

## Suffolk Coastal Local Plan Examination

**Hearing Day 5** 

## **Matter 3 Area Specific Strategies**

## Note on Policy SCLP12.24 Land at Humber Doucy Lane

- This note responds to the action arising during the hearing session on Matter 3 (Wednesday 4<sup>th</sup> September, AM) whereby the Inspector has asked the Council to consider alternative wording which reconsiders the reference to the site allocation being developed post 2031.
- Policy SCLP12.24 relates to the allocation of land at Humber Doucy Lane for 150 dwellings as part of a larger development which would also include land within Ipswich Borough (Document A1, pages 252-254). The allocation forms an agreed approach between East Suffolk Council and Ipswich Borough Council, as set out in the Ipswich Strategic Planning Area Statement of Common Ground (Document A13, page 12).
- 3. The Inspector, in his initial Matters, Issues and Questions asked "What is the justification for the allocation of land at Humber Doucy Lane coming forward beyond 2031? Is Policy SCLP12.24 developable within the plan period?". The Council provided a response to this question as set out on pages 30-32 of its Matter 3 Statement (SCLP12.1-SCLP12.33). This response explains that this is an approach agreed between both East Suffolk Council and Ipswich Borough Council. The Council's response explains that the requirement for the development to come forward post 2031 relates to constraints in the shorter term relating to the provision of primary education and to enabling the delivery of the Ipswich Garden Suburb (in Ipswich Borough) to become established. This is explained in paragraph 12.215 of the Final Draft Local Plan.
- 4. Policy ISPA4 of the Ipswich Core Strategy and Policies Development Plan Document Review Preferred Options (November 2018, Document H29, page 30) sets out the equivalent policy which would relate to the area of land in Ipswich Borough. Draft Policy ISPA4 refers to a "broad location for future housing growth and associated infrastructure improvements at the northern end of Humber Doucy Lane adjacent to Tuddenham Road". This broad location within Ipswich Borough is indicated on the Ipswich Preferred Options Draft Policies Map (November 2018).
- 5. Both policies (SCLP12.24 and ISPA4) would require the site to be masterplanned as one development. In this respect the allocations reflect that development coming forward in one authority's area on its own would not be supported. However, it is acknowledged that, from a timing and phasing perspective, the land in East Suffolk has a greater dependency on the development of the land within Ipswich Borough due to the access to the site being required to be through the land in Ipswich Borough (paragraph 12.210 of the Final Draft Local Plan). For the purposes of the Suffolk

Coastal Local Plan, it is therefore considered that Policy SCLP12.24 would remain an effective policy by replacing the referencing to post 2031 with a requirement for the timing of the development to reflect that coming forward within Ipswich Borough.

- 6. As a result of our ongoing liaison and duty to co-operate with Ipswich Borough Council an additional modification is proposed to include a requirement for a project level Habitats Regulation Assessment. A further modification is also proposed for consistency in relation to terminology with reference to a 'green trail'.
- 7. The modifications set out below would provide for this approach. Insertions are shown in <u>underline</u> and deletions are shown in <del>strikethrough</del>. The Council will include this revised wording in the schedule of modifications that is being collated as part of the Examination. A further modification has also been agreed through the Statement of Common Ground with Historic England, through the inclusion of a criterion (which would now be criterion i), and is shown in the modifications below for clarity.

Modification to paragraph 12.210:

"Suffolk Coastal District borders Ipswich Borough. The Ipswich Borough boundary is tightly drawn and to assist with enabling the housing need for Ipswich to be met within the Borough, land at Humber Doucy Lane within Suffolk Coastal District is identified as an allocation for housing development which would come forward as part of a masterplanned approach including land within Ipswich Borough. It would not be appropriate for the land in Suffolk Coastal District to come forward without the land in Ipswich Borough as access to the site is required through land in Ipswich Borough. <u>An equivalent policy relating to land within Ipswich Borough is being established through</u> <u>the Ipswich Local Plan, which is currently under preparation.</u>"

Modification to paragraph 12.214:

"The Settlement Sensitivity Assessment identifies opportunities in this area to soften the urban edge of Ipswich, and therefore development would be expected to provide significant landscaping and open space in the north eastern part of the site which would also act to retain separation and the rural character of the area around Tuddenham Lane to the north. This could also help with the delivery of a 'green trail rim' around Ipswich, which is a well-established policy within the Ipswich Borough Council Local Plan."

Modification to paragraph 12.215:

"The site is identified to come forward post 2031 to enable the delivery of the Ipswich Garden Suburb to become well established and for infrastructure such as the primary school associated with the Ipswich Garden Suburb to be delivered. The site is in close proximity to the Ipswich Garden Suburb, a strategic allocation in the adopted Ipswich Local Plan which is anticipated to deliver approximately 3,500 dwellings and other uses, including three new primary schools, largely over the course of the Local Plan period. Primary school capacity is a current constraint on development at Humber Doucy Lane coming forward, and it is anticipated that additional capacity can be provided through the planned new provision at the Ipswich Garden Suburb to ensure there is adequate provision for this development. This is anticipated to affect the timing of development coming forward."

Insert new paragraph after paragraph 12.218:

"<u>Project level Habitats Regulation Assessment will be required and should be carried out alongside</u> the master planning process, considering the whole site along with the adjacent allocation in Ipswich Borough. Project level HRA will need to demonstrate that adverse effects can be prevented with long term mitigation measures."

Modification to paragraph 12.219:

"Rushmere Hall Primary School is operating close to capacity and is forecast to exceed capacity. Consideration will therefore need to be given to the provision of primary school spaces to meet the <u>needs arising from the development</u> which may include a contribution towards the provision of additional spaces at the Ipswich Garden Suburb, as referred to above. Northgate High School is expected to exceed capacity, with new provision due to be made at Ipswich Garden Suburb. Between them, these schools should be able to make provision for these pupils, although a contribution would be required through the Community Infrastructure Levy towards additional spaces."

Modifications to policy SCLP12.24:

"9.9ha of land to the east of Humber Doucy Lane is identified to come forward for the development of approximately 150 dwellings <u>in conjunction with land identified in the Ipswich Local Plan.</u> -post 2031. Development will <u>only</u> 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 trail-rim' around Ipswich and provision of on-site open space;
- e) Provision for sufficient primary school spaces;

- <u>f)</u> e) Provision of a soft edge to the urban area through the provision of significant landscaping;
- g) f) Promotion of the use of sustainable modes of transport; and
- h) i) An archaeological assessment will be required-;
- i) j) Design, layout and landscaping of the development should be carefully designed to preserve the setting of the nearby listed buildings; and
- <u>i)</u> <del>k)</del> <u>A project level Habitats Regulations Assessment will be required.</u>

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."