

Representations to the Suffolk Coastal First Draft Local Plan

Introduction

These representations have been prepared by Phase 2 Planning and Development Ltd on behalf of The Kesgrave Covenant Ltd (KCL) and relate to land within KCL's control to the north of Humber Doucy Lane, Ipswich, as shown on the attached draft masterplan (drawing reference C13089/01). The plan shows that the KCL land falls within both Ipswich Borough Council's (IBC) boundary and also within Suffolk Coastal District Council's boundary (SCDC). The attached masterplan is illustrative, but shows the potential extent of development that could be accommodated, and a preliminary layout. The draft masterplan envisages development falling mostly within IBC's boundary but with some development within SCDC. KCL are keen to work with both Councils to agree the extent of development and associated land uses.

Land North of Humber Doucy Lane, Ipswich

It is proposed that the draft Local Plan is amended to include land on the northern side of Ipswich, north of Humber Doucy Lane. Our clients, KCL, control a large area of land in this location, which adjoins the built up area of Ipswich and includes land within Ipswich and also Suffolk Coastal. A masterplan has been prepared to show how this land could provide a sustainable urban extension to Ipswich. There is flexibility to amend the masterplan, both in terms of the extent of the development proposed and the uses shown, however the development is capable of providing a number of benefits which can be summarised as:

1 Delivery in a Sustainable Location

- Identified as potentially suitable within the SHELAA (further comments in relation to this assessment are set out below). The part of the site falling within IBC's boundary was identified in Ipswich's Strategic Housing Land Availability Assessment (2013) as being suitable and available for development (LPA site ref: IP184).
- Making effective use of land and delivering housing in a sustainable location immediately adjoining the urban area of Ipswich. Based on a notional site coverage of 70% and a notional density of 30dph, it is considered that this site could accommodate around 525 dwellings in total, of which 150 would fall within Suffolk Coastal's boundary. This echoes the findings of the SHELAA which identifies that part of the site falling within Suffolk Coastal (LPA ref: site no 1083) would be capable of accommodating 148 dwellings.

2 Mix of Uses and Tenures

- Whilst the proposals are for a predominantly residential development, there are opportunities for a mix of uses in accordance with paragraph 91 of the NPPF.
- The site could accommodate a primary school, with an on-site early years facility should this be required. Contributions would be provided towards secondary education.
- Employment opportunities are provided within the Tuddenham Road Business Centre (within Ipswich Borough Council's boundary) and there are also opportunities for further employment within the business park. There are also local employment opportunities at the care home at Westerfield House, with the wider site being the subject of a current planning

application for a care village. Additional employment opportunities would arise from any other non-residential elements of the development, such as the primary school.

- It is proposed that the residential element of the scheme would provide a mix of tenures and house sizes, making a valuable contribution towards the housing needs of the area, fully according with the NPPF and emerging local policies SCLP5.8 (Housing Mix) and SCLP5.10 (Affordable Housing on Residential Developments).

3 Public Open Space and Pedestrian Accessibility to the Surrounding Countryside

- The proposals include provision of accessible public open space for the benefit of existing and proposed residents. The illustrative masterplan shows a fairly large area of open space to the north of the railway. This area is notional at this stage and there is flexibility in terms of the overall size and location of open space provision. It is also proposed that there will be smaller areas of open space integrated within the development. This approach is consistent with draft Policy SCLP8.2 (Open Space) which recognises that the provision of open space can encourage active lifestyles and increase participation in formal and informal recreation.
- There are existing rights of way to the north of the railway line which could be enhanced to increase pedestrian connectivity and provide enhanced cycle access.

4 Highways and Accessibility

- The site benefits from good public transport accessibility. Humber Doucy Lane, which runs along the southern boundary of the site, is very well served by existing bus services from Beestons, Suffolk on Board and Ipswich Buses. Rail services at Westerfield Junction are easily accessible and around 2km from the site.
- The site also benefits from good road access and lies within approximately 1.5km of the A1214, which is part of the principal road network. The area is served by four existing radial routes, which give direct access to the A1214. There is good access to a number of distributor routes and no access issues.
- The site benefits from good accessibility to services and facilities with the nearest local centre located within walking distance (approximately 800 metres).
- The development of this site promotes sustainable transport in accordance with paragraph 108 of the NPPF as:
 - It is located in a sustainable location, adjoining the existing built up area of Ipswich, with good access to facilities and services including good access by sustainable transport modes.
 - It is capable of providing safe and suitable access to the site for all users. The site can be easily accessed as the land parcels proposed for development have significant frontages onto Humber Doucy Lane.
 - As far as we are aware SCC Highways have not expressed any objections to the proposal to allocate development in this area.
 - A number of transport/highways mitigation measures will be considered as part of the proposals including upgrading of the junctions of Humber Doucy Lane/Tuddenham Road and Tuddenham Road/Church Road.
- The Local Plan Transport Modelling Report prepared by WSP in 2018, as set out in more detail below concludes that Suffolk can accommodate the proposed housing growth.

5 Drainage and Flood Risk

- The site is located within Flood Zone 1. The proposed development will contain SUDS to control discharge and ensure that there is no increased risk of flooding off-site.
- The proposals have been discussed in principle with SCC Drainage and they have not raised any objection to the proposals in drainage terms. There are existing public sewers close to the site into which foul drainage from the development could be discharged via a new on-site foul pumping station and a new off-site foul rising main.

6 Landscape Impact and Ecology

- The area proposed for development is of low landscape sensitivity, characterised by the hard urban edge of Ipswich.
- There are no known features of ecological or geological importance on or adjacent to the site.

7 Viability

- There are no known abnormal costs that could affect the viability of the site.

8 Deliverability

- The land proposed for development is all controlled by KCL and there are no issues affecting the deliverability of this site. KCL have a good track record of delivering large scale housing developments, including Grange Farm at Kesgrave.

It is envisaged that development could come forward towards the end of the five year period or during the 5 to 10 year period. It is anticipated that it would take around 5 years to complete.

In summary, therefore this site is eminently suitable for development and is sustainably located with no insurmountable constraints and therefore should be included within the Local Plan as an allocation.

Consideration of land on the Edge of Ipswich

Whilst the specific merits of the site are set out above, it is also relevant to consider the wider context in relation to the land on the edge of Ipswich. The draft Local Plan clearly recognises the importance of Ipswich when considering rural areas within its vicinity, recognising that these areas are well served by a range of services, facilities and public transport, employment and housing opportunities (paragraph 12.128). However it identifies a number of reasons why development on the eastern edge of Ipswich is not being pursued through the Local Plan strategy and our response to these reasons is set out below.

- Education capacity - Given that the proposed development on land to the north of Humber Doucy Lane would generate around 131 primary school pupils (based on 525 dwellings across the two local authority areas), it is suggested that the proposals could accommodate a primary school, which could include on-site early years provision if required. With regard to secondary school provision this is an issue for the wider area. However, the development would enable an appropriate contribution to be made and it would be for the County

Council to decide which existing schools would be expanded or whether a new school will be required. This accords with draft Policy SCLP3.6 (Infrastructure Provision).

- Ipswich Northern Route – The proposals will not blight future options for the route as the potential routes do not affect the area shown on KCL's draft masterplan.
- Cumulative impact of development - The development at Brightwell Lakes is located around 7km from the land falling within the control of KCL and therefore the two developments could come forward at the same time without adverse cumulative impacts.
- Local Plan Strategy - Ipswich is the county town and a major centre of population, providing employment and higher order service needs for the surrounding areas. Allocation of land on the edge of Ipswich has the potential to provide development that is sustainably located with good access to services and facilities.

In addition, the highway capacity of the area is questioned and the Alternative Policy Options report appended to the Local Plan. This document states that there are pressures on the local road network around Ipswich, which would be exacerbated by locating new development within the area if not mitigated.

In response the Local Plan Transport Modelling Report, an evidence-based document prepared by WSP (2018) to inform the Local Plan, assessed the capacity of the highways network to accommodate potential development sites including land at Humber Doucy Lane. It assumed 375 dwellings in this location within IBC's boundary and 150 within SCDC's boundary and found that although there are current capacity issues in the vicinity, even with the additional traffic generated with the proposed development the local highway network will still be operating within capacity. It concludes that Suffolk can accommodate the proposed housing growth including land at Humber Doucy Lane and therefore there is no justifiable reason to reject this site for development on the basis of highway capacity as identified by paragraph 109 of the NPPF.

We submit that our client's land at Humber Doucy Lane is suitable for development as part of a wider scheme which includes land within Ipswich Borough Council's boundary. We hope that it will be possible for the two Councils to liaise more closely to consider cross-boundary development and align their Plans accordingly to ensure that needs of the Housing Market Area is met in the most appropriate and sustainable locations.

This approach accords with guidance contained within the National Planning Policy Guidance on the Duty to Co-operate and the findings of the Ipswich Local Plan Inspector's Report (21st January 2017). It also better reflects the various options put forward for this part of the district within the Issues and Options consultation document, which all identified a greater proportion of housing to be located in the East of Ipswich area than the strategy that is currently proposed.

Consideration of the Site through the Council's SHELAA

The SCDC SHELAA identifies the part of this site that falls within Suffolk Coastal as potentially suitable for development (site reference 1083 Land opposite 309-405 Humber Doucy Lane, Rushmere St Andrew). However, the SHELAA assessment for this site appears to consider this land in isolation rather than as part of a wider development that would include land within Ipswich's

boundary. Considering the wider site will result in a reassessment of the site in relation to the criteria set out within the SHELAA as follows:

- Access to the site – the site would be accessed from Humber Doucy Lane and not narrow access roads to the north of Humber Doucy Lane as identified in the Council’s SHELAA assessment. Therefore, the impact should be shown as green rather than amber as no issues are identified.
- Landscape and townscape – the site would come forward as part of a wider development including land within Ipswich’s boundary and therefore would join the existing urban area. The impact should be amended from amber to green as there are no landscape or townscape issues.
- Transport and roads – the proposals would not involve the use of Tuddenham Lane for access purposes and therefore no improvements would be required to this road as a consequence of the proposed development. The site would not be influenced by the Ipswich northern bypass, a point agreed during informal discussions with IBC officers. Discussions with the Highway Authority (HA) have already occurred and the HA raise no objections on highway grounds. For these reasons, the impact of this site should be changed from amber to green.
- Compatibility with neighbouring uses – there is a water tower adjoining this site; however, the proposed dwellings would be sufficiently separated so that the water tower was not unduly dominant. The site would come forward as part of a wider development and therefore would not be separated from the Ipswich urban area. The impact of this site should be changed from amber to green.

It is concluded, therefore, that when considering the site in the context of the wider cross boundary development site its assessment can be wholly positive with all criteria receiving positive assessment.

Conclusions in relation to Soundness

As currently drafted, in our view SCLP2.1 and SCLP3.2, the strategy for growth and the spatial distribution of the residual housing requirement, do not meet the ‘tests of soundness’ identified at paragraph 35 of the NPPF for the following reasons:

- **Positively prepared** – the strategy should demonstrate that the needs of the Ipswich Housing Market Area can be met by the relevant authorities and, if Ipswich’s needs cannot be met within its tightly drawn boundaries, consideration should be given to identification of land in appropriate locations within SCDC’s boundaries to accommodate that need.
- **Justified** – the strategy should follow one of the alternative options put forward at the Issues and Options stage, which include allocation of land on the edge of Ipswich for development.
- **Effective** – the NPPF recognises the importance of effective cross boundary strategic matters and it is considered that consideration of the wider Ipswich Housing Market Area would provide a more effective strategy.
- **Consistent with national policy** – for the reasons identified above, the strategy is not considered to be consistent with national policy.

We consider that there are great benefits in Suffolk Coastal and Ipswich liaising more closely with regard to cross-boundary development and align their Plans accordingly. It is important that both Councils deal with housing needs across the Ipswich Housing Market Area (HMA), in accordance with the recommendations of Ipswich Borough Council's Local Plan Inspector. In the event that the needs of the HMA cannot be met in full, both Plans will fail under the Duty to Co-operate. It is relevant to note that under the new NPPF (2018) meeting the housing needs from neighbouring areas is now integral to Plan preparation, as detailed in paragraphs 11 and 26.

In light of the above, our view is that Policies SCLP2.1 and SCLP3.2, the strategy for growth and the spatial distribution of the residual housing requirement contained within the Local Plan, should be reviewed to allow land at Humber Doucy Lane on the north east of Ipswich to come forward for development.

**Illustrative Master Plan
(1:2500 @ A1)**

Land at Humber Doucy Lane, Ipswich
ref: C13089/01
September 2018



-  Development site boundary
-  Proposed junction improvements
-  Existing tree belt, hedgerow and woodland
-  Proposed structural landscaping

