



## Rushmere St Andrew Neighbourhood Plan Referendum

# Summary of Representations

This document contains summaries of the representations made in response to the publication of the Submission Rushmere St Andrew Neighbourhood Plan which was held between 11<sup>th</sup> April and 6<sup>th</sup> June 2022. The full representations were submitted to the Examiner for consideration during the Examination of the Rushmere St Andrew Neighbourhood Plan. Full copies of the representations can be viewed on the following webpage:

[www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/rushmere-st-andrew-neighbourhood-area/](http://www.eastsuffolk.gov.uk/planning/neighbourhood-planning/neighbourhood-plans-in-the-area/rushmere-st-andrew-neighbourhood-area/)

Respondent	Summary of representations
East Suffolk Council	<p>East Suffolk Council supports the preparation of the Rushmere St Andrew Neighbourhood Plan. The Council provided comments in response to the Regulation 14 consultation, which included a number of changes. Some of these changes have been made but there are still a number of outstanding matters.</p> <p><b>Page 10, paragraph 3.5</b> –To accurately reflect the Local Plan, it is recommended that policy SCLP12.24, which allocates 150 dwellings, is referenced.</p> <p><b>Page 10, paragraph 3.6</b> – Recommended explanation of paragraph three of policy SCLP12.18 which provides an overview of the residential strategy of communities surrounding Ipswich, which includes Land at Humber Doucy Lane.</p> <p><b>Page 11, paragraph 3.7</b> –Recommend adding that the neighbourhood plan cannot promote less growth than the Local Plan and that the allocation within East Suffolk is for 150 dwellings, the remainder located in the Ipswich Borough Council area.</p> <p><b>Section 4, page 13</b> – Use of the word ‘rigorously’ could imply that growth on the western side of the parish will not be supported. This doesn’t reflect the Government aims for neighbourhood plans to plan positively for growth.</p>

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	<p><b>Page 14, paragraph 5.5</b> –State that the Ipswich Local Plan was adopted in March 2022. Final sentence should state that 150 dwellings are located in the Ipswich part of the site and the remaining 449 dwellings in the Ipswich part.</p> <p><b>Policy RSA1 – Planning Strategy</b> Final sentence should refer to Suffolk Coastal Local Plan because this is the one that applies to Rushmere St Andrew.</p> <p><b>Policy RSA2 – Land at Humber Doucy Lane</b> Supporting text should link to relevant parts of Local Plan policy SCLP12.24, in particular the parts about landscape and impact upon the surrounding area.</p> <p>Cycle access onto Tuddenham Lane is welcomed and is consistent with its status as a quiet lane. The Neighbourhood Plan could go further by referencing the East Suffolk Cycling and Walking strategy in policy RSA2 and seeking to deliver enhancements through the delivery of land at Humber Doucy Lane.</p> <p><b>RSA6 – Local Green Spaces</b> RSA6 could set out that development on identified green space will only be supported in exceptional circumstances unless it will enhance the role and function of the local green space. The supporting text could recognise that cycling and walking infrastructure could be consistent with local green space policy.</p> <p>A number of inconsistencies between mapping in the Neighbourhood Plan and in the Appraisal of Local Green Spaces are highlighted.</p> <p><b>RSA8 – Rushmere Village Special Character Area</b> The second paragraph should be re written to not imply that all development will result in harm and need to demonstrate public benefit.</p> <p><b>RSA9 – Design Considerations</b></p> <p>Criterion b) May be circumstance where development could be compatible with role of open space, and the wording could better reflect this.</p> <p>Criterion d) There may be some instances where on-street or communal parking may be appropriate.</p> <p>Criterion k) Amendments made since reg 14 consultation address previous concerns.</p> <p><b>RSA10 – Village Services and Facilities</b></p> <p>It is unclear how the facilities on the Aries Business Park perform a community use.</p>

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	<p><b>RSA11 – Open Space, Sport and Recreation Facilities</b>  It would be helpful if the supporting text could explain how the policy will interact with Local Plan policy SCLP12.22 where they overlap.</p> <p>Para 1: Seeks to prevent parking on nearby roads, but in practice this is not possible. The policy should refer to sustainable access and the provision of facilities such as secure parking.</p> <p>Para 3: A facility may meet needs of a wider area, not just one settlement.</p> <p>Final para: It is presumed that ‘intrusive’ applies to amenity however the policy could be clearer in this respect.</p> <p><b>Community Aspiration 13 – Encouraging Walking and Cycling</b>  Support acknowledgement of the Cycling and Walking Strategy in paragraph 5.6. Policy RSA2 could also refer to the Cycling and Walking Strategy. This would help to deliver the aims of the Cycling and Walking Strategy and the objectives of NPPF paras. 104-106, as well as Suffolk Coastal Local Plan policy SCLP7.1.</p> <p><b>The Policies Map</b>  There are a number of inconsistencies in the way Local Plan and Neighbourhood Plan policies are labelled in the keys on each of the policies maps:</p> <ul style="list-style-type: none"> <li>• Recreation and Open Space in Rushmere (Local Plan policy SCLP12.22) – is shown on Policies Map North and The Street – Inset Map is inconsistently labelled – it should be Recreation and Open Space in Rushmere (SCLP12.22) on both maps. This can be removed from Policies Map South.</li> <li>• Map keys do not show policy numbers consistently.</li> <li>• Key for policies Map North should include SCLP12.24. Policies Map North also shows Ipswich Local Plan allocation ISPA4.1 but there needs to be labelling to explain these areas.</li> </ul> <p><b>Settlement Boundary</b>  Errors in the mapping of the Settlement Boundary need to be corrected.</p> <p><b>Parish Boundary</b>  Maps 2, 3 and 5 show errors in the parish boundary:</p> <p><b>Infrastructure</b>  Neighbourhood Plans are encouraged to include a section about infrastructure priorities alongside those in the Local Plan.</p>

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<b>Historic England</b>	Historic England does not wish to comment on the Neighbourhood Plan at this time. Refers back to comments made at the Reg 14 stage and further Historic England information on Neighbourhood Planning.
<b>Ipswich School (Boyer Planning)</b>	<p><b>1. Introduction</b></p> <p>Ipswich School Sports Centre is accessed off The Street and Eaton Place and provides a range of indoor and outdoor sports facilities. Supports the principles of protecting open space and sports provision in Rushmere St Andrew and ensuring that land is retained for these purposes.</p> <p>National Planning Practice Guidance requires neighbourhood plan policies to be clear and unambiguous and should be in general conformity with the Local Plan.</p> <p>The Suffolk Coastal Local Plan was adopted in September 2020 and Rushmere St Andrew Neighbourhood Plan should be in general conformity with the evidence and reasoning of this Local Plan.</p> <p>Ipswich School welcomes the production of the Neighbourhood Plan.</p> <p><b>2. Rushmere St Andrew Neighbourhood Plan</b></p> <p><b>Vision</b></p> <p>Ipswich School is broadly supportive of the vision to 2036. Welcomes bullet pt. 1, which refers to abundance of sports facilities.</p> <p>Concern about the words ‘rigorously protected from development and encroachment’ in bullet pt. 6. Whilst Ipswich School recognises the desire to maintain separation between Rushmere St Andrew and Ipswich this should not come at the expense of development and enhancing sports facilities.</p> <p><b>Policy RSA1 – Planning Strategy</b></p> <p>Policy RSA1 states that Rushmere St Andrew will only accommodate development commensurate with the parish’s designation in the Local Plan. It is welcomed that policy outlines that development outside of the settlement boundary will only be permitted when in accordance with local and national policies.</p> <p>Local Plan policy SCLP12.22 identifies recreation and open space in the parish and it is clear that this is to retain settlement separation as well as meet recreational needs of East Suffolk and Ipswich Borough.</p>

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	<p>It is suggested that Local Plan policy SCLP12.22 is added to the table of relevant policies found underneath policy RSA1.</p> <p>Reference to Local Plan SCLP12.22 into policy RSA1 and its supporting text will ensure that the Neighbourhood Plan meets basic condition d).</p> <p><b>RSA3 – Protection of Landscape Character and Important Views</b>                      It is disappointing that no reference is made to Ipswich Town Football Club and other sports clubs, which form an important part of the character of the area and have shaped its land use.</p> <p>Local Plan policy SCLP12.22 seeks to retain settlement separation and the ‘presence of formal and natural open green spaces’ is clearly referenced. Policy RSA3 does not reflect the Local Plan policy.</p> <p>Map 3 on page 20 sets out a number of important views. Ipswich School note that none of these include sport and recreation areas, which is agreed. However, the policy should not just focus on the ‘Important View’ but should instead reflect the landscape character of the neighbourhood plan area.</p> <p><b>RSA5 – Settlement Gaps</b>                      Policy RSA5 seeks to preserve settlement gaps and the parish’s separate identify.                      Ipswich School supports the policy but would welcome reference to sport and recreation facilities in maintaining settlement gaps, particularly regarding land between Ipswich and Rushmere village.</p> <p>Policy RSA5 should specify the role that sports and recreation play in preventing coalescence.</p> <p>Failure to accord with SCLP12.22 may mean the neighbourhood plan does not meet the basic conditions, especially condition e), which requires the neighbourhood plan to be in conformity with the Local Plan.</p> <p><b>RSA9 – Design considerations</b>                      Ipswich School understands the importance of the policy to retain open spaces in the form of fields and sports pitches to prevent the coalescence of Rushmere village with the built-up area of Ipswich.</p> <p>The policy will require flexibility to accommodate changing circumstances, in particular the need of Ipswich School to invest in and upgrade its facilities.</p>

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	<p>Any future development of the sports centre and pitches will have regard to the design guidelines and codes, as well as policy RSA9 and Local Plan policy SCLP11.1.</p> <p>Policy broadly accords with basic conditions a) and d).</p> <p><b>RSA10 – Parish Services and Facilities Proposals</b>                      Policy RSA10 should be expanded to include the Ipswich School Sports Centre, because this provides important sport and recreational facilities for the local community. This could also be applied to other facilities, such as Ipswich YM Rugby Club and Ipswich Wanderers football ground.</p> <p>Ipswich School Sports Centre is identified in Local Plan policies maps (51 and 52) under Local Plan policy SCLP12.22. This is an important policy which supports the development of sports and recreation facilities, as well as providing a degree of separation between Rushmere and Ipswich and should be referenced under policy RSA10.</p> <p>Policy RSA10 fails to meet basic conditions a), d) and e) as it does not protect the loss of clubs and sporting facilities.</p> <p><b>RSA11 – Open Space, Sport and Recreation Facilities</b></p> <p>Supports RSA10 as it seeks to provide and protect sports and recreation facilities and accords with Local Plan policy SCLP8.2.</p> <p>Welcomes the policy, which notes the development of pavilions, courts and other paraphernalia. This is because it is highly likely that the school will need to invest, upgrade buildings or enhance pitches to provide high quality facilities for the local and wider community over the plan period and the parish should accommodate this.</p> <p>Last sentence of policy RSA11 is vague and should be reworded. Sports facilities require floodlighting, particularly during the darker winter months. It should be consistent with policy RSA9, criterion j), which states that light can be accepted provided that ‘adequate mitigation can be incorporated as part of the proposal.’</p> <p>Local Plan policy SCLP12.22 should be included in RSA11 because it supports the development of sport and recreational facilities. Policy SCLP11.1 should be considered because it references the neighbourhood plan and both are interlinked.</p> <p>Policy RSA11 broadly meets basic conditions a), d) and e) but requires rewording to accommodate floodlighting.</p>

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	<p><b>Policies Map North – and in the Neighbourhood Plan</b> Does not support this policy because the two maps listed above do not reflect maps 51 and 52 of the Local Plan. In this respect the policy does not meet basic condition e).</p> <p><b>Other Considerations</b> Due west of the neighbourhood plan area is a strip of land that runs parallel to Humber Doucy Lane. Ipswich Borough Council has safeguarded this land in their adopted policies map (March 2022) as countryside.</p> <p>This is part of a larger agricultural field that falls within East Suffolk. As the site straddles two local authority areas it is important that these local authorities cooperate over the handling of any future planning application.</p> <p>This strip of land could accommodate a residential development which, if well designed, could maintain the openness of the site.</p> <p><b>Conclusion</b></p> <p>Ipswich School Sports Centre is a long-established used that provides sports facilities for pupils of Ipswich School and the wider community.</p> <p>Built facilities, such as changing rooms and clubhouses, defines the character of Rushmere St Andrew. Representations are intended to enable continued use of the facilities and to provide greater flexibility to enable enhancements and maintenance.</p>
<p><b>Kesgrave Town Council</b></p>	<p>Broadly support the Plan, with two comments.</p> <ol style="list-style-type: none"> <li>1. Questions the phrase ‘encroachment from the Kesgrave Conurbation’ which appears to be posed as a threat. Kesgrave is not a conurbation and does not seek ‘encroachment’ upon its neighbours. This would not be in accordance with Kesgrave Neighbourhood Plan policy KE3b. We have a joint interest in avoiding further coalescence and the wording here could reflect that in a more positive way.</li> <li>2. Section 4 is entitled Vision and Objectives. We could not see any objectives.</li> </ol>
<p><b>National Highways</b></p>	<p>The A14 and its junctions are reaching capacity and so it is important to manage the impact of development. The growth in this neighbourhood plan is in the Ipswich Model so that the impact can be accessed and a strategy for dealing with it developed.</p>

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	<p>Content with the proposed Rushmere St Andrew Neighbourhood Plan. The proposed scale of the neighbourhood plan would not impact upon the strategic road network.</p>
<p><b>Natural England</b></p>	<p>Natural England does not have any specific comments on this neighbourhood plan. However, includes an annex, which covers issues and opportunities that should be considered in the neighbourhood plan process.</p>
<p><b>Suffolk County Council</b></p>	<p>SCC welcomes changes made in response to the Reg 14 consultation.</p> <p><u>Health and wellbeing.</u></p> <p>SCC questions how the plan meets the needs of an ageing population, as stated in the Vision and in paragraph 2.13.</p> <p>SCC recommends amendments to include information about the needs of older residents are being met, and recommends specific wording for policy RSA9.</p> <p><u>Transport and Parking</u></p> <p>During pre-submission consultation SCC noted existing issues with inconsiderate and dangerous parking occurring on pavements.</p> <p>Parking should where possible be provided on the plot, but some on-street parking is inevitable.</p> <p>Well-designed on-street marking can reduce inconsiderate parking and aid access for large vehicles, such as buses and ambulances.</p> <p>Specific changes are recommended to policy RSA9:</p>
<p><b>Suffolk Wildlife Trust</b></p>	<p><u>Chapter 6 – Landscape and the Environment</u></p> <p>Pleased to note paragraph 6.1, which detailed strong support in the resident’s survey for protecting the natural environment.</p>



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	<p>Paragraph 6.8 is also quoted.</p> <p><u>Important areas for the natural environment of the parish</u></p> <p>Rushmere Heath and Ipswich Golf Course are both county wildlife sites and are remnants of ‘sandlings’ lowland heath, are the most important areas for wildlife in the parish.</p> <p>Mill Stream Local Nature Reserve is a third important site.</p> <p><u>The importance of lowland heath</u></p> <p>Lowland heath is a priority because it is a rare and threatened habitat. It has declined greatly in the last two centuries.</p> <p>It is home for specialised plants and animals, particularly reptiles. The heathland is also a habitat for rare birds and invertebrates.</p> <p>The UK has a responsibility to preserve this habitat and it has an intrinsic appeal because it creates a sense of wilderness. Lowland heath is prioritised under the NERC Act, 2006.</p> <p><u>Landscape Appraisal</u></p> <p>Welcomes recognition of heathland in the landscape appraisal.</p> <p>Paragraph 6.3 – recognises estate sandlands.</p> <p>Paragraph 6.6 states that the following qualities should be retained and enhanced –</p> <ul style="list-style-type: none"> <li>• Significant areas of open space, common and woodland.</li> <li>• Distinctive sandling landscape in the centre of the parish.</li> <li>• Small stream valleys create topographic variation across the common and through built up areas to the east.</li> </ul> <p><u>Wildlife management and the environment</u></p> <p>Paragraphs 6.9 and 6.10 – Welcomes recognition of importance of Rushmere Heath, but the importance of Ipswich Golf Club should also be recognised.</p> <p>Supports policy RSA3 in relation to conserving landscape, heritage and rural character of the neighbourhood plan area.</p> <p>Supports policy RSA4 in that it seeks to avoid loss or substantial harm to trees hedgerows and other features and seeks mitigation where this is not possible. Pleased to see reference to biodiversity net gain.</p>

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	<p>Recommends policy RSA4 makes reference to need to protect Rushmere Heath and Rushmere Golf Course and enhance rare lowland heath they contain. They are vulnerable to inappropriate management, intensive recreation, disturbance and pollution from nearby construction.</p> <p>The area should be managed to provide wildlife refuges as well as ensuring there are alternative areas for dog walkers in new developments.</p> <p>It is recommended that policy RSA4 should be reworded to not only protect but also <u>enhance</u> natural features.</p> <p>We recommend policy RSA4 sets out an objective to restore nature by establishing coherent ecological networks within the parish.</p> <p>We recommend that the policy should safeguard and enhance priority habitats and species as listed within the Natural Environment and Rural Communities (NERC) Act, 2006.</p>

Late Responses	
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<p><b>Environment Agency</b></p>	<p>No detailed comments to make on flood risk.</p> <p>Extension to cemetery noted. Not known if this extension has been planned or implemented and the Environment Agency has not been consulted. Therefore, cannot say whether the extension will cause any pollution.</p> <p>Cemetery extension requires a basic Tier 1 risk assessment.</p> <p>The Environment Agency will object to applications that do not meet basic controls.</p> <p>The Environment Agency, together with Natural England, Historic England and the Forestry Commission, has set out guidance that sets out sources of information as well as ideas for incorporating the environment into neighbourhood plans.</p> <p>The local authority can provide information about surface water flood risk. The surface water management plan contains information about how to reduce the risk of flooding.</p>

<b>Ministry of Defence</b>	<p>MOD has an interest in the East 2 WAM network. There is potential for development to impact on this new asset. Parts of this network pass through the Rushmere St Andrew Neighbourhood Plan area.</p> <p>The safeguarding map shows geographical extent of consultation zones and criteria associated with them. Presence and height of development, as well as the introduction of electromagnetic fields, are a particular source of concern. The MOD should be consulted wherever criteria are triggered.</p> <p>The MOD has no concerns or suggested amendments to the Rushmere St Andrew Neighbourhood Plan.</p>
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