

# **Public Consultation Ipswich Local Plan Review Preferred Options**

**16<sup>th</sup> January – 13<sup>th</sup> March 2019**

**Town & Country Planning (Local Planning) (England) Regulations  
2012 (Regulation 18)**

## **Consultation Comments Form**



e-mail:


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Planning and Development  
Ipswich Borough Council  
Grafton House  
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Ipswich  
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Planning documents to which this comments form relates:	<b>Ipswich Local Plan Review Preferred Options</b>
Please return this comments form to:	<a href="mailto:planningpolicy@ipswich.gov.uk">planningpolicy@ipswich.gov.uk</a> or Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	<b>11.45pm Wednesday 13<sup>th</sup> March 2019</b>
This form has two parts:	Part A – Personal details
	Part B – Your comment(s).

<b>PART A PERSONAL DETAILS</b>		
	1. Personal details	2. Agent's details (if applicable)
Title		Mrs
First name		Emma
Last name		Walker
Job title ( <i>where relevant</i> )		Associate
Organisation ( <i>where relevant</i> )	The Kesgrave Covenant Ltd	Phase 2 Planning and Development Ltd
Address <i>Please include post code</i>	Philip House St William Court Kesgrave Suffolk IP5 2QP	250 Avenue West Skyline 120 Great Notley Braintree CM77 7AA
E-mail		
Telephone No.		
<p><b>Signature:</b> .....  ..... <b>Date:</b> .....<b>21<sup>st</sup> February 2019</b>.....</p>		
<p>For individuals only (not applicable to organisations), we would like to add your contact details to the Local Plan Review consultation database so that we can contact you in the future regarding planning matters. <b>Please put a tick in the box if you consent to us holding your details.</b></p>		
<div style="text-align: right;"> <input checked="" type="checkbox"/> </div>		

## PART B Comments about the Ipswich Local Plan Review Preferred Options

Your name or organisation ( <i>and client if you are an agent</i> ):	Emma Walker of Phase 2 Planning and Development Ltd on behalf of The Kesgrave Covenant Ltd
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**Please comment on any or all of the sections, chapters or sites in the Ipswich Local Plan Review Preferred Options documents and specify which sections, chapters or site(s) you are commenting upon.**

<b>Section/Chapter or Site reference:</b>	<b>Comment</b> (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)
Key Diagram (page 24 of the Core Strategy and Policies Development Plan)	In summary, we support the inclusion of land within our client's control at Humber Doucy Lane for inclusion within the Core Strategy. As set out in the attached more detailed representation, this is a sustainably located and deliverable site on the edge of Ipswich. The Key Diagram shows this site as a 'broad location' and we submit that it should be an allocation in accordance with policy SCLP12.24 of the Suffolk Coastal Final Draft Local Plan. The Ipswich draft Core Strategy should also provide increased flexibility to enable the site to come forward prior to 2031.
ISPA1 Growth in the Ipswich Strategic Planning Area	We generally support this policy in terms of the identified targets and commitment to joint working. As detailed in the attached submission, land within our client's control falls within both Ipswich Borough's boundary and Suffolk Coastal District and through a master planned approach can deliver an extension to the built up area of Ipswich.
ISPA4 Cross Boundary Working to Deliver Sites	We support the inclusion of land within our client's control at Humber Doucy Lane on the northern edge of Ipswich, however it is submitted that this site should be an allocation rather than a broad location. This would accord with the approach taken by Suffolk Coastal District Council in their draft policy SCLP12.24 of the Suffolk Coastal Final Draft Local Plan. Furthermore, we submit that the plan should provide increased flexibility to come forward before 2031. Further details in relation to this site are set out in the attached representation.
CS2 Location and Nature of Development	We partially support and partially object to this policy as it is currently drafted. We support the inclusion of land within our client's control at the northern end of Humber Doucy Lane, however we submit that this land should be an allocation rather than a broad location and the plan should be worded to provide flexibility for the site to come forward earlier in the Plan period. This objection should be considered in the context of the Council's inability to meet their housing requirements in the early years of the Plan period (as set out in our response to Policy CS7).

## PART B CONTINUED

Section/Chapter or Site reference:	Comment (expand the boxes if necessary or continue on separate sheets; please ensure your name and the question number(s) are included on additional sheets.)
CS7 Amount of New Housing Required	We object to this policy and challenge the Council's proposal to restrict development at land at Humber Doucy Lane to the end of the Plan period (post 2031) given that the Council cannot meet their housing requirements in the early years of the Plan period and therefore are having to rely on a stepped approach. National Planning Policy Guidance (NPPG) identifies that when using such a stepped approach, Council's must not "seek to unnecessarily delay meeting identified development needs." We submit that a delay to delivery at Humber Doucy Lane is unnecessary and that greater flexibility should be provided to enable land at Humber Doucy Lane to come forward earlier in the Plan period, which will assist the Council's housing land supply position.
Ipswich Site Allocations DPD	Despite the inclusion of land at Humber Doucy Lane within the Council's strategy, this site is not referenced within this document. The site should be included as an allocation (as identified elsewhere within our representations) and therefore should be included within the Site Allocations DPD.

**Please ensure that Part B of your form is attached to Part A and return both to the Council's Planning Policy Team at [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk) or the postal address provided above by 11.45pm on Wednesday 13<sup>th</sup> March 2019**

### Privacy notice

Ipswich Borough Council is the data controller for the purposes of the Data Protection Act 2018 and other regulations including the General Data Protection Regulation (Regulation (EU) 2016/679).

As part of our public task, we will process your comment, and store your contact details. Your comments and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address or telephone number. The above purposes may require disclosure of any data received in accordance with the Freedom of information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

We will hold this information for 5 years and will contact you again before this period expires to see if you wish to continue to take part in other planning consultations.

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## Representations to the Public Consultation Ipswich Local Plan Review Preferred Options

### Prepared by Phase 2 Planning and Development Ltd on behalf of The Kesgrave Covenant Ltd

These detailed representations have been drafted in support of our representations in relation to the following policies, as summarised on the representation form:

#### Core Strategy and Development Policies Plan:

- Key Diagram (page 24 of the Core Strategy and Policies Development Plan)
- Policy ISPA1 Growth in the Ipswich Strategic Planning Area
- Policy ISPA4 Cross Boundary Working to Deliver Sites
- Policy CS2 Location and Nature of Development
- Policy CS7 Amount of New Housing Required

#### Ipswich Site Allocations DPD:

- General (exclusion of land at Humber Doucy Lane)

### **Detailed Representation**

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:
  - It is located in a sustainable location, adjoining the existing built up area of Ipswich, with good access to facilities and services including good access by sustainable transport modes.
  - It is capable of providing safe and suitable access to the site for all users. The site can be easily accessed as the land parcels proposed for development have significant frontages onto Humber Doucy Lane.
  - As far as we are aware, SCC Highways have not expressed any objections to the proposal to allocate development in this area.
  - A number of transport/highways mitigation measures will be considered as part of the proposals including upgrading of the junctions of Humber Doucy Lane/Tuddenham Road and Tuddenham Road/Church Road.
- The Local Plan Transport Modelling Report prepared by WSP in 2018, as set out in more detail below concludes that Suffolk can accommodate the proposed housing growth.
- 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.