



NORTHERN FRINGE PROTECTION GROUP

Safeguarding the Character of Ipswich

Planning Inspectorate Inquiry for IP/24/00172/OUTFL, Land Between Humber Doucy Lane And Tuddenham Lane, Humber Doucy Lane, Ipswich, Suffolk, IBC Appeal reference: APP/R3515/W/24/3350674

On behalf of the Northern Fringe Protection Group, we would like to make the following additional comments in relation to the appeal for the above planning application.

We support the multiple objections raised by both Ipswich (IBC) and East Suffolk (ES) local authorities against this application and believe these to be valid concerns that would need to be addressed for the application to be approved.

IBC is clearly a pro-growth Council with an evidence-based Local plan that is regularly reviewed and updated. It has invested in a detailed Masterplan for the Ipswich Garden Suburb that will aid the delivery of new homes whilst ensuring this will be delivered sustainably. IBC has invested in a small team of dedicated Planning Officers to facilitate the delivery of the IGS, which is working well. IBC is clearly not opposed to building new homes on greenfield land whilst taking account of the impacts on the environment and existing infrastructure so that these can be mitigated where necessary. IBC is only too aware of the major travel and capacity issues that the town faces due to physical constraints impacting the road network and rightly seeks mitigation measures from developers to deliver the required levels of modal shift to allow developments to proceed. There is no alternative to this approach, which was agreed by Planning Inspectors at the recent Local Plan hearings (consistent with previous Local Plans decisions). IBC successfully secured substantial funding from the Housing Infrastructure Fund for new infrastructure required to unlock the IGS for developers to build new homes. This included funding for a new pedestrian/cycle bridge and a road bridge without which much of the IGS would not have been approved. Major junction improvements for the A1214 are also required to unlock the IGS and have been scoped out with developers. It is worth noting that outline planning consents for most of the IGS had already been granted and detail applications approved for several phases that have not yet been started or completed by developers. A revised application for Red House Farm has also been submitted following detailed discussion with SCC and IBC to address outstanding issues. IBC, along with Suffolk County Council (SCC) have worked hard with developers to agree the major infrastructure improvements required for Westerfield Road. This may have slightly delayed the commencement of building on these sites but obviously it is important to get the new junction and the cycling/pedestrian infrastructure designs right to enable access to and from the IGS sites in a safe and efficient manner for all users. It is reasonable and proper for IBC to do the same for Humber Doucy Lane, indeed it would be a dereliction of duty if IBC did not do this. Furthermore it would completely undermine the hard work on transport infrastructure and sustainable travel obligations that IBC has undertaken to ensure the successful delivery of the IGS. IBC is also working hard to deliver new housing developments on brownfield land in and around the town centre. IBC has set up its own house building company, [Handford Homes](#), that has quickly established a successful track record in developing brownfield sites in Ipswich, some of which would not have been developed otherwise and/or brought forward as quickly.

It is also worth noting that IBC has been successfully re-developing both the old Sroughton Sugar Beet site and the Cranes industrial site for employment purposes. IBC is clearly pro-actively

encouraging new developments across Ipswich for both new businesses and homes. IBC's decisions on Humber Doucy Lane should be respected accordingly.

We note the contributions required by SCC for primary and high school places for the new schools to be built on the IGS. Without these schools in place, there will be no places available in the surrounding area hence the need for a later delivery of this site in accordance with the approved Local Plan, where Planning Inspectors specifically addressed this concern. The only option for parents will be to drive their children to school, which will fail to deliver the modal shift requirements embed in IBC's Local Plan and is in breach of national planning sustainability requirements.

We support the multiple objections raised by SCC in its capacity as the Local Highway Authority. The non-provision of integrated cycling and pedestrian routes will fail to achieve the 15% modal shift requirement on the development in IBC's Local Plan in breach of its sustainable travel requirements. The proposed junction design is clearly not acceptable and substantially greater improvements to road, pedestrian, cycling and bus infrastructure are required before this application could be considered compliant with Local Plan and national planning sustainable access and travel requirements. We note that all three Parish Councils around the development raise similar concerns on the impacts on local roads, access to/from the development and lack of safe pedestrian and cycling infrastructure. The strong consensus on these issues demonstrate that rejecting the application was the correct decision.

The implications of this development coming forward before the junction improvements required under the IGS Masterplan have been made and the new schools in the IGS have been delivered would also need to be assessed. Ipswich suffers from major traffic issues, especially when the Orwell bridge, Copdock junction and surrounding A14 have any form of incident. The A1214 endures the most of this as it is the only alternative route for road users and the large amount of road freight traffic in relation to Felixstowe docks, which will further increase with Sizewell C. The IGS Masterplan and Local Plan have an agreed timescale for A1214 junctions improvements, without which the A1214 will not be able to cope with additional traffic from the Humber Doucy Lane development and it will be unsustainable.

We agree with the objection raised by National Highways. As we previously mention, traffic is a major issue in and around Ipswich and clearly the application fails to provide sufficient information for the application to be accurately assessed.

We object that the appellant's Transport Assessment is based on a traffic study conducted on the 12th October 2023.

We share the concerns of Network Rail on the potential impact of traffic on Westerfield railway crossing. We have raised concerns on the safety of pedestrian and cycling infrastructure around this crossing in our response to the recent consultation for Red House Farm.

We support the objection raised by SCC in relation to the drainage and flood risk assessment especially as the area is known to flood. The applicant has clearly not provided sufficient detail for this application to be approved and there is no Masterplan or Framework to address this issue. Both IBC and SCC have worked hard to ensure the IGS has an acceptable SUDs system to prevent flooding. It is clearly their duty to do likewise for this development under national planning policy.

We agree with Sport England's objection to the loss of the rugby playing field, without any replacement being proposed.

With respect to the comments in relation to the build out rate of the Ipswich Garden Suburb, it is worth noting that the appellant Barrett David Wilson Homes is the Phase 2 builder and is in control of some of the slight shortfall. We also note that Barrett David Wilson has recently submitted a Variation application for Phase 2, which will not help their build rates. We are aware that Crest Nicholson, the Phase 1 developer, has had difficulties in selling completed homes at the prices they would be prepared to sell at despite offering discounts, funding arrangements and property enhancements. Clearly these are beyond the influence of IBC as is the cost of living crisis which impacts on the purchasing power of most prospective new home owners. Obviously IBC has no way of forcing developers to build the homes they have planning consent for.

We note the appellant's spurious argument around the difference between a Framework and a Masterplan. Of course, what matters is whether the appellant has provided sufficient detail for the application to be assessed and that the proposals provided meet Local Plan and national planning requirements. As the multiple objections by multiple organisations demonstrates, there is clearly insufficient detail in the application and the information provided fails to meet Local Plan and national planning) requirements. This appeal should be rejected accordingly.

If possible, we would appreciate the opportunity to present our views at the Appeal Inquiry.