

Statement of Common Ground – General

PINS References:

APP/R3515/W/24/3350673 (A)

APP/R3515/W/24/3350674 (B)

Appeals by Barratt David Wilson and Hopkins Homes

Site Address: Land north-east of Humber Doucy Lane, Humber Doucy Lane,
Ipswich, IP4 3QA

Statement of Common Ground

This Statement of Common Ground has been produced to assist the Inspector in the determination of two linked appeals against the refusal of hybrid applications for part full and part outline planning permission by Ipswich Borough Council and East Suffolk Council ("the Councils"), processed under application references IP/24/00172/OUTFL and DC/24/0771/OUT respectively. Both decision notices are dated 4th June 2024.

Areas of Agreement

The Proposed Development

[NB For the Inspector's benefit, the plans listed below are the same as identified and agreed as being the application plans on Day 1 of the Inquiry]

Detailed element submitted: The parties agree that the detailed element of the hybrid application relates to the means of vehicular, pedestrian and cycle access to the Appeal Site, as shown on the following plans:

- 890695-RSK-ZZ-XX-DR-C-0001-P02-Proposed Access Strategy Sheet 1 [AD2(10)]
- 890695-RSK-ZZ-XX-DR-C-0002-P02-Proposed Access Strategy Sheet 2 [AD2(10)]
- 890695-RSK-ZZ-XX-DR-C-0003-P02-Proposed Access Strategy Sheet 3 [AD2(10)]
- 890695-RSK-ZZ-XX-DR-C-0004-P02-Proposed Access Strategy Sheet 4 [AD2(10)]
- 890695-RSK-ZZ-XX-DR-C-0005-P02-Proposed Access Strategy Sheet 5 [AD2(10)]
- 890695-RSK-ZZ-XX-DR-C-0006-P01-Proposed Access Strategy Sheet 6 [AD2(10)]
- Those elements coloured on the above plans are part of detailed element of the hybrid application. Those coloured white are not part of the detailed element.

Outline elements submitted: Other than the above specific matters of detail, the application is wholly in Outline with all matters reserved, and with the following parameter plans submitted for approval:

- HDL-PRP-XX-XX-DR-A-08201_P01 Parameter Plan - Land Use [AD2(2)]
- HDL-PRP-XX-XX-DR-A-08202_P02 Parameter Plan - Green and Blue Infrastructure [AD2(3)]
- HDL-PRP-XX-XX-DR-A-08203_P02 Parameter Plan - Access and Vehicular Movement [AD2(4)]
- HDL-PRP-XX-XX-DR-A-08204_P02 Parameter Plan - Public Transport [AD2(5)]
- HDL-PRP-XX-XX-DR-A-08205_P03 Parameter Plan - Pedestrian Movement [AD2(6)]
- HDL-PRP-XX-XX-DR-A-08206_P02 Parameter Plan - Cycle Movement [AD2(7)]
- HDL-PRP-XX-XX-DR-A-08207_P01 Parameter Plan - Maximum Density [AD2(8)]
- HDL-PRP-XX-XX-DR-A-08208_P01 Parameter Plan - Maximum Height [AD2(9)]

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Other plans submitted: The parties agree that the only other formal application plans submitted as part of the applications are the Site Location Plan (HDL-PRP-XX-XX-DR-A-08200_P01) (AD2(1) and Existing Site Context Plan (HDL-PRP- XX-XX-DR-A-08103_P01).

Supporting documents submitted: The parties agree the documents submitted to support the application and informed the local planning authorities in reaching the decision on the application were as set out below:

- Acoustic Report – Produced by 24 Acoustics [AD18]
- Air Quality Assessment – Produced by Air Quality Consultants [AD19]
- Arboricultural Impact Assessment – Produced by Haydens Archaeological Assessment RPS [AD20 and AD20.1]
- Biodiversity Net Gain Assessment – Produced by CSA [AD21]
- CIL Form – Produced by P2P [AD22]
- Cover Letter dated 29 February 2024 (produced by P2P)
- Design and Access Statement (incorporating statement on crime prevention and open space strategy) – Produced by PRP Architects [AD16]
- Geotechnical and Geoenvironmental Interpretative Report – Produced by RSA Geotechnics Ltd [AD13]
- PEA Report and Ecological Impact Assessment– Produced by CSA [AD24]
- Energy and Sustainability Statement – Produced by JS Lewis [AD25]
- Flood Risk Assessment and Drainage Strategy – Produced by RSK [AD10.1, AD10.2 and AD10.3]
- Habitat Regulations Shadow Report – Produced by CSA [AD30]
- Health Impact Assessment – Produced by P2P [AD31]
- Heritage Statement – Produced by MJK Build [AD32]
- Landscape and Visual Impact Assessment – Produced by CSA [L4]
- Open Space Assessment – Produced by P2P [AD15]
- Planning Statement (incorporating Affordable Housing Statement and Draft Heads of Terms) – Produced by P2P [AD33]
- Retail Impact Assessment – Produced by Peacock & Smith [AD34]
- Statement of Community Involvement – Produced by Concilio [AD35]
- Site Waste Management Plan – Produced by BDW/Hopkins [AD36]
- Transport Assessment – Produced by RSK [AD37.1-AD37.8]
- Travel Plan – Produced by RSK [AD38 and AD38.1]
- Utility Statement – Produced by BDW/Hopkin [AD39.1 and AD39.2]

The parties agree the following illustrative documents were submitted to support the application and informed the local planning authorities in reaching the decision on the application but are not proposed to form an approved plan:

- HDL-PRP-XX-XX-DR-A-07207-P02 – Illustrative Framework Plan [AD2 (11)]
- 6675_116_A – Landscape Strategy [AD17]

Documents submitted during the appeal process:

- CSA Ecological Impact Assessment (CSA/6675/04C) May 2024 [B4]
- CSA Supplementary Ecology Report: Bats (CSA/6675/10) [B7]
- CSA Supplementary Ecology Report: Dormouse (CSA/6675/11) [B8]
- CSA Supplementary Ecology Report: Birds (CSA/6675/12) [B9]
- CSA Supplementary Ecology Report: Great crested newt (CSA/6675/13) [B10]

- Proposed Surface Water Drainage Strategy 890695-RSK-ZZ-XX-DR-C-0007-P02 (04-12-2024) (18.11.24) [APD1] (which was produced as part of the discussions with the LLFA on the drainage statement of common ground).
- Proposed Surface Water Drainage Strategy 890695-RSK-ZZ-XX-DR-C-0007-P03 submitted as Appendix B of Mr Fillingham's rebuttal.

Weighting

All parties agree to you the terminology below in the Planning Proof of Evidences:

- No weight/harm/benefit
- Minimal weight/harm/benefit
- Medium weight/harm/benefit
- Substantial weight/harm/benefit
- Very Substantial weight/harm/benefit

Housing Land Supply:

The applications were determined under NPPF (Dec 2023) [NP3], at which point para 76 did not require either ESC nor IBC to identify and update annually a 5 year supply of housing sites. This is because both Local Plans were less than 5 years old (the SCLP was adopted on 23 September 2020, and the IBC Local Plan was adopted on 22 March 2022).

The latest version of the NPPF (Dec 2024) [NP2] reinstates the requirement for LPAs to demonstrate a 5 year land supply irrespective of the age of the Plan.

The parties agree that East Suffolk Council can demonstrate a 5 Year Housing Land Supply for the Suffolk Coastal Local Plan area and that the 2023 HDT result for East Suffolk published in December 2024 is 103%.

Ipswich Borough Council confirms that it cannot demonstrate a 5 Year Housing Land Supply and it has calculated the figure is 3.04. The 2022 HDT result for Ipswich Borough Council was 116%. The 2023 HDT result for Ipswich Borough Council is 77% (which would require a 20% buffer), however IBC have written to MHCLG to dispute this, as it considers that when correctly calculated, the result should have been 85.375% (which would require a 5% buffer).

The Appellant understands that the material to support IBC's calculations is not currently available and is therefore unable to confirm agreement to the figures quoted, but equally does not intend to provide contrary evidence to contest IBC's calculation.

The housing trajectory for IBC projects the allocation site coming forward towards the end of the plan period, between Year 11 (2031/32) and Year 15 (2035/36). The housing trajectory in the Suffolk Coastal Local Plan anticipates the allocation site coming forward between 2033/34 and 2035/36.

Based on Paragraphs 2.1 and 2.2 of the SoCG6 – Early Years and Education, Libraries and Waste matters the necessary primary school places generated by the development can be accommodated within Rushmere Hall Primary School. Therefore the need for the delivery of

primary school places is no longer a constraint in the timeframe for the delivery of houses on the appeal site.

The Appellant agrees that these are the trajectories in the Local Plans, but in the light of the preceding paragraphs, and in the light of the Appellant's evidence as regards the superseded rationale behind these trajectories, the Appellant considers the trajectories to be wholly out of date and considers that they should carry no weight in the Inspector's consideration.

Areas of Disagreement

The following is a summary of the main points of disagreement between the Appellant and Joint Councils as of the date of this SoCG. It does not seek to cover every point in dispute, nor those raised by Suffolk County Council.

Masterplanning: The parties disagree over whether the proposed development complies with the requirements of Policies ISPA4 and SCLP12.24, regarding the need for masterplanning.

Landscape buffer to North and North-East of Site: There is disagreement over the adequacy or otherwise of the proposed landscape buffer along the north and north-eastern boundaries to the Site.

Humber Doucy Lane Set Back: There is disagreement as to whether the set back from Humber Doucy Lane allows for an appropriate landscaped response to be achieved. Specifically, the LPAs consider the set back to be insufficient to provide a landscape strip which they consider necessary to allow for significant tree planting as well as accommodating other secondary uses such as SUDS and active travel infrastructure.

HRA/SANG: As set out in SoCG9 *"it remains disputed by the parties whether the package of mitigation measures provided, specifically the quantum and design of the on-site Suitable Alternative Natural Greenspace (SANG), is adequate to conclude that the proposed development will not have an adverse effect on the integrity of the identified European sites."*

Loss of sports provision: The parties disagree as to whether, in light of the loss of the existing rugby pitches, the proposal complies with Policy DM5. The parties agree that the latest temporary planning permission for the use of the rugby pitches expired in August 2019 [OT3].

Open Space – quality - There is disagreement as to the extent to which the open space provided on site constitutes natural and semi-natural green space (the claimed figure being 9.56ha within section 7.1 of the DAS).


Open Space – quantum - The parties disagree whether the proposed development provides policy-compliant levels of open space, having regard to the open-space requirements in Policy DM6, as well as (in the view of the LPAs) the need to provide on-site SANG. The LPAs position is that there is insufficient open space to provide an on-site SANG of a requisite size, together with open space, sports and recreation facilities which are not compatible with SANG (and therefore are to be provided in addition to the SANG provision).

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Quantum of housing: The parties do not agree whether the quantum of housing proposed as part of the appeal scheme has been demonstrated to be appropriate.

Signatures:

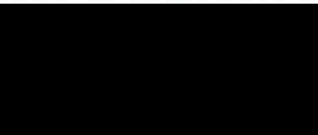
ON BEHALF OF IPSWICH BOROUGH COUNCIL

Signed.. 

Name: Lisa Evans

Date: 11/2/2025

ON BEHALF OF EAST SUFFOLK COUNCIL

Signed 

Name.....Ben Woolnough – Head of Planning and Building Control.

Date.....11.02.25.....

ON BEHALF OF THE APPELLANTS

Signed..... 

Name.....Kevin Coleman – Phase 2 Planning

Date.....11/02/25