8B alongside affordable housing provision that will be low in the initial phases of development but increase to around the policy target of 35% and above towards the end of the build period. However, the exact level of affordable housing will continue to be assessed throughout the phases of development to take account of changes to any viability inputs such as costs and revenues.

Thus the Council has maintained an overall 35% of floor space affordable housing target for IGS through policy CS12. Policy CS12 allows for flexibility in affordable housing levels where there is demonstrated need to do so.

Development viability testing is an ongoing process, and since the main body of work was carried out by PBA (April - October 2013) it is recognised that certain inputs such as build costs and house prices within Ipswich will have changed. As such, the position as presented by PBA can only be construed as indicative at the time of testing. However further viability work has been undertaken to inform more detailed work related to the IDP, and shall also be undertaken with every planning application to identify appropriate affordable housing levels in light of circumstances related to particular phases of the development together with updated cost inputs.

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<sup>7</sup> Peter Brett Associates, 2015, *PBA Final Report IGS Appraisal*, CDL reference PSCD23

Infrastructure impacts of the proposed development resulting from the allocation will also be quantified in Environmental Impact Assessments which will have to be submitted with individual planning applications.

#### Water and sewerage

Discussions are ongoing between Anglian Water and the developers on the matter. Anglian Water has not raised objections to the Local Plan in relation to the principle of allocating land at the IGS. Anglian Water have advised that they will use their Drainage Area Plan to inform their responses to the detailed schemes for IGS and ensure the best available drainage solution is adopted to serve the development.

#### Country park

The country park is a measure required as a result of the Habitats Regulations Assessment to mitigate the potential impacts of the Borough's growth on the Orwell Estuary Special Protection Area. The Habitats Regulations Assessment (HRA) for the Core Strategy Review<sup>8</sup> indicates that the country park should be provided by the end of the plan period (2031).

The timely provision of the country park is a concern to objectors. The IDP will also address its delivery. It will form the basis for applications to be assessed and appropriate conditions and legal agreements (under S106 of the Town and Country Planning Act 1990) to be agreed to secure the necessary infrastructure at the appropriate times.

#### Health facilities

Following consultation with the local agents for the NHS, a serviced site with contributions is seen as the optimal solution for the delivery of a health centre, as set out in Table 8B. NHS Suffolk representations have identified a deficit in primary health care capacity in the catchment area to IGS. It is therefore advised that in order to ensure new primary health care capacity is delivered for IGS residents, a site of sufficient size to meet the related health care needs is provided, along with developer contributions in order to bring forward a health centre at an appropriate point by an NHS body. It has been ascertained that based on the population arising from IGS, a 0.2ha sized site is an approximation of the area required at this stage, which would include parking, drainage and landscaping.

#### Job Distribution

The Local Plan allocates land for new employment development across the town centre, Waterfront and Ipswich Village, as well as in the Employment Areas dispersed across the Borough. Jobs delivery at some of the allocated sites is further supported by Enterprise Zone status. The SPD sets out a transport strategy for IGS centred on walking, cycling and public transport (see transport above). The Council considers that there will be existing and new jobs available in the central Ipswich and the Employment Areas, which will be

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<sup>8</sup> The Landscape Partnership, 2014, *Habitats Regulations Assessment (HRA) for the Core Strategy Review*, CDL reference SUCD11

accessible from the IGS by sustainable transport modes. The relationship between jobs and housing is explained in the Council's Housing and Employment Integration Statement<sup>9</sup>.

### Brownfield target

The National Planning Policy Framework (Paragraph 111) does not require local planning authorities to set a brownfield target. The plan prioritises brownfield development through policy CS9 but has to recognise that, as the plan period progresses, greenfield development will become more significant. The percentages are shown in Table 4 (page 44) indicate that housing delivery 2001-2011 has been 94.5% on previously developed land, but over the plan period 2015 to 2031 this is expected to decrease to 52.3%.

The policy establishes the important principle that the Council will focus development on previously developed land, whilst recognising that greenfield development will also have an important role to play in meeting objectively assessed housing need. Urban regeneration remains a fundamental aim of the plan strategy.

### Design and Scale

The Local Plan sets out a positive approach to good design through policies including CS2, DM3 and DM5.

In relation to IGS, the SPD provides more detailed guidance. Garden sizes accord with adopted and emerging planning policy and the density is set at a level which balances the desire to make the most efficient use of this greenfield site and still enable an appropriate character to be achieved.

Minimum distances between certain house elevations are advised through the SPD to ensure sufficient spacing between properties and levels of residential amenity (paragraph 5.46). This is in part to make the most of this greenfield site in terms of meeting the housing needs of the borough, although it should be noted that this is at the lower end of the housing densities currently advised in the Council's planning policy (policy DM30). Despite being denser than adjoining areas of housing, there are substantial areas of strategic green space which are required through policy CS10 and this, together with the very clear view on the garden city principles included in the SPD, is considered to provide sufficient basis and does not compromise on the garden suburb character which the plan and SPD seek to achieve. The density proposed (35 dph net) is compliant with policy DM30.

### Air Quality

Potential traffic and air quality effects arising from the IGS allocation were been picked up through the Sustainability Appraisal, which resulted in amendments to the plans as outlined in the Annex to Proposed Submission Sustainability Reports (Dec 2014)<sup>10</sup>.

During the Ipswich Local Plan Stage 1 hearings held in March 2016, the Inspector requested further Air Quality information from the Council. Further work has been carried out to model

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<sup>9</sup> Ipswich Borough Council, 2016, *Housing and Employment Integration Statement*, PSCD08

<sup>10</sup> IBC, 2014, *Annex to Proposed Submission Sustainability Appraisal Reports*, CDL reference LPCD36

air quality and the results set out in a report<sup>11</sup>. The Council is working with the report's authors and the Highway Authority to identify further detail around the mitigation measures.

The Core Strategy review contains requirements for sustainable transport infrastructure. IBC is also currently producing a Cycling Strategy Supplementary Planning Document and a Low Emissions Supplementary Planning Document.

Detailed assessments of air quality and necessary monitoring and mitigation will be determined at planning application stage in the Environmental Impact Assessment. These will be based on traffic modelling submitted with the planning applications.

#### Loss of Biodiversity / Trees / Hedgerows

Policies CS4, DM10 and DM31 of the Core Strategy Review protect biodiversity, trees and hedgerows. Allocations in the Local Plan have been informed by an updated Wildlife Audit for the Borough<sup>12</sup>. The audit identifies the main habitats of value at IGS as being the existing hedgerows, pockets of woodland, and mature trees on the site.

Ecology and Biodiversity assessments are required to be submitted with future planning applications / Environmental Impact Assessments and these will identify necessary ecology / biodiversity measures needed to maintain and enhance the value of site for wildlife. More detailed hedgerow and tree surveys are also required as part of the future planning applications and these would ascertain the arboricultural quality and extent of trees / hedgerows to be retained in the IGS area.

The detailed guidance set out in the SPD also provides a strong and clear 'green' vision for IGS, for example, the 'Character' theme for SPD vision clearly sets out the expectation that the garden suburb will be landscape dominated which includes new planting, open spaces and the retention of the best of existing hedgerows and trees for nature (para 2.17).

The master plan is set around the existing grid of hedgerows and significant trees. Further tree / hedgerow work is required to be submitted with future planning applications, to inform layout and biodiversity matters. Full landscape effects will also be considered within Environmental Impact Assessments.

#### Environmental Impacts

High level assessment of the environmental impacts of the IGS proposals has been undertaken<sup>13</sup> and supports the principle that the site could be used for development.

More detailed environmental assessments will be submitted with the planning applications to identify any specific mitigation which may be required.

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<sup>11</sup>WSP / Parsons Brinckerhoff, May 2016, *Air Quality Assessment*, CDL reference PSCD19

<sup>12</sup>SWT, 2013, *Ipswich Wildlife Audit*, CDL reference ICD24

<sup>13</sup>Arcadis, 2015, *Core Strategy and Policies DPD Review SA and Non-Technical Summary*, CDL reference SUCD9 and Hyder, 2013, *Ipswich Garden Suburb SPD Sustainability Appraisal and Strategic Environmental Assessment* ICD56