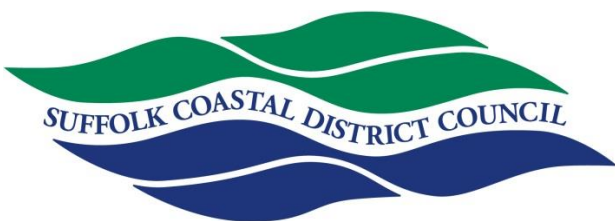


# Representations on the Suffolk Coastal Final Draft Local Plan

In representor order

The Kesgrave Covenant Ltd Representations

Representations period: 14 January to 25 February 2019



# The Kesgrave Covenant Ltd

## Policy SCLP3.1: Strategy for Growth in Suffolk Coastal District

<b>Rep ID</b>	1162
<b>Organisation Name</b>	The Kesgrave Covenant Ltd
<b>First Name</b>	
<b>Surname</b>	Sir/Madam
<b>Agent Organisation</b>	Phase 2 Planning & Development Limited
<b>Agent First Name</b>	Emma
<b>Agent Surname</b>	Walker
<b>Do you consider that this part of the Plan meets the legal and procedural requirements?</b>	Yes
<b>Do you consider this part of the Plan has met the tests of soundness?</b>	No
<b>Do you consider this part of the Plan to be unsound because it is not:</b>	
<b>Details of Representation</b>	<p>This representation is made by Phase 2 Planning and Development Ltd on behalf of the Kesgrave Covenant Ltd in relation to Policy SCLP3.1.</p> <p>Whilst we strongly support the inclusion of land within our client's control at Humber Doucy Lane, Ipswich for development, we object to the second part of Policy SCLP3.1, which, as currently drafted, does not include reference to the delivery of cross-boundary housing on the edge of Ipswich, despite the identification of land at Humber Doucy Lane within both the draft Plans.</p> <p>Our clients, The Kesgrave Covenant Ltd (KCL) control land to the north of Humber Doucy Lane, Ipswich as shown on the attached masterplan (drawing reference C13089/01). This land has now been identified by Ipswich Borough Council (IBC) and Suffolk Coastal District Council (SCDC) for development towards the end of the Plan period. KCL support the inclusion of this site for development and are keen to work with both Councils to agree the extent of development and associated land uses.</p> <p>The attached masterplan has been designed to show how the land within KCL's control can 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:</p>

## 1 Delivery in a Sustainable Location

- The site is well located, adjoining the existing built up area of Ipswich and has good public transport access and also a range of services and facilities within the vicinity of the site. The representation site also lies in relatively close proximity to the proposed Ipswich Garden Suburb, which will provide a range of local facilities and services. Further details in relation to the accessibility of the site are set out later in this representations.

- The identification of this site follows its identification as potentially suitable within both IBC and SCDCs SHELAAs (refs: IP184c, IP303, IP344 and IP350 (Ipswich) and 1083 (Suffolk Coastal) respectively). The capacity estimates for the site accord with our initial estimates (i.e. approximately 375 within IBC's boundary and 150 within SCDC area).

## 2 Mix of Uses including Education Provision

- 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. It is also relevant to note that there are a range of services and facilities in the vicinity of the site and this will be further enhanced by the development of the Ipswich Garden Suburb to the west of the site providing the residents of the scheme with good access to a range of local services and facilities. The provision of non-residential uses would be subject to discussion and agreement with the local planning authorities.

- 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 early years facility.

- It is proposed that contributions would be made towards additional primary and secondary school places as part of the development. It is noted that contributions may be used towards the provision of additional spaces at the Ipswich Garden Suburb. We had previously suggested that a primary school could be provided as part of the development at Humber Doucy Lane. Given the relatively early stages of the Ipswich Garden Suburb, there is merit in ensuring that the new schools have sufficient capacity to accommodate the requirement for additional school places generated by the proposed development at Humber Doucy Lane. We had previously suggested the inclusion of a primary school within the representation site, and whilst there is flexibility to provide this, if necessary, we will be guided by Suffolk County Council.

- With regard to timescales for secondary school provision, the Ipswich draft Plan identifies at table 8B that a 1,200 space secondary school would be provided as part of the Ipswich Garden Suburb development

on the eastern side within the Red House Neighbourhood. The adopted SPD (2017) states based on pupil forecasts from SCC a secondary school would be needed by 2021 and that the Infrastructure Delivery Plan will need to secure the delivery of the school no later than 2021, unless it is demonstrated that project delivery, phasing and other mitigation suggests an alternative timetable would be more appropriate.

- KCL seek to work with SCC to ensure that primary school provision, whether at the Ipswich Garden Suburb or on the representation site, can be provided to enable earlier delivery of development. The three neighbourhoods of Ipswich Garden Suburb will each provide a primary school. The SPD identifies that a primary school will be co-located with the secondary school in the Red House Neighbourhood along with two primary schools in the two other neighbourhoods. Whilst there is no information publically available in relation to timescales for delivery of these schools, they will need to be delivered at a pace that reflects the new housing development in the area and therefore the need to hold back development at Humber Doucy Lane until 2031 due to primary school capacity is questioned.

- It is noted that SCDC have identified that the site should incorporate 0.1ha land to be provided within the masterplan area for early years provision, with an additional contribution to be provided to provide additional spaces at Witnesham. This approach is endorsed.

- The draft masterplan shows land to the north of the railway for open space, including sports pitches. Further details are provided in section 4 (Public Open Space) below.

### 3 Mix of Tenures

- 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, the SHMA and the draft policies of the emerging Plans.

### 4 Design

- KCL have a good track record of delivering schemes with a high quality design and will work with both Council's to ensure a high standard of design.

### 4 Public Open Space and Pedestrian Accessibility to Surrounding Countryside

- Sensitive landscaping and accessible public open space for the benefit of new and existing residents will be a key feature of the proposed development and the scheme will be designed to help to deliver the 'green rim' walking and cycling route around Ipswich which will assist with access to Natural and Semi-Natural Green Space. The need for cross boundary working in order to achieve this objective is noted and supported.

- The site is capable of accommodating a larger area of open space coupled with smaller areas of open space, with the latter being integrated within the development. The locations and quantum of open space would be determined in due course, however the illustrative masterplan shows a fairly large area of open space to the north of the railway. The proposed development would be likely to result in the loss of pitches, however the area to the north of the railway line is capable of providing enhanced provision in an accessible location. The area shown is notional at this stage and there is flexibility in terms of the overall size and location of open space provision. It is noted that the plans for the Ipswich Garden Suburb also propose land for open space on land to the west of Tuddenham Road in connection with the proposed secondary school and that this open space is also proposed for use by the community. Any proposals for open space would seek to complement the proposed open space provided as part of the Garden Suburb.

- The Ipswich draft Local Plan identifies Green corridor DM10-D as between the cemetery, playing fields at Tuddenham Road and adjacent countryside. Consideration will be given to the provision of a green link through the development to link the existing elements of the green corridor with the wider countryside and enhancing access to the countryside. In addition, 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.

#### 5 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) with services including a convenience store, post office, hairdressers, bakers and public house and additional facilities proposed at the Ipswich Garden Suburb.

- Both Ipswich town centre and Heath Road Hospital are easily accessed by public transport from the site. The latter is a strategic health facility serving Ipswich and the surrounding area and is a major employer within the town.

- The development of this site promotes sustainable transport in accordance with paragraph 108 of the NPPF as:

o 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.

o 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.

o As far as we are aware, SCC Highways have not expressed any objections to the proposal to allocate development in this area.

o 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.

- The proposals will not influence the Ipswich northern bypass route. Even the inner-most option for the bypass indicates a route to the north of the railway line and therefore, the proposed development will have no impact on the proposed bypass or vice versa.

## 6 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 site is located within a Source Protection one and therefore it will be necessary to treat surface water prior to disposal.

- 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.

## 7 Landscape Impact and Ecology

- The Settlement Sensitivity Assessment (2018) identifies that there are opportunities within this area to "soften and integrate the existing urban edge and wider landscape through select urban development in association with the creation of green corridors penetrating the urban fabric of Ipswich". When assessing this area the report states that it "is less sensitive to residential and commercial development where it is associated with new woodland planting".

- It is proposed that any development would seek to protect the rural character of the lanes and seek to protect the network of hedges and

trees with any future expansion in accordance with the findings of the SCDC Landscape Character Area Assessment (2018).

- There are no known features of ecological or geological importance on or adjacent to the site. Relevant biodiversity studies would be undertaken at the appropriate time; however it is relevant to note that IBC identifies the part of the site falling within their boundary as having low conservation value (rank 5-6 as shown on plan 5 of Appendix 1 entitled the Ipswich Ecological Network).

#### 8 Archaeology

- The archaeological potential of the site will be explored as part of any planning application.

#### 8 Viability

- There are no known abnormal costs that could affect the viability of the site.
- It is proposed that an appropriate Section 106 package will be provided including anticipated contributions towards healthcare provision, expansion of Foxhall recycling centre, contributions towards libraries as identified in the SCDC draft Local Plan.

#### 10 Deliverability and Timescales

- 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.
- The part of the representation site falling within IBC should be allocated for development rather than being identified as a broad location. This approach would echo the approach taken by SCDC in their draft policy SCLP12.18.
- This site is currently proposed for development post 2031, however we submit that development could come forward sooner. It is envisaged that the site could come forward towards the end of the five year period or during the 5 to 10 year period and would take around five years to complete.
- The draft plans identify that development at Humber Doucy Lane should follow the delivery of the Ipswich Garden Suburb and enable it to become established and that it will enable the infrastructure for the primary school to be delivered. However, the Garden Suburb is currently programmed to be delivered throughout the Plan period and therefore this development could come forward sooner. It is proposed that development of land at Humber Doucy Lane should come forward once both Councils are satisfied that the proposed development helps meet the required housing numbers.

	<p>This policy as currently drafted should be amended to reflect the joint decision by both Suffolk Coastal and Ipswich Borough Council to identify land at Humber Doucy Lane for development within the Plan period.</p> <p>Please see attached sheet.</p>
<p><b>Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound</b></p>	<p>In order to make the Plan sound, it is proposed that Policy SCLP3.1 is amended to insert an additional bullet point within the second half of the policy, shown below underlined as point g, with renumbering of subsequent points:</p> <p>"...The strategy for growth will seek to provide opportunities for economic growth and create and enhance sustainable and inclusive communities through:</p> <p>f) The delivery of new Garden Neighbourhoods at North Felixstowe and South Saxmundham;</p> <p><u>g) The delivery of a cross boundary urban extension to Ipswich at Humber Doucy Lane;</u></p> <p>h) Utilising opportunities provided by road and rail corridors, including a focus on growth in the A12 and the A14 corridors;</p> <p>i) New strategic employment allocations based around key transport corridors, including to support the Port of Felixstowe;</p> <p>j) Strategies for market towns which seek to reflect and strengthen their roles and economies;</p> <p>k) Appropriate growth in rural areas that will help to support and sustain existing communities."</p> <p>Please see attached sheet.</p>
<p><b>Attached documents</b></p>	<p>Draft Masterplan 01.pdf (4.7 MB)</p>
<p><b>If your representation is seeking a change, do you consider it necessary to participate in the public examination?</b></p>	<p>Yes, I wish to participate at the oral examination</p>
<p><b>If you wish to participate in the public examination, please outline why you consider it to be necessary:</b></p>	<p>To enable the issues raised in our submissions to be discussed in detail and fully understood by the Inspector.</p>
<p><b>Being kept informed</b></p>	<p>Yes, I would like to be kept informed</p>

### Table 3.4 - Summary of policy approach for Settlement Hierarchy

Rep ID 1166

<b>Organisation Name</b>	The Kesgrave Covenant Ltd
<b>First Name</b>	
<b>Surname</b>	Sir/Madam
<b>Agent Organisation</b>	Phase 2 Planning & Development Limited
<b>Agent First Name</b>	Emma
<b>Agent Surname</b>	Walker
<b>Do you consider that this part of the Plan meets the legal and procedural requirements?</b>	Yes
<b>Do you consider this part of the Plan has met the tests of soundness?</b>	No
<b>Do you consider this part of the Plan to be unsound because it is not:</b>	Positively prepared Justified Effective
<b>Details of Representation</b>	<p>This representation is made by Phase 2 Planning and Development Ltd on behalf of the Kesgrave Covenant Ltd in relation to table 3.4 which is listed under paragraph 3.46.</p> <p>Whilst we strongly support the inclusion of land within our client's control at Humber Doucy Lane, Ipswich for development, we object to this table, which, as currently drafted, does not include reference to the delivery of cross-boundary housing on the edge of Ipswich, despite the identification of land at Humber Doucy Lane within both the draft Plans.</p> <p>Our clients, The Kesgrave Covenant Ltd (KCL) control land to the north of Humber Doucy Lane, Ipswich as shown on the attached masterplan (drawing reference C13089/01). This land has now been identified by Ipswich Borough Council (IBC) and Suffolk Coastal District Council (SCDC) for development towards the end of the Plan period. KCL support the inclusion of this site for development and are keen to work with both Councils to agree the extent of development and associated land uses.</p> <p>The attached masterplan has been designed to show how the land within KCL's control can 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:</p> <p><u>1 Delivery in a Sustainable Location</u></p> <ul style="list-style-type: none"> <li>• The site is well located, adjoining the existing built up area of Ipswich and has good public transport access and also a range of services and facilities within the vicinity of the site. The representation site also lies in relatively close proximity to the proposed Ipswich Garden Suburb, which will provide a range of local facilities and services. Further details in</li> </ul>

relation to the accessibility of the site are set out later in this representations.

- The identification of this site follows its identification as potentially suitable within both IBC and SCDCs SHELAAAs (refs: IP184c, IP303, IP344 and IP350 (Ipswich) and 1083 (Suffolk Coastal) respectively). The capacity estimates for the site accord with our initial estimates (i.e. approximately 375 within IBC's boundary and 150 within SCDC area).

## 2 Mix of Uses including Education Provision

- 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. It is also relevant to note that there are a range of services and facilities in the vicinity of the site and this will be further enhanced by the development of the Ipswich Garden Suburb to the west of the site providing the residents of the scheme with good access to a range of local services and facilities. The provision of non-residential uses would be subject to discussion and agreement with the local planning authorities.

- 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 early years facility.

- It is proposed that contributions would be made towards additional primary and secondary school places as part of the development. It is noted that contributions may be used towards the provision of additional spaces at the Ipswich Garden Suburb. We had previously suggested that a primary school could be provided as part of the development at Humber Doucy Lane. Given the relatively early stages of the Ipswich Garden Suburb, there is merit in ensuring that the new schools have sufficient capacity to accommodate the requirement for additional school places generated by the proposed development at Humber Doucy Lane. We had previously suggested the inclusion of a primary school within the representation site, and whilst there is flexibility to provide this, if necessary, we will be guided by Suffolk County Council.

- With regard to timescales for secondary school provision, the Ipswich draft Plan identifies at table 8B that a 1,200 space secondary school would be provided as part of the Ipswich Garden Suburb development on the eastern side within the Red House Neighbourhood. The adopted SPD (2017) states based on pupil forecasts from SCC a secondary school would be needed by 2021 and that the Infrastructure Delivery Plan will need to secure the delivery of the school no later than 2021, unless it is demonstrated that project delivery, phasing and other mitigation suggests an alternative timetable would be more appropriate.

- KCL seek to work with SCC to ensure that primary school provision, whether at the Ipswich Garden Suburb or on the representation site, can

be provided to enable earlier delivery of development. The three neighbourhoods of Ipswich Garden Suburb will each provide a primary school. The SPD identifies that a primary school will be co-located with the secondary school in the Red House Neighbourhood along with two primary schools in the two other neighbourhoods. Whilst there is no information publically available in relation to timescales for delivery of these schools, they will need to be delivered at a pace that reflects the new housing development in the area and therefore the need to hold back development at Humber Doucy Lane until 2031 due to primary school capacity is questioned.

- It is noted that SCDC have identified that the site should incorporate 0.1ha land to be provided within the masterplan area for early years provision, with an additional contribution to be provided to provide additional spaces at Winesham. This approach is endorsed.
- The draft masterplan shows land to the north of the railway for open space, including sports pitches. Further details are provided in section 4 (Public Open Space) below.

### 3 Mix of Tenures

- 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, the SHMA and the draft policies of the emerging Plans.

### 4 Design

- KCL have a good track record of delivering schemes with a high quality design and will work with both Council's to ensure a high standard of design.

### 4 Public Open Space and Pedestrian Accessibility to Surrounding Countryside

- Sensitive landscaping and accessible public open space for the benefit of new and existing residents will be a key feature of the proposed development and the scheme will be designed to help to deliver the 'green rim' walking and cycling route around Ipswich which will assist with access to Natural and Semi-Natural Green Space. The need for cross boundary working in order to achieve this objective is noted and supported.
- The site is capable of accommodating a larger area of open space coupled with smaller areas of open space, with the latter being integrated within the development. The locations and quantum of open space would be determined in due course, however the illustrative masterplan shows a fairly large area of open space to the north of the railway. The proposed development would be likely to result in the loss of pitches, however the area to the north of the railway line is capable of providing enhanced provision in an accessible location. The area shown is notional at this stage and there is flexibility in terms of the overall size and location of open space provision. It is noted that the plans for the Ipswich Garden

Suburb also propose land for open space on land to the west of Tuddenham Road in connection with the proposed secondary school and that this open space is also proposed for use by the community. Any proposals for open space would seek to complement the proposed open space provided as part of the Garden Suburb.

- The Ipswich draft Local Plan identifies Green corridor DM10-D as between the cemetery, playing fields at Tuddenham Road and adjacent countryside. Consideration will be given to the provision of a green link through the development to link the existing elements of the green corridor with the wider countryside and enhancing access to the countryside. In addition, 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.

## 5 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) with services including a convenience store, post office, hairdressers, bakers and public house and additional facilities proposed at the Ipswich Garden Suburb.
- Both Ipswich town centre and Heath Road Hospital are easily accessed by public transport from the site. The latter is a strategic health facility serving Ipswich and the surrounding area and is a major employer within the town.
- The development of this site promotes sustainable transport in accordance with paragraph 108 of the NPPF as:
  - o 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.
  - o 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.
  - o As far as we are aware, SCC Highways have not expressed any objections to the proposal to allocate development in this area.

o 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.
- The proposals will not influence the Ipswich northern bypass route. Even the inner-most option for the bypass indicates a route to the north of the railway line and therefore, the proposed development will have no impact on the proposed bypass or vice versa.

#### 6 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 site is located within a Source Protection one and therefore it will be necessary to treat surface water prior to disposal.
- 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.

#### 7 Landscape Impact and Ecology

- The Settlement Sensitivity Assessment (2018) identifies that there are opportunities within this area to "soften and integrate the existing urban edge and wider landscape through select urban development in association with the creation of green corridors penetrating the urban fabric of Ipswich". When assessing this area the report states that it "is less sensitive to residential and commercial development where it is associated with new woodland planting".
- It is proposed that any development would seek to protect the rural character of the lanes and seek to protect the network of hedges and trees with any future expansion in accordance with the findings of the SCDC Landscape Character Area Assessment (2018).
- There are no known features of ecological or geological importance on or adjacent to the site. Relevant biodiversity studies would be undertaken at the appropriate time; however it is relevant to note that IBC identifies the part of the site falling within their boundary as having low conservation value (rank 5-6 as shown on plan 5 of Appendix 1 entitled the Ipswich Ecological Network).

#### 8 Archaeology

- The archaeological potential of the site will be explored as part of any planning application.

#### 8 Viability

- There are no known abnormal costs that could affect the viability of the site.
- It is proposed that an appropriate Section 106 package will be provided including anticipated contributions towards healthcare provision, expansion of Foxhall recycling centre, contributions towards libraries as identified in the SCDC draft Local Plan.

#### 10 Deliverability and Timescales

- 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.
- The part of the representation site falling within IBC should be allocated for development rather than being identified as a broad location. This approach would echo the approach taken by SCDC in their draft policy SCLP12.18.
- This site is currently proposed for development post 2031, however we submit that development could come forward sooner. It is envisaged that the site could come forward towards the end of the five year period or during the 5 to 10 year period and would take around five years to complete.
- The draft plans identify that development at Humber Doucy Lane should follow the delivery of the Ipswich Garden Suburb and enable it to become established and that it will enable the infrastructure for the primary school to be delivered. However, the Garden Suburb is currently programmed to be delivered throughout the Plan period and therefore this development could come forward sooner. It is proposed that development of land at Humber Doucy Lane should come forward once both Councils are satisfied that the proposed development helps meet the required housing numbers.

As currently drafted, this table 3.4 does not include reference to the proposed housing development at Humber Doucy Lane. This is inconsistent with other parts of the Plan (such as policy SCLP21.24) and is neither justified nor effective, in the context of soundness.

Please see attached sheet.

**Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound**

In order to make the Plan sound, it is proposed that this policy is amended to include land at Humber Doucy Lane, Ipswich for housing development in accordance with the draft allocation at Policy SCLP12.24. It is proposed that the policy is amended as follows, with inserted text shown underlined:

	Category of	Summary of Policy Approach
	<b>Settlement Hierarchy</b>	
	<b>Major Centres</b>	.....
		<b>Housing</b>
		New strategic mixed use allocation at North Felixstowe Garden Neighbourhood (SCLP12.3)
		<u>Housing development at Humber Doucy Lane, Ipswich (SCLP12.24)</u>
		Housing development at Brightwell Lakes (SCLP12.19)
		Housing development at the Police Headquarters, Martlesham Heath (SCLP12.25)
		Housing development within Settlement Boundaries (SCLP3.3)
<b>Attached documents</b>	Draft Masterplan 01.pdf (4.7 MB)	
<b>If your representation is seeking a change, do you consider it necessary to participate in the public examination?</b>	Yes, I wish to participate at the oral examination	
<b>If you wish to participate in the public examination, please outline why you consider it to be necessary:</b>	To enable the issues raised in our submissions to be discussed in detail and fully understood by the Inspector.	
<b>Being kept informed</b>	Yes, I would like to be kept informed	

## Policy SCLP8.2: Open Space

<b>Rep ID</b>	1167
<b>Organisation Name</b>	The Kesgrave Covenant Ltd
<b>First Name</b>	
<b>Surname</b>	Sir/Madam
<b>Agent Organisation</b>	Phase 2 Planning & Development Limited
<b>Agent First Name</b>	Emma
<b>Agent Surname</b>	Walker
<b>Do you consider that this part of the Plan meets the legal and procedural requirements?</b>	Yes

<b>Do you consider this part of the Plan has met the tests of soundness?</b>	No
<b>Do you consider this part of the Plan to be unsound because it is not:</b>	Positively prepared Justified Effective
<b>Details of Representation</b>	<p>This representation is made by Phase 2 Planning and Development Ltd on behalf of the Kesgrave Covenant Ltd in relation to Policy SCLP8.2.</p> <p>This policy requires the replacement of an open space facility in a location that is equally or more accessible to the community. We object to the wording of this policy and submit that the policy should require the new facility to be in a location well related to the users of the existing facility.</p> <p>Our clients, The Kesgrave Covenant Ltd (KCL) control land to the north of Humber Doucy Lane, Ipswich as shown on the attached masterplan (drawing reference C13089/01). This land has now been identified by Ipswich Borough Council (IBC) and Suffolk Coastal District Council (SCDC) for development towards the end of the Plan period. KCL support the inclusion of this site for development and are keen to work with both Councils to agree the extent of development and associated land uses.</p> <p>It is proposed that as part of the development, playing pitches could be relocated to a larger site immediately to the north of the railway, as shown on the attached illustrative masterplan. This would result in the provision of an enhanced facility in an accessible location. The policy as currently drafted may restrict the relocation of the open space despite the proposed location being well located to the users of the existing facility. It is suggested that the policy is reworded to provide greater flexibility and echo draft Policy DM5 contained within the Ipswich Core Strategy and Policies DPD Review Preferred Options document.</p> <p>It should be noted that the area shown for open space on the illustrative masterplan is notional at this stage and there is flexibility in terms of the overall size and location of open space provision. It is noted that the plans for the Ipswich Garden Suburb also propose land for open space on land to the west of Tuddenham Road in connection with the proposed secondary school and that this open space is also proposed for use by the community. Any proposals for open space would seek to complement the proposed open space provided as part of the Garden Suburb.</p> <p>The policy as currently drafted is overly restrictive and does not reflect the approach taken by a neighbouring authority (Ipswich). Minor alterations are proposed to the wording of the policy to ensure that the two authorities are taking the same approach with this issue which in some cases will be a cross boundary matter.</p>

	Please see attached sheet.
<b>Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound</b>	<p>In order to make the Plan sound, it is proposed that this policy is amended as follows with addition text to be inserted shown as underlined and text to be removed shown as struck through.</p> <p>"...Proposals for development that results in the loss of open spaces will only be permitted in exceptional circumstances where:</p> <p>a) The proposal is ancillary to the open nature of the area and will enhance local character, increase local amenity and be of greater community or wildlife benefit,</p> <p>b) An open space assessment demonstrates the site is surplus to requirements including its ability to be used for alternative open space uses;</p> <p>Or</p> <p>c) The loss resulting from the proposed development will be replaced by equivalent or improved provision in terms of quantity, quality and in a location that is <u>well related to the users of the existing facility.</u> <del>equally or more accessible to the community in a timely manner."</del></p> <p>Please see attached sheet.</p>
<b>Attached documents</b>	Draft Masterplan 01.pdf (4.7 MB)
<b>If your representation is seeking a change, do you consider it necessary to participate in the public examination?</b>	Yes, I wish to participate at the oral examination
<b>If you wish to participate in the public examination, please outline why you consider it to be necessary:</b>	To enable the issues raised in our submissions to be discussed in detail and fully understood by the Inspector.
<b>Being kept informed</b>	Yes, I would like to be kept informed

### Policy SCLP12.18: Strategy for Communities surrounding Ipswich

<b>Rep ID</b>	1168
<b>Organisation Name</b>	The Kesgrave Covenant Ltd
<b>First Name</b>	
<b>Surname</b>	Sir/Madam
<b>Agent Organisation</b>	Phase 2 Planning & Development Limited
<b>Agent First Name</b>	Emma
<b>Agent Surname</b>	Walker

<b>Do you consider that this part of the Plan meets the legal and procedural requirements?</b>	Yes
<b>Do you consider this part of the Plan has met the tests of soundness?</b>	No
<b>Do you consider this part of the Plan to be unsound because it is not:</b>	Positively prepared Justified Effective
<b>Details of Representation</b>	<p>This representation is made by Phase 2 Planning and Development Ltd on behalf of the Kesgrave Covenant Ltd in relation to Policy SCLP12.18.</p> <p>Whilst we generally support this policy which identifies land within our client's control for development, we object to the post 2031 timescales for delivery of this land at Humber Doucy Lane. Development should be able to come forward earlier if required.</p> <p>Our clients, The Kesgrave Covenant Ltd (KCL) control land to the north of Humber Doucy Lane, Ipswich as shown on the attached masterplan (drawing reference C13089/01). This land has now been identified by Ipswich Borough Council (IBC) and Suffolk Coastal District Council (SCDC) for development towards the end of the Plan period. KCL support the inclusion of this site for development and are keen to work with both Councils to agree the extent of development and associated land uses.</p> <p>The attached masterplan has been designed to show how the land within KCL's control can 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:</p> <p><b>1 <u>Delivery in a Sustainable Location</u></b></p> <ul style="list-style-type: none"> <li>• The site is well located, adjoining the existing built up area of Ipswich and has good public transport access and also a range of services and facilities within the vicinity of the site. The representation site also lies in relatively close proximity to the proposed Ipswich Garden Suburb, which will provide a range of local facilities and services. Further details in relation to the accessibility of the site are set out later in this representations.</li> <li>• The identification of this site follows its identification as potentially suitable within both IBC and SCDCs SHELAAs (refs: IP184c, IP303, IP344 and IP350 (Ipswich) and 1083 (Suffolk Coastal) respectively). The capacity estimates for the site accord with our initial estimates (i.e. approximately 375 within IBC's boundary and 150 within SCDC area).</li> </ul>

## 2 Mix of Uses including Education Provision

- 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. It is also relevant to note that there are a range of services and facilities in the vicinity of the site and this will be further enhanced by the development of the Ipswich Garden Suburb to the west of the site providing the residents of the scheme with good access to a range of local services and facilities. The provision of non-residential uses would be subject to discussion and agreement with the local planning authorities.

- 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 early years facility.

- It is proposed that contributions would be made towards additional primary and secondary school places as part of the development. It is noted that contributions may be used towards the provision of additional spaces at the Ipswich Garden Suburb. We had previously suggested that a primary school could be provided as part of the development at Humber Doucy Lane. Given the relatively early stages of the Ipswich Garden Suburb, there is merit in ensuring that the new schools have sufficient capacity to accommodate the requirement for additional school places generated by the proposed development at Humber Doucy Lane. We had previously suggested the inclusion of a primary school within the representation site, and whilst there is flexibility to provide this, if necessary, we will be guided by Suffolk County Council.

- With regard to timescales for secondary school provision, the Ipswich draft Plan identifies at table 8B that a 1,200 space secondary school would be provided as part of the Ipswich Garden Suburb development on the eastern side within the Red House Neighbourhood. The adopted SPD (2017) states based on pupil forecasts from SCC a secondary school would be needed by 2021 and that the Infrastructure Delivery Plan will need to secure the delivery of the school no later than 2021, unless it is demonstrated that project delivery, phasing and other mitigation suggests an alternative timetable would be more appropriate.

- KCL seek to work with SCC to ensure that primary school provision, whether at the Ipswich Garden Suburb or on the representation site, can be provided to enable earlier delivery of development. The three neighbourhoods of Ipswich Garden Suburb will each provide a primary school. The SPD identifies that a primary school will be co-located with the secondary school in the Red House Neighbourhood along with two primary schools in the two other neighbourhoods. Whilst there is no information publically available in relation to timescales for delivery of

these schools, they will need to be delivered at a pace that reflects the new housing development in the area and therefore the need to hold back development at Humber Doucy Lane until 2031 due to primary school capacity is questioned.

- It is noted that SCDC have identified that the site should incorporate 0.1ha land to be provided within the masterplan area for early years provision, with an additional contribution to be provided to provide additional spaces at Witnesham. This approach is endorsed.
- The draft masterplan shows land to the north of the railway for open space, including sports pitches. Further details are provided in section 4 (Public Open Space) below.

### 3 Mix of Tenures

- 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, the SHMA and the draft policies of the emerging Plans.

### 4 Design

- KCL have a good track record of delivering schemes with a high quality design and will work with both Council's to ensure a high standard of design.

### 4 Public Open Space and Pedestrian Accessibility to Surrounding Countryside

- Sensitive landscaping and accessible public open space for the benefit of new and existing residents will be a key feature of the proposed development and the scheme will be designed to help to deliver the 'green rim' walking and cycling route around Ipswich which will assist with access to Natural and Semi-Natural Green Space. The need for cross boundary working in order to achieve this objective is noted and supported.
- The site is capable of accommodating a larger area of open space coupled with smaller areas of open space, with the latter being integrated within the development. The locations and quantum of open space would be determined in due course, however the illustrative masterplan shows a fairly large area of open space to the north of the railway. The proposed development would be likely to result in the loss of pitches, however the area to the north of the railway line is capable of providing enhanced provision in an accessible location. The area shown is notional at this stage and there is flexibility in terms of the overall size and location of open space provision. It is noted that the plans for the Ipswich Garden Suburb also propose land for open space on land to the west of Tuddenham Road in connection with the proposed secondary school and that this open space is also proposed for use by the community. Any proposals for open space

would seek to complement the proposed open space provided as part of the Garden Suburb.

- The Ipswich draft Local Plan identifies Green corridor DM10-D as between the cemetery, playing fields at Tuddenham Road and adjacent countryside. Consideration will be given to the provision of a green link through the development to link the existing elements of the green corridor with the wider countryside and enhancing access to the countryside. In addition, 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.

## 5 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) with services including a convenience store, post office, hairdressers, bakers and public house and additional facilities proposed at the Ipswich Garden Suburb.
- Both Ipswich town centre and Heath Road Hospital are easily accessed by public transport from the site. The latter is a strategic health facility serving Ipswich and the surrounding area and is a major employer within the town.
- The development of this site promotes sustainable transport in accordance with paragraph 108 of the NPPF as:
  - o 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.
  - o 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.
  - o As far as we are aware, SCC Highways have not expressed any objections to the proposal to allocate development in this area.
  - o 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.
- The proposals will not influence the Ipswich northern bypass route. Even the inner-most option for the bypass indicates a route to the north of the railway line and therefore, the proposed development will have no impact on the proposed bypass or vice versa.

#### 6 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 site is located within a Source Protection one and therefore it will be necessary to treat surface water prior to disposal.
- 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.

#### 7 Landscape Impact and Ecology

- The Settlement Sensitivity Assessment (2018) identifies that there are opportunities within this area to "soften and integrate the existing urban edge and wider landscape through select urban development in association with the creation of green corridors penetrating the urban fabric of Ipswich". When assessing this area the report states that it "is less sensitive to residential and commercial development where it is associated with new woodland planting".
- It is proposed that any development would seek to protect the rural character of the lanes and seek to protect the network of hedges and trees with any future expansion in accordance with the findings of the SCDC Landscape Character Area Assessment (2018).
- There are no known features of ecological or geological importance on or adjacent to the site. Relevant biodiversity studies would be undertaken at the appropriate time; however it is relevant to note that IBC identifies the part of the site falling within their boundary as having low conservation value (rank 5-6 as shown on plan 5 of Appendix 1 entitled the Ipswich Ecological Network).

#### 8 Archaeology

- The archaeological potential of the site will be explored as part of any planning application.

## 8 Viability

- There are no known abnormal costs that could affect the viability of the site.
- It is proposed that an appropriate Section 106 package will be provided including anticipated contributions towards healthcare provision, expansion of Foxhall recycling centre, contributions towards libraries as identified in the SCDC draft Local Plan.

## 10 Deliverability and Timescales

- 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.
- The part of the representation site falling within IBC should be allocated for development rather than being identified as a broad location. This approach would echo the approach taken by SCDC in their draft policy SCLP12.18.
- This site is currently proposed for development post 2031, however we submit that development could come forward sooner. It is envisaged that the site could come forward towards the end of the five year period or during the 5 to 10 year period and would take around five years to complete.
- The draft plans identify that development at Humber Doucy Lane should follow the delivery of the Ipswich Garden Suburb and enable it to become established and that it will enable the infrastructure for the primary school to be delivered. However, the Garden Suburb is currently programmed to be delivered throughout the Plan period and therefore this development could come forward sooner. It is proposed that development of land at Humber Doucy Lane should come forward once both Councils are satisfied that the proposed development helps meet the required housing numbers.

This policy, as currently drafted, restricts development at Humber Doucy Lane to the latter part of the Plan period. Greater flexibility should be provided should be provided within the Policy to enable this site to come forward sooner should it be required.

Please see attached sheet.

**Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound**

In order to make the Plan sound, it is proposed that this policy is amended as follows with the words to be deleted shown as struck through:

"...Residential developments will be limited to the proposal at Brightwell Lakes, land at Humber Doucy Lane to come forward beyond 2031 alongside land in Ipswich Borough, the provision of housing in association with redevelopment of the Police Headquarters site and

	development within the Settlement Boundaries consisting of infill or small scale redevelopments which make the most appropriate use of previously developed land, plus small allocations or development identified through Neighbourhood Plans."
	Please see attached sheet.
<b>Attached documents</b>	Draft Masterplan 01.pdf (4.7 MB)
<b>If your representation is seeking a change, do you consider it necessary to participate in the public examination?</b>	Yes, I wish to participate at the oral examination
<b>If you wish to participate in the public examination, please outline why you consider it to be necessary:</b>	To enable the issues raised in our submissions to be discussed in detail and fully understood by the Inspector.
<b>Being kept informed</b>	Yes, I would like to be kept informed

### Policy SCLP12.24: Land at Humber Doucy Lane

<b>Rep ID</b>	1170
<b>Organisation Name</b>	The Kesgrave Covenant Ltd
<b>First Name</b>	
<b>Surname</b>	Sir/Madam
<b>Agent Organisation</b>	Phase 2 Planning & Development Limited
<b>Agent First Name</b>	Emma
<b>Agent Surname</b>	Walker
<b>Do you consider that this part of the Plan meets the legal and procedural requirements?</b>	Yes
<b>Do you consider this part of the Plan has met the tests of soundness?</b>	
<b>Do you consider this part of the Plan to be unsound because it is not:</b>	Positively prepared Justified Effective
<b>Details of Representation</b>	<p>This representation is made by Phase 2 Planning and Development Ltd on behalf of the Kesgrave Covenant Ltd in relation to Policy SCLP12.24.</p> <p>Whilst we strongly support the inclusion of this land which falls within our client's control for development, we object to the timescales for development, which, as currently drafted, limit development to post</p>

2031. Development in this location could come forward earlier if required.

Our clients, The Kesgrave Covenant Ltd (KCL) control land to the north of Humber Doucy Lane, Ipswich as shown on the attached masterplan (drawing reference C13089/01). This land has now been identified by Ipswich Borough Council (IBC) and Suffolk Coastal District Council (SCDC) for development towards the end of the Plan period. KCL support the inclusion of this site for development and are keen to work with both Councils to agree the extent of development and associated land uses.

The attached masterplan has been designed to show how the land within KCL's control can 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

- The site is well located, adjoining the existing built up area of Ipswich and has good public transport access and also a range of services and facilities within the vicinity of the site. The representation site also lies in relatively close proximity to the proposed Ipswich Garden Suburb, which will provide a range of local facilities and services. Further details in relation to the accessibility of the site are set out later in this representations.
- The identification of this site follows its identification as potentially suitable within both IBC and SCDCs SHELAAs (refs: IP184c, IP303, IP344 and IP350 (Ipswich) and 1083 (Suffolk Coastal) respectively). The capacity estimates for the site accord with our initial estimates (i.e. approximately 375 within IBC's boundary and 150 within SCDC area).

#### 2 Mix of Uses including Education Provision

- 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. It is also relevant to note that there are a range of services and facilities in the vicinity of the site and this will be further enhanced by the development of the Ipswich Garden Suburb to the west of the site providing the residents of the scheme with good access to a range of local services and facilities. The provision of non-residential uses would be subject to discussion and agreement with the local planning authorities.
- 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 early years facility.

- It is proposed that contributions would be made towards additional primary and secondary school places as part of the development. It is noted that contributions may be used towards the provision of additional spaces at the Ipswich Garden Suburb. We had previously suggested that a primary school could be provided as part of the development at Humber Doucy Lane. Given the relatively early stages of the Ipswich Garden Suburb, there is merit in ensuring that the new schools have sufficient capacity to accommodate the requirement for additional school places generated by the proposed development at Humber Doucy Lane. We had previously suggested the inclusion of a primary school within the representation site, and whilst there is flexibility to provide this, if necessary, we will be guided by Suffolk County Council.
- With regard to timescales for secondary school provision, the Ipswich draft Plan identifies at table 8B that a 1,200 space secondary school would be provided as part of the Ipswich Garden Suburb development on the eastern side within the Red House Neighbourhood. The adopted SPD (2017) states based on pupil forecasts from SCC a secondary school would be needed by 2021 and that the Infrastructure Delivery Plan will need to secure the delivery of the school no later than 2021, unless it is demonstrated that project delivery, phasing and other mitigation suggests an alternative timetable would be more appropriate.
- KCL seek to work with SCC to ensure that primary school provision, whether at the Ipswich Garden Suburb or on the representation site, can be provided to enable earlier delivery of development. The three neighbourhoods of Ipswich Garden Suburb will each provide a primary school. The SPD identifies that a primary school will be co-located with the secondary school in the Red House Neighbourhood along with two primary schools in the two other neighbourhoods. Whilst there is no information publically available in relation to timescales for delivery of these schools, they will need to be delivered at a pace that reflects the new housing development in the area and therefore the need to hold back development at Humber Doucy Lane until 2031 due to primary school capacity is questioned.
- It is noted that SCDC have identified that the site should incorporate 0.1ha land to be provided within the masterplan area for early years provision, with an additional contribution to be provided to provide additional spaces at Witnesham. This approach is endorsed.
- The draft masterplan shows land to the north of the railway for open space, including sports pitches. Further details are provided in section 4 (Public Open Space) below.

### 3 Mix of Tenures

- 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, the SHMA and the draft policies of the emerging Plans.

#### 4 Design

- KCL have a good track record of delivering schemes with a high quality design and will work with both Council's to ensure a high standard of design.

#### 4 Public Open Space and Pedestrian Accessibility to Surrounding Countryside

- Sensitive landscaping and accessible public open space for the benefit of new and existing residents will be a key feature of the proposed development and the scheme will be designed to help to deliver the 'green rim' walking and cycling route around Ipswich which will assist with access to Natural and Semi-Natural Green Space. The need for cross boundary working in order to achieve this objective is noted and supported.

- The site is capable of accommodating a larger area of open space coupled with smaller areas of open space, with the latter being integrated within the development. The locations and quantum of open space would be determined in due course, however the illustrative masterplan shows a fairly large area of open space to the north of the railway. The proposed development would be likely to result in the loss of pitches, however the area to the north of the railway line is capable of providing enhanced provision in an accessible location. The area shown is notional at this stage and there is flexibility in terms of the overall size and location of open space provision. It is noted that the plans for the Ipswich Garden Suburb also propose land for open space on land to the west of Tuddenham Road in connection with the proposed secondary school and that this open space is also proposed for use by the community. Any proposals for open space would seek to complement the proposed open space provided as part of the Garden Suburb.

- The Ipswich draft Local Plan identifies Green corridor DM10-D as between the cemetery, playing fields at Tuddenham Road and adjacent countryside. Consideration will be given to the provision of a green link through the development to link the existing elements of the green corridor with the wider countryside and enhancing access to the countryside. In addition, 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.

#### 5 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) with services including a convenience store, post office, hairdressers, bakers and public house and additional facilities proposed at the Ipswich Garden Suburb.

- Both Ipswich town centre and Heath Road Hospital are easily accessed by public transport from the site. The latter is a strategic health facility serving Ipswich and the surrounding area and is a major employer within the town.

- The development of this site promotes sustainable transport in accordance with paragraph 108 of the NPPF as:

- o 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.

- o 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.

- o As far as we are aware, SCC Highways have not expressed any objections to the proposal to allocate development in this area.

- o 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.

- The proposals will not influence the Ipswich northern bypass route. Even the inner-most option for the bypass indicates a route to the north of the railway line and therefore, the proposed development will have no impact on the proposed bypass or vice versa.

## 6 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 site is located within a Source Protection one and therefore it will be necessary to treat surface water prior to disposal.

- 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.

## 7 Landscape Impact and Ecology

- The Settlement Sensitivity Assessment (2018) identifies that there are opportunities within this area to "soften and integrate the existing urban edge and wider landscape through select urban development in association with the creation of green corridors penetrating the urban fabric of Ipswich". When assessing this area the report states that it "is less sensitive to residential and commercial development where it is associated with new woodland planting".

- It is proposed that any development would seek to protect the rural character of the lanes and seek to protect the network of hedges and trees with any future expansion in accordance with the findings of the SCDC Landscape Character Area Assessment (2018).

- There are no known features of ecological or geological importance on or adjacent to the site. Relevant biodiversity studies would be undertaken at the appropriate time; however it is relevant to note that IBC identifies the part of the site falling within their boundary as having low conservation value (rank 5-6 as shown on plan 5 of Appendix 1 entitled the Ipswich Ecological Network).

## 8 Archaeology

- The archaeological potential of the site will be explored as part of any planning application.

## 8 Viability

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

- It is proposed that an appropriate Section 106 package will be provided including anticipated contributions towards healthcare provision, expansion of Foxhall recycling centre, contributions towards libraries as identified in the SCDC draft Local Plan.

## 10 Deliverability and Timescales

- 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.
- The part of the representation site falling within IBC should be allocated for development rather than being identified as a broad

location. This approach would echo the approach taken by SCDC in their draft policy SCLP12.18.

- This site is currently proposed for development post 2031, however we submit that development could come forward sooner. It is envisaged that the site could come forward towards the end of the five year period or during the 5 to 10 year period and would take around five years to complete.

- The draft plans identify that development at Humber Doucy Lane should follow the delivery of the Ipswich Garden Suburb and enable it to become established and that it will enable the infrastructure for the primary school to be delivered. However, the Garden Suburb is currently programmed to be delivered throughout the Plan period and therefore this development could come forward sooner. It is proposed that development of land at Humber Doucy Lane should come forward once both Councils are satisfied that the proposed development helps meet the required housing numbers.

This policy, as currently drafted, restricts development at Humber Doucy Lane to the latter part of the Plan period. Greater flexibility should be provided should be provided within the Policy to enable this site to come forward sooner should it be required.

Please see attached sheet.

**Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound**

In order to make the Plan sound, it is proposed that this policy is amended by deleting the wording that is shown as struck through:

"9.9ha of land to the east of Humber Doucy Lane is identified to come forward for the development of approximately 150 dwellings ~~post 2031~~. Development will come forward as part of a master planned approach with land in Ipswich Borough.

Development will be expected to comply with the following criteria:

- a) Delivery of a high quality design incorporating a mix of housing types, including affordable housing on-site;
- b) A site-specific Flood Risk Assessment will be required;
- c) Provision of 0.1ha of land for an early years setting if needed within the part of the site in Suffolk Coastal District;
- d) Contribution to the creation of a 'green rim' around Ipswich and provision of on-site open space;
- e) Provision of a soft edge to the urban area through the provision of significant landscaping;
- f) Promotion of the use of sustainable modes of transport; and
- g) An archaeological assessment will be required.

	Development will be accessed via Humber Doucy Lane. A Transport Assessment will be required to identify any necessary improvements to highways and junctions on Humber Doucy Lane and Tuddenham Road."
<b>Attached documents</b>	Draft Masterplan 01.pdf (4.7 MB)
<b>If your representation is seeking a change, do you consider it necessary to participate in the public examination?</b>	Yes, I wish to participate at the oral examination
<b>If you wish to participate in the public examination, please outline why you consider it to be necessary:</b>	To enable the issues raised in our submissions to be discussed in detail and fully understood by the Inspector.
<b>Being kept informed</b>	Yes, I would like to be kept informed

### Policy SCLP12.68: Land South of Lower Road, Westerfield

<b>Rep ID</b>	1174
<b>Organisation Name</b>	The Kesgrave Covenant Ltd
<b>First Name</b>	
<b>Surname</b>	Sir/Madam
<b>Agent Organisation</b>	Phase 2 Planning & Development Limited
<b>Agent First Name</b>	Emma
<b>Agent Surname</b>	Walker
<b>Do you consider that this part of the Plan meets the legal and procedural requirements?</b>	Yes
<b>Do you consider this part of the Plan has met the tests of soundness?</b>	Yes
<b>Do you consider this part of the Plan to be unsound because it is not:</b>	
<b>Details of Representation</b>	<p>This representation is made by Phase 2 Planning and Development Ltd on behalf of the Kesgrave Covenant Ltd in relation to Policy SCLP12.68.</p> <p>The Kesgrave Covenant Ltd control this development site which is identified for residential development in the Site Allocations Development Plan Document (2017) under policy SSP17. We can confirm that progress has been made with the technical work required to bring this site forward and once an illustrative layout has</p>

	<p>been prepared, a pre-application meeting will be requested with the Council.</p> <p>Draft Policy SCLP12.68 is therefore supported.</p> <p>Please see attached sheet.</p>
<b>Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound</b>	
<b>Attached documents</b>	Draft Masterplan 01.pdf (4.7 MB)
<b>If your representation is seeking a change, do you consider it necessary to participate in the public examination?</b>	No, I do not wish to participate at the oral examination
<b>If you wish to participate in the public examination, please outline why you consider it to be necessary:</b>	
<b>Being kept informed</b>	Yes, I would like to be kept informed

## General Comment

<b>Rep ID</b>	1176
<b>Organisation Name</b>	The Kesgrave Covenant Ltd
<b>First Name</b>	
<b>Surname</b>	Sir/Madam
<b>Agent Organisation</b>	Phase 2 Planning & Development Limited
<b>Agent First Name</b>	Emma
<b>Agent Surname</b>	Walker
<b>Do you consider that this part of the Plan meets the legal and procedural requirements?</b>	Yes
<b>Do you consider this part of the Plan has met the tests of soundness?</b>	No
<b>Do you consider this part of the Plan to be unsound because it is not:</b>	Positively prepared Justified Effective

**Details of Representation**

This representation is made by Phase 2 Planning and Development Ltd on behalf of the Kesgrave Covenant Ltd in relation to the Policies Map.

Whilst we strongly support the inclusion of land within our client's control at Humber Doucy Lane, Ipswich for development, we object to the exclusion of this site from the Policies Map. This representation should be considered in conjunction with our other representations to the draft Plan, which seek to enable development in this location to come forward earlier than 2031, if required.

Our clients, The Kesgrave Covenant Ltd (KCL) control land to the north of Humber Doucy Lane, Ipswich as shown on the attached masterplan (drawing reference C13089/01). This land has now been identified by Ipswich Borough Council (IBC) and Suffolk Coastal District Council (SCDC) for development towards the end of the Plan period. KCL support the inclusion of this site for development and are keen to work with both Councils to agree the extent of development and associated land uses.

The attached masterplan has been designed to show how the land within KCL's control can 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

- The site is well located, adjoining the existing built up area of Ipswich and has good public transport access and also a range of services and facilities within the vicinity of the site. The representation site also lies in relatively close proximity to the proposed Ipswich Garden Suburb, which will provide a range of local facilities and services. Further details in relation to the accessibility of the site are set out later in this representations.
- The identification of this site follows its identification as potentially suitable within both IBC and SCDCs SHELAAs (refs: IP184c, IP303, IP344 and IP350 (Ipswich) and 1083 (Suffolk Coastal) respectively). The capacity estimates for the site accord with our initial estimates (i.e. approximately 375 within IBC's boundary and 150 within SCDC area).

#### 2 Mix of Uses including Education Provision

- 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. It is also relevant to note that there are a range of services and facilities in the vicinity of the site and this will be further enhanced by the development of the Ipswich Garden Suburb to the west of the site providing the residents of the scheme with good access to a range of local services and facilities. The provision of non-residential uses would be subject to discussion and agreement with the local planning authorities.

- 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 early years facility.

- It is proposed that contributions would be made towards additional primary and secondary school places as part of the development. It is noted that contributions may be used towards the provision of additional spaces at the Ipswich Garden Suburb. We had previously suggested that a primary school could be provided as part of the development at Humber Doucy Lane. Given the relatively early stages of the Ipswich Garden Suburb, there is merit in ensuring that the new schools have sufficient capacity to accommodate the requirement for additional school places generated by the proposed development at Humber Doucy Lane. We had previously suggested the inclusion of a primary school within the representation site, and whilst there is flexibility to provide this, if necessary, we will be guided by Suffolk County Council.

- With regard to timescales for secondary school provision, the Ipswich draft Plan identifies at table 8B that a 1,200 space secondary school would be provided as part of the Ipswich Garden Suburb development on the eastern side within the Red House Neighbourhood. The adopted SPD (2017) states based on pupil forecasts from SCC a secondary school would be needed by 2021 and that the Infrastructure Delivery Plan will need to secure the delivery of the school no later than 2021, unless it is demonstrated that project delivery, phasing and other mitigation suggests an alternative timetable would be more appropriate.

- KCL seek to work with SCC to ensure that primary school provision, whether at the Ipswich Garden Suburb or on the representation site, can be provided to enable earlier delivery of development. The three neighbourhoods of Ipswich Garden Suburb will each provide a primary school. The SPD identifies that a primary school will be co-located with the secondary school in the Red House Neighbourhood along with two primary schools in the two other neighbourhoods. Whilst there is no information publically available in relation to timescales for delivery of these schools, they will need to be delivered at a pace that reflects the new housing development in the area and therefore the need to hold back development at Humber Doucy Lane until 2031 due to primary school capacity is questioned.

- It is noted that SCDC have identified that the site should incorporate 0.1ha land to be provided within the masterplan area for early years provision, with an additional contribution to be provided to provide additional spaces at Witnesham. This approach is endorsed.

- The draft masterplan shows land to the north of the railway for open space, including sports pitches. Further details are provided in section 4 (Public Open Space) below.

### 3 Mix of Tenures

- 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, the SHMA and the draft policies of the emerging Plans.

### 4 Design

- KCL have a good track record of delivering schemes with a high quality design and will work with both Council's to ensure a high standard of design.

### 4 Public Open Space and Pedestrian Accessibility to Surrounding Countryside

- Sensitive landscaping and accessible public open space for the benefit of new and existing residents will be a key feature of the proposed development and the scheme will be designed to help to deliver the 'green rim' walking and cycling route around Ipswich which will assist with access to Natural and Semi-Natural Green Space. The need for cross boundary working in order to achieve this objective is noted and supported.

- The site is capable of accommodating a larger area of open space coupled with smaller areas of open space, with the latter being integrated within the development. The locations and quantum of open space would be determined in due course, however the illustrative masterplan shows a fairly large area of open space to the north of the railway. The proposed development would be likely to result in the loss of pitches, however the area to the north of the railway line is capable of providing enhanced provision in an accessible location. The area shown is notional at this stage and there is flexibility in terms of the overall size and location of open space provision. It is noted that the plans for the Ipswich Garden Suburb also propose land for open space on land to the west of Tuddenham Road in connection with the proposed secondary school and that this open space is also proposed for use by the community. Any proposals for open space would seek to complement the proposed open space provided as part of the Garden Suburb.

- The Ipswich draft Local Plan identifies Green corridor DM10-D as between the cemetery, playing fields at Tuddenham Road and adjacent countryside. Consideration will be given to the provision of a green link through the development to link the existing elements of the green corridor with the wider countryside and enhancing access to the countryside. In addition, 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.

## 5 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) with services including a convenience store, post office, hairdressers, bakers and public house and additional facilities proposed at the Ipswich Garden Suburb.
- Both Ipswich town centre and Heath Road Hospital are easily accessed by public transport from the site. The latter is a strategic health facility serving Ipswich and the surrounding area and is a major employer within the town.
- The development of this site promotes sustainable transport in accordance with paragraph 108 of the NPPF as:
  - o 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.
  - o 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.
  - o As far as we are aware, SCC Highways have not expressed any objections to the proposal to allocate development in this area.
  - o 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.
- The proposals will not influence the Ipswich northern bypass route. Even the inner-most option for the bypass indicates a route to the north of the railway line and therefore, the proposed development will have no impact on the proposed bypass or vice versa.

## 6 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 site is located within a Source Protection one and therefore it will be necessary to treat surface water prior to disposal.
- 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.

## 7 Landscape Impact and Ecology

- The Settlement Sensitivity Assessment (2018) identifies that there are opportunities within this area to "soften and integrate the existing urban edge and wider landscape through select urban development in association with the creation of green corridors penetrating the urban fabric of Ipswich". When assessing this area the report states that it "is less sensitive to residential and commercial development where it is associated with new woodland planting".
- It is proposed that any development would seek to protect the rural character of the lanes and seek to protect the network of hedges and trees with any future expansion in accordance with the findings of the SCDC Landscape Character Area Assessment (2018).
- There are no known features of ecological or geological importance on or adjacent to the site. Relevant biodiversity studies would be undertaken at the appropriate time; however it is relevant to note that IBC identifies the part of the site falling within their boundary as having low conservation value (rank 5-6 as shown on plan 5 of Appendix 1 entitled the Ipswich Ecological Network).

## 8 Archaeology

- The archaeological potential of the site will be explored as part of any planning application.

## 8 Viability

- There are no known abnormal costs that could affect the viability of the site.
- It is proposed that an appropriate Section 106 package will be provided including anticipated contributions towards healthcare provision, expansion of Foxhall recycling centre, contributions towards libraries as identified in the SCDC draft Local Plan.

## 10 Deliverability and Timescales

	<ul style="list-style-type: none"> <li>• 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.</li> <li>• The part of the representation site falling within IBC should be allocated for development rather than being identified as a broad location. This approach would echo the approach taken by SCDC in their draft policy SCLP12.18.</li> <li>• This site is currently proposed for development post 2031, however we submit that development could come forward sooner. It is envisaged that the site could come forward towards the end of the five year period or during the 5 to 10 year period and would take around five years to complete.</li> <li>• The draft plans identify that development at Humber Doucy Lane should follow the delivery of the Ipswich Garden Suburb and enable it to become established and that it will enable the infrastructure for the primary school to be delivered. However, the Garden Suburb is currently programmed to be delivered throughout the Plan period and therefore this development could come forward sooner. It is proposed that development of land at Humber Doucy Lane should come forward once both Councils are satisfied that the proposed development helps meet the required housing numbers.</li> </ul> <p>As currently drafted, the Plan fails to show the allocation under policy SCLP12.24 on the policies map and is therefore not effective or justified in the context of the tests of soundness. In order to rectify this, the policies map should be amended accordingly.</p> <p>Please see attached.</p>
<b>Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound</b>	<p>In order to make the Plan sound, it is proposed that the policies map should be amended to include the land falling within Suffolk Coastal District Council's boundary shown on the attached illustrative masterplan as an allocation for residential development in accordance with Policy SCLP12.24.</p> <p>Please see attached.</p>
<b>Attached documents</b>	Draft Masterplan 01.pdf (4.7 MB)
<b>If your representation is seeking a change, do you consider it necessary to participate in the public examination?</b>	Yes, I wish to participate at the oral examination
<b>If you wish to participate in the public examination, please outline why you consider it to be necessary:</b>	To enable the issues raised in our submissions to be discussed in detail and fully understood by the Inspector.



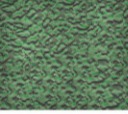

**Being kept informed**

Yes, I would like to be kept informed

**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