

Statement of Common Ground (DRAFT)

Site Address: Land Between Humber Doucy Lane And Tuddenham Lane, Ipswich, Suffolk

Date: 23-08-24

Introduction

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

The Proposed Development

2. The description of development is agreed between the parties as being:

"Hybrid Application - Full Planning Permission for the means of vehicle, cycle and pedestrian access to and from the site. Outline planning application (all matters reserved) for a mixed use development for up to 660 dwellings (Use Class C3), up to 400 sq m (net) of non-residential floorspace falling within Use Class E and/or Use Class F2(b), an Early Years facility, and associated vehicular access and highway works, formal and informal open spaces, play areas, provision of infrastructure (including internal highways, parking, servicing, cycle and pedestrian routes, utilities and sustainable drainage systems), and all associated landscaping and engineering works."
3. The parties agree that the 'hybrid' or detailed element of the application relates to the means of vehicular, pedestrian and cycle access to the Appeal Site, as shown on the following plans:
 - 890695-RSK-ZZ-XX-DR-C-0001-P02-Proposed Access Strategy Sheet 1
 - 890695-RSK-ZZ-XX-DR-C-0002-P02-Proposed Access Strategy Sheet 2
 - 890695-RSK-ZZ-XX-DR-C-0003-P02-Proposed Access Strategy Sheet 3
 - 890695-RSK-ZZ-XX-DR-C-0004-P02-Proposed Access Strategy Sheet 4
 - 890695-RSK-ZZ-XX-DR-C-0005-P02-Proposed Access Strategy Sheet 5
 - 890695-RSK-ZZ-XX-DR-C-0006-P01-Proposed Access Strategy Sheet 6
4. Other than the above specific matters of detail, the application is wholly in Outline with all matters reserved, and with the following parameter plans submitted for approval:
 - HDL-PRP-XX-XX-DR-A-08201_P01 Parameter Plan - Land Use
 - HDL-PRP-XX-XX-DR-A-08202_P02 Parameter Plan - Green and Blue Infrastructure
 - HDL-PRP-XX-XX-DR-A-08203_P02 Parameter Plan - Access and Vehicular Movement
 - HDL-PRP-XX-XX-DR-A-08204_P02 Parameter Plan - Public Transport
 - HDL-PRP-XX-XX-DR-A-08205_P03 Parameter Plan - Pedestrian Movement
 - HDL-PRP-XX-XX-DR-A-08206_P02 Parameter Plan - Cycle Movement
 - HDL-PRP-XX-XX-DR-A-08207_P01 Parameter Plan - Maximum Density
 - HDL-PRP-XX-XX-DR-A-08208_P01 Parameter Plan - Maximum Height

5. The parties agree that the only other formal application plans submitted as part of the applications are the Site Location Plan (HDL-PRP-XX-XX-DR-A-08200_P01) and Existing Site Context Plan (HDL-PRP-XX-XX-DR-A-08103_P01).
6. The parties agree that all other material/plans submitted as part of the application documentation are for illustrative or informative purposes only.

Matters of Agreement

The Appeal Site and Surroundings

7. The parties agree that the Appeal Site lies on the north-east side of Ipswich, approximately 3km in a straight line from Ipswich town centre. It extends to 31.52 hectares in area.
8. The parties agree that the site is a sustainable and appropriate location for residential development.

Planning History

9. The parties agree that there is no relevant planning history in respect of the development of the Appeal Site for residential purposes. The relevance or otherwise of the planning history in respect of the use of part of the Appeal Site for rugby will be addressed by the parties in proofs of evidence.

Development Plan Policy

10. The parties agree that the following Development Plan documents are relevant to the Appeal Scheme and form part of the Development Plan for the purposes of s38(6):
 - 2020 Suffolk Coastal Local Plan
 - 2022 Ipswich Core Strategy and Policies Development Plan Document Review
 - 2023 'Made' Rushmere St Andrew Neighbourhood Plan
11. The parties agree that the Appeal Site is allocated for development in the adopted Ipswich and East Suffolk Development Plans. The Ipswich site allocation is Policy ISPA4.1 and the East Suffolk site allocation is SCLP12.24.
12. The parties agree that the alleged conflict with IBC Policies CS8 (Housing Type and Tenure), CS12 (Affordable Housing), CS16 (Green Infrastructure, Sport and Recreation), and CS17 (Delivering Infrastructure) relates only to the absence of s106 obligations. Likewise, the alleged conflict with ESC Policies SCLP3.5 (Infrastructure Provision), SCLP5.9 (Self Build and Custom Build Housing), and SCLP5.10 (Affordable Housing on Residential Developments) similarly relates only to the absence of s106 obligations.

Matters of Disagreement

13. The parties **do not agree** on whether or not there is any conflict between the Appeal Scheme and the site allocation policies.
14. The parties **do not agree** on whether or not there is any conflict between the Appeal Scheme and the following policies listed on the respective Decision Notices:

Ipswich Plan

- DM1 (Sustainable Construction)
- DM3 (Air Quality)
- DM4 (Development and Flood Risk)
- DM5 (Protection of Open Spaces, Sports and Recreation Facilities)
- DM6 (Provision of new Open Spaces, Sports and Recreation Facilities)
- DM8 (Natural Environment)
- DM12 (Design and Character)
- DM13 (Built Heritage and Conservation)
- DM18 (Amenity)
- DM21 (Transport and Access in New Developments)
- DM24 (Archaeology)

East Suffolk Plan/ Rushmere St Andrew Neighbourhood Plan

- SCLP7.1 (Sustainable Transport)
- SCLP8.2 (Open Space)
- SCLP9.6 (Sustainable Drainage Systems)
- SCLP10.1 (Biodiversity and Geodiversity)
- SCLP10.3 (Environmental Quality)
- SCLP10.4 (Landscape Character)
- SCLP11.1 (Design Quality)
- SCLP11.2 (Residential Amenity)
- SCLP11.7 (Archaeology)
- NP Policy RSA 9 (Design Considerations)
- NP RSA 11 (Open Space, Sport, and Recreation Facilities)

Further Common Ground

15. The parties agree to work together to identify further areas of common ground, with a view to providing a supplemental Statement (including a schedule of conditions) for the Inspector's further assistance.

Signatures

ON BEHALF OF IPSWICH BOROUGH COUNCIL

Signed.....

Name.....

Dated.....

ON BEHALF OF EAST SUFFOLK COUNCIL

Signed.....

Name.....

Dated.....

ON BEHALF OF THE APPELLANTS

Signed.....

Name.....

Dated.....