

Responses to Rushmere St Andrew Neighbourhood Plan

Regulation 16 Publicising a Neighbourhood Plan

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What is the purpose of this document?

Rushmere St Andrew Parish Council submitted their Neighbourhood Plan to East Suffolk Council ahead of it being submitted for independent examination.

East Suffolk Council publicised the Plan and invited representations to be forwarded to the examiner for consideration alongside the Plan.

This document contains all representations received during the publicity period of 11th April 2022 to 6th June 2022.

Two representations from the Environment Agency and Ministry of Defence were received after the closing date of 5pm on 6th June. These are contained in a separate document entitled Late Responses to Rushmere St Andrew Neighbourhood Plan.

East Suffolk Council

The preparation of the Neighbourhood Plan for Rushmere St Andrew is supported and it is considered that overall the Plan complements the strategy and policies contained in the Suffolk Coastal Local Plan and, further, is a well presented Plan. We have provided comments during the preparation of the Plan, including in response to the Regulation 14 consultation. It is noted that some of the changes suggested as part of the Regulation 14 consultation response have been made, as set out in the Consultation Statement. However, there are some outstanding suggested amendments and matters. Comments on the Submission Neighbourhood Plan are set out below.

Page 10, paragraph 3.5 – The last sentence implies that under the Local Plan only new housing in groups or in small infill plots would be supported. Although it is referenced in paragraph 3.7 below, to more accurately portray the strategy of the Local Plan it is considered appropriate to also reference here the allocation of land at Humber Doucy Lane for the development of approximately 150 dwellings under Local Plan policy SCLP12.24.

Page 10, paragraph 3.6 – Related to the comment above, it would be beneficial to explain that the third paragraph of policy SCLP12.18 also provides an overview of the strategy for residential development in the communities surrounding Ipswich, and that the development of the site allocation at Land at Humber Doucy Lane is a part of this.

Page 11, paragraph 3.7 - Sentence 2 states that the neighbourhood plan cannot rescind the allocation to the north of Humber Doucy Lane. For clarity as to the way in which the Neighbourhood Plan is in general conformity with the Local Plan it may also be worth adding here that the neighbourhood plan cannot promote less growth than the Local Plan and could also explain that the part of the allocation in East Suffolk is for approximately 150 dwellings. Ipswich Borough Council adopted its Local Plan in March 2022, which includes the remainder of the allocation.

Section 4, Page 13 – The penultimate bullet point appears inconsistent with draft policy RSA2, and the allocation of the land at Humber Doucy Lane under policy SCLP12.24, in particular through the word ‘rigorously’. This could imply that growth on the western side of the parish, which is where the Land at Humber Doucy Lane is located, should not be supported. Given the existing allocation in this area, the wording is not considered to reflect the Government’s aims for Neighbourhood Plans to plan positively for growth.

Page 14, paragraph 5.5 - As this is the first time that the Ipswich Local Plan is referred to, its adoption date of March 2022 should be included. To provide context it would be helpful for the final sentence to state that approximately 150 dwellings are allocated within part of the site located in East Suffolk and 449 allocated on the part of the site located in Ipswich.

Policy RSA1 – Planning Strategy

The final sentence refers to District level policies. It would be more accurate to refer to the Suffolk Coastal Local Plan for absolute clarity. The District of East Suffolk is covered by three Local Plans – the Suffolk Coastal Local Plan, the Waveney Local Plan and the Broads Local Plan for the part of the District within the Broads. Only the Suffolk Coastal Local Plan applies to Rushmere St Andrew.

Policy RSA2 – Land at Humber Doucy Lane

It would be helpful in the supporting text to link the policy to the relevant parts of the Suffolk Coastal Local Plan policy SCLP12.24, given that this forms the context for RSA2. In particular it would be beneficial to refer to the parts of Local Plan policy SCLP12.24 that refer to landscape and impact upon the surrounding area. These include part d), which refers to the creation of a ‘green trail’ and the provision of on-site open space; part f), which refers to the provision of landscaping and a soft urban edge and part i) which requires development to include careful design and landscaping so as not to harm the appearance and setting of nearby listed buildings. Of particular relevance within the supporting text is Local Plan paragraph 12.215, which provides a general description of the surrounding area and draws attention to the need to protect listed buildings. Paragraph 12.216 describes countryside to the northeast, stating that it is relatively enclosed with a small area of mature trees. Paragraph 12.217 explains the conclusions of the Settlement Sensitivity Assessment that formed part of the evidence base of the Suffolk Coastal Local Plan.

The provision of access onto Tuddenham Lane for cyclists and pedestrians only is welcomed and is consistent with the status as a Quiet Lane as set out in Chapter 10 of the Neighbourhood Plan. The inclusion of reference to the emerging East Suffolk Cycling and Walking Strategy in paragraph 5.6 is also welcomed, however it is considered that the Plan could go further by referencing the Cycling and Walking Strategy in Policy RSA2 and specifically seeking to deliver cycling and walking enhancements through the development of the Land at Humber Doucy Lane.

RSA6- Local Green Spaces

The National Planning Policy Framework states that policies for managing development within a Local Green Space should be consistent with those for Green Belts but does not in itself set out policy for considering proposals as is implied by Neighbourhood Plan paragraph 6.23. Whilst it identifies Local Green Spaces, policy RSA6 does not currently set out a policy for how applications that may affect them will be determined. Such a policy could set out that development on an identified Local Green Space will only be supported in very special circumstances unless it will enhance the role and function of the Local Green Space. The supporting text could recognise however that introducing and enhancing cycling and walking infrastructure in such areas could be consistent with policy for Local Green Spaces,

consistent with paragraph 145 of the NPPF.

The following areas of Local Green Space look to be plotted slightly differently on the Policies Maps when compared to the areas shown in the Appraisal of Local Green Space evidence document.

- 2. The Greens in Playford Lane and Holly Lane
- 3. The Green Opposite Elm Road
- 4. The Greens between Holly Road and Elm Road
- 6. The Limes Pond, The Street, Western Boundary
- 8. Sandlings Local Nature Reserve, north east corner
- 9. The Mill Stream
- 11. Brookhill Way Open Space

This might be to do with the overlapping with other areas, such as the Settlement Boundary line but it could result in confusion over precisely where the boundaries lie. A separate map of Local Green Space in the Plan would provide clarity on the precise boundaries.

Policy RSA8 – Rushmere Village Special Character Area

We have previously commented on this policy in our Regulation 14 consultation response. As written the policy could imply that all development will result in harm and will need to demonstrate a public benefit. To address this, in the second paragraph, it is suggested that the text is re written to read ‘A proposal will not be supported where harm caused as a result of the impact of a proposed scheme...’ Use of ‘the’ implies that all development will cause harm.

RSA9 – Design Considerations

Criterion b) - It isn't clear how this part of the policy relates to other parts of the Plan in particular RSA6 which identifies Local Green Spaces. There may be circumstances where development could be compatible with the role of the open space, such as to support the introduction of cycling and walking infrastructure, and the wording could better reflect this by referring to protecting and enhancing open, green or landscaped areas.

Criterion d) states that parking should only be provided on plot. However, there may be some instances where on-street or communal parking may be appropriate.

Criterion k) - the amendments made to criterion k since the Regulation 14 consultation address our concerns about lack of general conformity with the strategic policies of the Local Plan, which were raised in our Regulation 14 response.

Policy RSA10 – Village Services and Facilities

The policy includes the Aries Business Park in the list of village services and facilities that should be protected. We have previously commented, in our response to the regulation 14 consultation, that the protection of a business park would appropriately fall within policy SCLP4.4 'Protection of Employment Premises' of the Local Plan rather than SCLP8.1. In reply, the Consultation Statement (page 92) states that the business park does include retail. However, it is considered that the nature of the retail and business uses at the business park do not represent community facilities in the sense of Policy SCLP8.1 and it is not clear in the Plan how the retail facilities on the Aries Business Park are considered to perform a community use.

Policy RSA11 – Open Space, Sport and Recreation Facilities

Suffolk Coastal Local Plan policy SCLP12.22 identifies land between Ipswich and Rushmere Street for the purpose of maintaining separation between Ipswich and Rushmere St Andrew, as well as contributing towards recreation provision. As policy SCLP12.22 is defined as a strategic policy, and the neighbourhood plan is therefore to be in general conformity with it, it would be beneficial for the supporting text to explain how the two policies will interact where they overlap. The Neighbourhood Plan policy on settlement gaps should not appear to undermine the approach in SCLP12.22 to support in principle development related to sports grounds and associated uses where these can be undertaken in a way which maintains the separation between Rushmere village and Ipswich.

The western part of the land covered by Local Plan policy SCLP12.22 does not fall within the area covered by Policy RSA11 'Open Space, Sport and Recreation Facility' on the policies map. Given that the Local Plan, through policy SCLP12.22, would support in principle the development of sports ground uses and associated uses on this land it is considered that there is benefit in policy RSA11 also relating to this area. For example, it would seem logical that policy for parking and sustainable transport (see paragraph below) would apply to proposals on any part of the land covered under policy SCLP12.22.

First paragraph – The policy seeks to ensure that development 'will not result in car parking on nearby roads'. However it would be difficult to ascertain that a development 'will not result in car parking on nearby roads' as ultimately this would be down to users of the facility. If the aim is to avoid/ mitigate issues of car parking, the policy should refer to provision of access by sustainable means (i.e., walking, cycling and public transport) and the provision of facilities such as secure cycle parking.

Third paragraph – a facility may meet the needs wider than one particular settlement. In the Regulation 14 response we queried whether the sentence intended to say '...should also take account of...'? In the Consultation Statement the Parish Council responded to say that it is, however, no changes have been made.

Final paragraph – In the Regulation 14 response we commented that this could be worded to refer to any floodlighting not having an unacceptable adverse effect on amenity. It is presumed that ‘intrusive’ applies to amenity however the policy could be clearer in this respect.

Community Aspiration 13 – Encouraging Walking and Cycling

East Suffolk Council published a draft cycling and walking strategy for consultation between 1st November 2021 and 10th January 2022 which is scheduled to be adopted in Summer/Autumn 2022. Included within the strategy are recommendations relevant to Rushmere St Andrew. Further information about the draft Cycling and Walking Strategy can be found here: <https://storymaps.arcgis.com/stories/cbc57e4a9cc24e4e7d174fb34b1bf0e>

Comments were made at the regulation 14 stage in which we suggested that the Cycling and Walking Strategy could form a part of the evidence base for the neighbourhood plan. For example, the Cycling and Walking Strategy could be used by the Neighbourhood Planning group to seek cycling and walking infrastructure improvements through policies within the Neighbourhood Plan, thereby providing greater weight to such improvements in planning terms. We therefore support acknowledgement of the Cycling and Walking Strategy in paragraph 5.6 of the Neighbourhood Plan. However, the text of Neighbourhood Plan policy RSA2 (Land at Humber Doucy Lane) could go further by referring to the Cycling and Walking Strategy – see comment above. This would support the delivery of the Cycling and Walking Strategy as well as helping to meet the objectives of National Planning Policy Framework paragraphs 104-106 and Suffolk Coastal Local Plan policy SCLP7.1 (Sustainable Transport).

The Policies map

All three policies maps have a box below entitled ‘Village Inset Map,’ but it is not clear what this is for.

A number of points throughout the Neighbourhood Plan were previously identified where the maps required correction or clarification. Many of these have been resolved but there remain some outstanding issues that need to be corrected.

There are still a number of inconsistencies in the way Local Plan and Neighbourhood Plan policies are labelled in the keys on each of the policies maps:

- Recreation and Open Space in Rushmere (Local Plan policy SCLP12.22) – this is shown on Policies Map North and The Street – Inset Map however is inconsistently labelled - it should be Recreation and Open Space in Rushmere (SCLP12.22) on both maps. It also doesn’t need to appear in the key on Policies Map South as it doesn’t extend into that area.
- More generally the keys for each of the policies maps do not consistently include policy numbers. It is important that the key to each policies map includes the policy

name and number.

- The key for Policies Map North should be clear that the dark red shaded area is that allocated under Local Plan policy SCLP12.24. Policies Map North also shows the land allocated under Ipswich Local Plan policy ISPA4.1 as a lighter shade of red outside of the Neighbourhood Plan area boundary however there should be some labelling to explain these areas.

Settlement Boundary - It is understood that there would be no change between the Settlement Boundary shown within the Local Plan policies map and the Neighbourhood Plan policies map (as set out in paragraph 5.4 of the Neighbourhood Plan). This position also forms the basis of the Strategic Environmental Assessment Screening Opinion (page 6) and the Habitats Regulations Assessment Screening Opinion (page 8, table 3), which acknowledged that there were errors in the Settlement Boundary shown in the Regulation 14 Draft Neighbourhood Plan but that these were to be corrected. On page 70 of the Consultation Statement the Parish Council also notes that these errors will be corrected. Although many of the discrepancies have been corrected some discrepancies remain between the two maps. These will therefore need to be corrected for accuracy and to ensure that the SEA and HRA screening remain valid.

Parish Boundary - There are also a number of discrepancies in the parish boundary, which will need to be corrected. The following maps appear to show an incorrect parish boundary.

Map 2 on page 15

Map 3 on page 20

Map 5 on page 39

Infrastructure

It has previously been suggested that the Rushmere St Andrew Neighbourhood Plan could include a section about infrastructure. We support and encourage neighbourhood plans to include information on infrastructure as Neighbourhood Plans provide an opportunity to set out the infrastructure priorities for the Parish alongside those identified in the Local Plan (set out in Appendix B of the Local Plan).

Please note that these comments are given at an Officer level without prejudice to any future decisions that the Council may make. I would be pleased to respond to any questions that you may have.

Historic England

Thank you for inviting Historic England to comment on the Regulation 16 Submission version of this Neighbourhood Plan.

Having reviewed the plan and relevant documentation we do not consider it necessary for Historic England to provide detailed comments at this time. We would refer you if appropriate to any previous comments submitted at Regulation 14 stage, and for any further information to our detailed advice on successfully incorporating historic environment considerations into a neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

We would be grateful if you would notify us if and when the Neighbourhood Plan is made by the council. To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Ipswich School (Boyer Planning)

1. INTRODUCTION

- 1.1 These representations are submitted by Boyer on behalf of Ipswich School in response to the consultation on the Rushmere St Andrew Neighbourhood Plan which has been submitted to East Suffolk Council ahead of it being presented for independent examination.
- 1.2 In its 600-year history, Ipswich School has been supported by local benefactors including Richard Felaw who in 1482 gave his house for the education of boys in Ipswich. Unlike many other private schools, Ipswich School does not have a major endowment and it therefore has to manage its assets carefully in order to be able to deliver its charitable objectives. As a charity, Ipswich School has a long-term strategy to open up access to the school to any worthy pupil, regardless of their ability to pay. The school see this as a major contribution to education in Suffolk, which helps address social mobility and allows pathways to be opened up to deserving pupils.
- 1.3 Ipswich School is an important landowner within the parish and provides access to sport and recreational facilities at Ipswich School Sports Centre for both pupils and the wider community.
- 1.4 The Ipswich School Sports Centre which is accessed from The Street and Eaton Place provides a mixture of indoor and outdoor sport facilities including football, netball and hockey and in recent years has undergone significant investment in the form of new pitches and improved provision.
- 1.5 The facilities in Rushmere St Andrew forms part of the school's overall provision which also includes outdoor pitches at Notcutts Field in Ipswich which has been identified as part of the future development proposals to make up the Ipswich Garden Suburb.
- 1.6 Ipswich School recognises the importance of supporting the plan making system and has regularly engaged with Ipswich Borough Council on the preparation of the Ipswich Local Plan as well as the Ipswich Garden Suburb Supplementary Planning Document. Engagement has taken place primarily as a landowner within the area but also as a key provider for education within Suffolk.

- 1.7 These representations support the principles of retaining open space and sporting facilities within Rushmere St Andrew and ensuring that the long-term future of land in this area is protected for these uses.
- 1.8 As set out within National Planning Practice Guidance (NPPG), Neighbourhood Plan policies should be clear and unambiguous (Paragraph: 041 Reference ID: 41-041-20140306). Moreover, national policy and guidance requires that Neighbourhood Plans are in general conformity with the adopted Local Plan in their area (Paragraph: 065 Reference ID: 41-065-20140306).
- 1.9 The adopted Local Plan is the East Suffolk (Suffolk Coastal) Local Plan which was adopted in September 2020. It is necessary for the preparation of the Rushmere St Andrew Neighbourhood Plan to be in general conformity with the reasoning and evidence of the Local Plan when it is made (Paragraph: 009 Reference ID: 41-009-20190509).
- 1.10 In order for a Neighbourhood Plan to become part of the Development Plan for the area it will be subject to local referendum and examination by an independent person as outlined within the Neighbourhood Planning Regulations (2012). However, prior to that the East Suffolk Council will need to consider the plan against a set of basic conditions in accordance with Paragraph: 013 reference ID: 41-013-20140306 of the NPPG.
- 1.11 The Basic Conditions relevant to the making of a neighbourhood plan are:
- Condition a: having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;
 - Condition d: the making of the neighbourhood plan contributes to the achievement of sustainable development;
 - Condition e: the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
 - Condition f: the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and
 - Condition g: prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for neighbourhood plan.
- 1.12 Ipswich School welcomes the preparation and production of the Rushmere St Andrew Neighbourhood Plan to guide the future development of the parish and

welcome the opportunity to provide comments at this stage, which we trust will assist the Parish Council.

2. RUSHMERE ST ANDREW NEIGHBOURHOOD PLAN

2.1 Within this section, responses are provided to the parts of the Rushmere St Andrew Neighbourhood Plan which we consider have a relevance on the land holdings of Ipswich School and the surrounding area. Where relevant, responses have been informed by considerations of the basic conditions in accordance with the government guidance. This Section responds to the policies in the chronological order of the Neighbourhood Plan for ease of reference.

Vision

2.2 Ipswich School is broadly supportive of the Vision for Rushmere St Andrew up to 2036. It is welcomed that the first bullet point highlights an abundance of sports facilities in the parish. Ipswich School Sports Centre provides a significant contribution to the existing facilities and over the period of the Neighbourhood Plan these will be retained and enhanced where possible, and these complement the other sports facilities in the immediate area including rugby and sports pitches.

2.3 We are however concerned about the wording “rigorously protected from development and encroachment” as found in the sixth bullet point of the vision. Whilst Ipswich School acknowledges the principle of Rushmere St Andrew maintaining separation from Ipswich, the Vision should not be restricting the redevelopment and enhancement of sport and recreational facilities that currently exist. It is unclear what is meant by “development and encroachment” as over the plan period there may be a need for further development at the Ipswich School facilities (or other sites for sport) to improve and enhance provision. Without acknowledging this in the Vision, Ipswich School are concerned that future investment at their site may be unnecessarily restricted. The wording here should be clarified to ensure appropriate development is not frustrated.

2.4 Without appropriate amendment, the sixth bullet point fails to meet the basic condition (d) in that over the plan period the Neighbourhood Plan will not contribute to the achievement of sustainable development if this area is “rigorously protected from development” as there is a potential for sporting facilities to decline in standards without future development and may require appropriate development. It also fails to meet basic condition (e) in that it is not in general conformity with Local Plan Policy SCLP12.22 which outlines that proposals for sport ground or associated uses which contribute to provision for outdoor sports and

recreation will be supported. The wording therefore should be amended to ensure that appropriate development can take place.

Policy RSA1 – Planning Strategy

- 2.5 Policy RSA1 is clear in its approach that Rushmere St Andrew will only accommodate development commensurate with the parishes designation in the adopted Local Plan. It is welcomed that the policy goes on to outline that development outside of the Settlement Boundary will only be permitted when in accordance with national and local policies.
- 2.6 Local Plan Policy SCLP12.22 identifies Recreation and Open Space uses in the parish and is clear that it has dual functions to retain settlement separation but also contributing to the recreational needs of both East Suffolk and Ipswich Borough.
- 2.7 We welcome the wording in the policy although would suggest that Local Plan Policy SCLP12.22 is added to the table of box of relevant policies found directly underneath Policy RSA1.
- 2.8 Introducing direct reference to Policy SCLP12.22 within Policy RSA1 and its supporting text will ensure that the Neighbourhood Plan meets basic condition (d) and enables the Plan to contribute towards the achievement of sustainable development.

Policy RSA3 – Protection of Landscape Character and Important Views

- 2.9 The existing sport facilities for Ipswich School, alongside the provision of Ipswich Town Football Club and other local clubs such as Ipswich Wanderers and Ipswich YM Rugby, as well as the golf club, have shaped the current use of land in Rushmere St Andrew and form part of the character of the village. It is disappointing that no reference is made to these existing sites and activities in the supporting text or Policy of RSA3.
- 2.10 Local Plan Policy SCLP12.22 seeks to retain settlement separation and the “presence of natural and formal open green spaces” is clearly referenced. As currently written, Policy RSA3 fails to meet the basic condition (e) as it does not reflect the Local Plan policy.
- 2.11 Map 3, on page 20 of the Neighbourhood Plan highlights a number of “Important Views” across the Parish. Ipswich School note that none of these include the sport and recreational 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.

Policy RSA5 – Settlement Gaps

2.12 Policy RSA5 seeks to ensure that Settlement Gaps are retained through the prevention of coalescence, and secure the retention of Rushmere St Andrew’s separate identity. To do so, the policy proposes that such gaps are protected from development. Development within settlement gaps is only to be permitted when in conformity with Policy RSA1 and meets the following conditions:

- *i) it would not undermine the physical and/or visual separation of the settlements; and*
- *ii) it would not compromise the integrity of the Settlement Gap, either individually or cumulatively with other existing or proposed development.*

2.13 Ipswich School supports the intention of the policy but would welcome a reference towards the importance of sports and recreation facilities in maintaining settlement gaps, particularly in relation to the land between Ipswich and Rushmere Village, as identified within the East Suffolk Local Plan.

2.14 East Suffolk Local Plan Policy SCLP12.22: Recreation and Open Space in Rushmere, prescribes the protection of the space between Ipswich and Rushmere Village through the provision and enhancement of sports and recreation facilities in this location. The Local Plan outlines that the retention and improvement of such facilities should enable the separation of Rushmere village and Ipswich to be maintained. Policy RSA5 should ensure it aligns with local Policy SCLP12.22 and specify the role that sports, and recreation facilities can provide in preventing coalescence.

2.15 The failure to accord with Local Plan Policy SCLP 12.22 may leave the Neighbourhood Plan in breach of the basic conditions required, in particular Basic Condition (e) requiring the plan to be in general conformity with the strategic policies contained in the development plan for the area of the authority.

Policy RSA9 – Design Considerations

2.16 We note that the location of The Ipswich School Sports Centre and adjacent sport pitches are identified as ‘The Village of Rushmere St Andrew’, one of four distinct built character areas across the Parish, and is featured on Page 29 of the Neighbourhood Plan. We understand the importance of the policy to retain the

open spaces in the form of fields and sport pitches to prevent the coalescence of Rushmere village with the built-up area of Ipswich.

2.17 Over the plan period, it is likely that the school may need to upgrade, enhance and invest in new equipment and facilities at the sport centre and pitches. Therefore, this policy will require flexibility to accommodate the changing circumstances of the site and surrounding area.

2.18 Any future development proposal in association with the sport centre and pitches will have regards to the Design Guidelines and Codes and Policy RSA9 – Design Considerations and Policy SCLP11.1: Design Quality of the Local Plan.

2.19 It is considered that the policy would broadly accord with basic conditions (a) and (d).

Policy RSA10 – Parish Services and Facilities Proposals

2.20 Policy RSA10 of the Neighbourhood Plan seeks to protect services and facilities from loss due to development and lists 11 parish services and facilities such as churches, the business park, hotel, village hall and a primary school. The policy goes on to say that the loss of services and facilities listed will be determined against Policy SCL8.1 of the Local Plan.

2.21 We consider that the list in Policy RSA10 should be expanded to include the Ipswich School Sports Centre and associated sports pitches as they are important assets to Rushmere St Andrew in terms of education, leisure and recreational facilities that currently serves the local and wider community, as well as the School, and will continue to do so in the long-term. The same could also apply more widely to sport and recreational uses such as the Ipswich YM Rugby Club, Ipswich Wanderers Football Club and the Ipswich Town Football Training Centre.

2.22 The Ipswich School Sports Centre site, amongst other sports clubs and pitches, is an important facility in Rushmere St Andrew and is identified on the Policies Maps (51 and 52) under Policy SCLP12.22: Recreation and Open Space in Rushmere. We consider Policy SCLP12.22 is an important policy in that it supports development proposals for sports ground uses, or for associated uses which contribute to provision for outdoor sports and recreation, providing the degree of separation of Rushmere village and Ipswich are maintained. We note that this policy is omitted in Policy RSA10 of the Neighbourhood Plan and should be included.

2.23 As it stands, it is considered that Policy RSA10 of the Neighbourhood Plan fails to meet the basic conditions of (a), (d) and (e) of the NPPG as it does not protect the loss of clubs and sporting facilities in the area which we consider are of importance.

Policy RSA11 – Open Space, Sport, and Recreation Facilities

2.24 We support Policy RSA11 as it seeks the provision of open spaces and sporting facilities within Rushmere St Andrew and seeks to ensure that the long-term use of the land in this area is protected for these uses would accord with this policy in the Neighbourhood Plan as well as Policy SCLP8.2: Open Space, in the adopted Local Plan.

2.25 We welcome this policy as it notes the development of club houses, pavilions, car parking provisions and other sporting paraphernalia such as artificial grass, court fencing etc. in connection with the designated land-use as it is highly likely that the school will need to invest, upgrade their buildings or enhance sport pitches to provide high-quality facilities for the local and wider community over the plan period and the Parish should accommodate such.

2.26 The last sentence of Policy RSA11, where it states that intrusive floodlighting will not be permitted, is in our opinion vague and requires rewording as certain sport pitches, courts and car parking areas will require suitable lighting for continued recreation and training purposes throughout the year and even more so during the winter months where it gets dark earlier in the evening. We need to ensure that this Policy is consistent with Policy RSA9 criterion (j) where it states that light can be accepted providing that 'adequate mitigation can be incorporated as part of the proposal'.

2.27 To improve Policy RSA11, it is considered that Policy SCLP12.22 of the Local Plan should be included as it is an important policy where it supports development proposals for sports ground and outdoor recreational uses. Policy SCLP:11.1 of the Local Plan should also be considered in Policy RSA11 as it references the Neighbourhood Plan and both are interlinked.

2.28 It is considered that Policy RSA11 in its current form broadly complies with the basic conditions (a), (d) and (e) of the NPPG but requires rewording to accommodate floodlighting to ensure the policy does not disadvantage the school's sports centre and sports pitches in the long-term.

Policies Maps – North and in the Neighbourhood Plan

- 2.29 It is noted that the ‘Policies Map (North)’ on Page 40 and ‘The Street – Inset Map’ on Page 42 of the Neighbourhood Plan shows the land use to the north and west of the designated Open Space, Sport, and Recreational Facility hatched and designated as Settlement Gaps (RSA 5). These Policies Maps in the Neighbourhood Plan do not appear to conform with the Council’s adopted Policies Maps (51 and 52) which shows the land use being protected by Policy SCLP12.22 of the Local Plan. In accordance with the National Planning Policy Framework, the onus will be on the decision-maker to decide if the land use has been interpreted correctly.
- 2.30 In this respect, we are not supportive of this policy as the Policies Maps on Pages 40 and 42 of the Neighbourhood Plan does not reflect the Policies Maps (referenced 51 and 52) in the adopted Local Plan. In this instance it is considered the Neighbourhood Plan fails to meet basic condition (e) of the NPPG and therefore should be amended accordingly.

Other Considerations

- 2.31 Located just outside the Rushmere St Andrew Neighbourhood Plan area, due west, is a strip of land that runs parallel to Humber Doucy Lane which falls within the administrative authority of Ipswich Borough Council (IBC). IBC has safeguarded this land in their adopted Policies Map (March 2022) as countryside.
- 2.32 While we note that the strip of land is open, it is evident from aerial photographs (as shown below) that it forms a part of a larger agricultural field which falls within the authority of East Suffolk Council (ESC). As the agricultural land staddles between two local authorities, it is important that the two Councils liaise and maintain a flexible and coordinated approach when determining any future applications.
- 2.33 Whilst this strip of land could potentially be used to accommodate additional sports facilities for the local and wider community should ESC find that there is a shortfall during their plan period, we consider that it could also accommodate a well-designed residential development scheme in which the openness of the area will still be maintained thus preventing the coalescence of the two councils.



3. CONCLUSION

- 3.1 These representations are submitted by Boyer on behalf of Ipswich School in response to the consultation on the Rushmere St Andrew Neighbourhood Plan which has been submitted to East Suffolk Council ahead of it being submitted for independent examination.
- 3.2 The representations have been prepared to focus on the policies within the Rushmere St Andrew Neighbourhood Plan and how they relate to the Ipswich School Sports Centre which is located within the plan area.
- 3.3 Ipswich School Sports Centre is a long-established recreational use which provides a mixture of outdoor and indoor sporting facilities and opportunities for pupils of Ipswich School but also the wider community.
- 3.4 The presence of built facilities, such as changing rooms and club houses, along with fencing and floodlighting defines the character of Rushmere St Andrew. Representations have been submitted to enable the continued use of facilities in the parish but also provide greater flexibility and acknowledgement that over the plan period enhancements may be required to maintain and improve provision of recreational opportunities.
- 3.5 We are pleased to provide representations on the Neighbourhood Plan and look forward to continuing to engage with the plan making process as progress is made towards independent examination, local referendum and the making of the Plan in the future.

Kesgrave Town Council

Kesgrave Town Council is pleased to give its broad support to the Rushmere St Andrew Neighbourhood Plan and we wish our neighbours well on its passage through the forthcoming consultative and approval procedures.

We have just two comments as follows:

1. Whilst very much identifying with the plan's Vision to protect the parish's heritage, environment and natural surroundings, as in our response to an earlier iteration of the plan, we question use of the phrase "encroachment from the Kesgrave conurbation" which appears posed as a threat (noting that further development on the northern part of neighbouring parish Purdis Farm presumably would not be and also noting that the proposed Settlement Gap on the eastern boundary of Policies Map North actually borders with the parish of Playford and not Kesgrave).

Kesgrave is not a conurbation and has no interest in, or power to effect, "encroachment" on our neighbours. Nor would this be in accord with our own neighbourhood plan, specifically Policy KE3b) stating "Development will be permitted where it would not increase coalescence with adjoining settlements, or reduce the sense of Kesgrave as a distinct and separate settlement." We jointly have an interest in avoiding further coalescence between our two neighbourhood plan areas and the wording here could reflect that in a more positive way.

2. Section 4 is entitled Vision and Objectives and whilst the box at the bottom of page 13 sets out the plan's vision we could not see any objectives.

Thank you for opportunity to comment.

National Highways

Thank you for your correspondence, received on the 11 April 2022, notifying National Highways of the consultation under the Regulation 16.

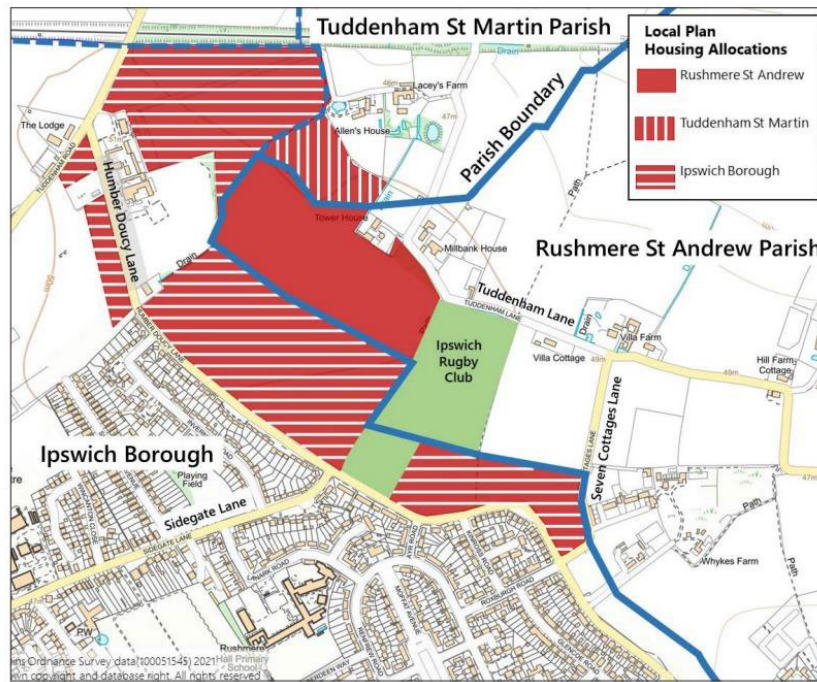
National Highways is responsible for the operation, maintenance and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. Rushmere St Andrew is situated on the eastern side of Ipswich. In the area within and surrounding the Rushmere St Andrew Neighbourhood Plan we have responsibility for the A12 and A14.

The A14 and its junctions are reaching capacity and it is important to work with the local authority and with the Suffolk County Council 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 will be developed.

Please find our comments below only to those selected policies which may have impacts to SRN.

This Rushmere St Andrew Neighbourhood Plan focuses on five themes – i) Landscape and Natural Environment, ii) Historic Environment, iii) Development Design, iv) Services and Facilities, and v) Highways and Travel, which may have local interest.

The Local Plan only allows new housing in small groups or as infill plots (para 3.5). In addition, the Local Plan has not identified the housing growth requirement, or a minimum housing requirement has been specified for this Rushmere St Andrew neighbourhood plan area. There is no new allocation for housing for this Neighbourhood Plan (para 3.8).



MAP 2 - Site at Humber Doucy Lane allocated for housing in Suffolk Coastal Local Plan and Ipswich Local Plan

The Figure above in Map 2, showing the allocated housing site for site on the Local Plan by the Suffolk Coastal and Ipswich.

After reviewing the submitted technical documents, I could state that we are in content with the proposed Rushmere St Andrew Neighbourhood Plan. With the proposed scale of proposed neighbourhood plan there would not have any impact upon the Strategic Road Network (SRN). Therefore, we have no comment.

Following the Section 38A and Section 38B of the Planning and Compulsory Purchase Act 2004, we have reviewed those draft policies against the requirements of the 'the Basic Conditions' and came to the conclusion that National Highways would have no objection progress to referendum during Summer 2022.

Please contact me (*email supplied*) if you require any clarification on the points raised above.

Natural England

Thank you for your consultation on the above dated 13 April 2022 .

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact (*email supplied*).

[Annexe 1](#)

Suffolk County Council

Thank you for consulting Suffolk County Council (SCC) on the Submission Consultation version of the Rushmere St Andrew Neighbourhood Plan.

SCC welcome the changes made to the plan in response to comments made at the Reg. 14 pre-submission consultation stage.

As this is the submission draft of the Plan the County Council response will focus on matters related to the Basic Conditions the plan needs to meet to proceed to referendum. These are set out in paragraph 8(2) Schedule 4B to the Town and Country Planning Act. The basic conditions are:

- a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan
- b) the making of the neighbourhood plan contributes to the achievement of sustainable development.
- c) the making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area)
- d) the making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

Where amendments to the plan are suggested added text will be in italics and deleted text will be in ~~striketrough~~.

Health and Wellbeing

During the pre-submission consultation, SCC raised the concern that whilst the Vision stated, "Older people can be confident that the parish has appropriate housing, services and facilities for their needs", the draft plan did not make any provisions for the needs of an ageing population.

The County Council queries how the plan meets the needs of an ageing population, as stated in the Vision, and in paragraph 2.13 which indicates that approximately 28% of the population of the parish is aged 65 or over.

As such, SCC would recommend the plan is amended to include specific information as to how the needs of ageing residents are being met.

Following guidance from footnote 46 in the NPPF “Planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.”

As such, it is recommended that the following wording is added to Policy RSA9 Design Considerations, to meet the needs of a wider range of groups including older and vulnerable people, reflecting paragraph 61 of the NPPF:

“In addition, proposals will be supported where:

1. home types meet the needs of the aging population, without excluding the needs of the younger buyers and families.”

Transport and parking

During the pre-submission consultation of the Rushmere St Andrew neighbourhood plan, SCC noted that there are existing issues with inconsiderate and dangerous parking occurring on pavements.

SCC notes the response in the Consultation Statement from the parish, and agrees that inconsiderate on-street parking can cause risk to pedestrians and other road users, and cause a hinderance to emergency services, refuse vehicles, and buses. We agree that, wherever possible, parking for the primary residents should be provided on the plot of the home. However, on-street parking will always be inevitable, from visitors, maintenance services and delivery vehicles, as on-plot parking such as driveways cannot always meet the needs of the household and its visitors.

On-street parking provision that is well-designed and integrated as part of the development will help to reduce the occurrence of inconsiderate and dangerous on-street parking from visitors to residents of the development, and ensure that large vehicles, such as emergency services and buses can access the development safely.

In order to meet part a) of the Basic Conditions (to be in conformity with paragraph 92 of the NPPF, by creating healthy, inclusive and safe places for all), the following amendments are recommended to Policy RSA9 Design Consideration:

“d. designs, in accordance with standards, maintain or enhance the safety of the highway network ensuring that all residential vehicle parking is provided within the plot, and with a proportion of parking provided on-street within any new development, but that is well designed, located and integrated into the scheme to avoid obstruction to all highway users or impede visibility, and seek always to ensure

permeability through new housing areas, ensuring safe and convenient pedestrian and cycle routes are available or can be made available to local services and facilities;”

If there is anything that I have raised that you would like to discuss, please use my contact information at the top of this letter.

Suffolk Wildlife Trust

Thank you for the opportunity to comment on this draft.

Chapter 6, Landscape and Environment

Strong public support for conserving the natural environment.

We are pleased to note that in paragraph 6.1 “the Residents’ Survey indicated that there is strong support for the natural environment and a recognition of its role in reinforcing sense of place and providing a quality environment in which to live. Some 82.7% of respondents strongly agreed that it is important to preserve the landscape features of the parish and 85% strongly agreed that protecting and preserving trees, hedgerows and ponds should be sought where appropriate in planning applications.”

In addition, Paragraph 6.8 states that “Responses to the Residents’ Survey revealed the critical importance placed on the relationship between the well-being of residents and the natural environment in and around Rushmere St Andrew”.

Important areas for the natural environment in the parish

There are two County Wildlife Sites (CWS) within the Parish, Rushmere Heath and the northern part of Ipswich Golf Course. These are the most important areas for wildlife in the parish. They are remnants of “Sandlings” lowland heath characteristic of this area. Much of this habitat has been lost to development, forestry or ploughed for agriculture. Because of its decline and rarity, lowland heath is a habitat of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. On Rushmere Heath, despite its intensive recreational use, a total of 98 flowering plant species have been recorded, for example lady's bedstraw, sheep's sorrel and harebell. Three reptile species have been recorded on the site; grass snake, slow-worm and lizard have been recorded on Rushmere Heath. All reptiles are protected under the Wildlife & Countryside Act (WCA) 1981 and are species of principal importance under Section 41 of the NERC Act 2006. Rushmere Heath CWS incorporates most of the Sandlings Local Nature Reserve, a site notable for 22 species of butterfly, including white letter hairstreak and up to 70 species of bird recorded.

Ipswich Golf Course CWS also contains remnant heathland, consisting of heather and gorse scrub fringing the fairways which provide a valuable refuge for many declining heathland species. The fairways themselves which are mown regularly, are not treated with agricultural chemicals and therefore support a fair diversity of acid grassland plants

including a number of fine-leaved grasses and clovers. Two decoy ponds surrounded by woodland are situated in the centre of the golf course. The woodland is composed mainly of oak in the drier areas and alder, willow and birch in the wetter areas fringing the open water. Marsh fern, a rare plant in Suffolk, thrives in the damp conditions and the open water areas provide an important habitat for both breeding and wintering birds. The southern part of this CWS lies within Purdis Farm parish.

A third important site for the natural environment is Mill Stream Local Nature Reserve which contains wet carr, ponds, woodland, scrub and old boundary oak trees. Water voles are present; this is rare and declining and a species of principal importance under Section 41 of the NERC Act 2006.

The importance of lowland heath

Lowland heathland, for which Rushmere Heath and Ipswich Golf Course CWS are notable, is a priority for nature conservation because it is a rare and threatened habitat. It has declined greatly in extent during the last two centuries – in England it is estimated that only one sixth of the heathland present in 1800 remains – and it still faces major pressures.

The habitat is also home to numerous highly specialised plants and animals. It is particularly important for reptiles. A number of scarce birds use lowland heathland as their primary habitat. Many scarce and threatened invertebrates and plants are found on lowland heathland.

The UK has a special obligation to conserve this habitat, given that it supports about 20% of the lowland heath in Europe. It also has high intrinsic appeal and provides a special sense of wilderness.

Lowland heathland is classed as a priority habitat under the UK Biodiversity Action Plan and therefore included in Section 41 of the NERC Act 2006.

Landscape Appraisal

We welcome the fact that the significance of the remnant heathland landscape for which the two CWS are important is recognised in the Landscape Appraisal within the plan.

Paragraph 6.3 recognises the landscape character of “Estate Sandlands (associated with Rushmere Golf Course/Common as well as north of Kesgrave and built-up urban areas)”.

In addition, Paragraph 6.6 states that the following special qualities have been identified which, wherever possible, should be retained and enhanced.

- Significant areas of open countryside, common and wooded valley within easy access of housing areas
- Distinctive sandlings character to the central portion of the parish with gorse, bracken, heather, birch and pine being characteristic
- Small stream valleys create topographic variation across the Common and through built-up areas to the east

Wildlife Management and the Environment

We welcome Paragraphs 6.9 and 6.10 which recognise the importance of Rushmere Heath as County Wildlife Site, and the importance of careful management. We **recommend** that the presence of the northern part of Ipswich Golf Course CWS in the parish is also highlighted in this section as it is equally important for the natural environment of the parish.

We **support** POLICY RSA 3 - PROTECTION OF LANDSCAPE CHARACTER AND IMPORTANT VIEWS relating to conserving the essential landscape, heritage and rural character of the Neighbourhood Plan Area.

We **support** POLICY RSA 4 - PROTECTION OF TREES, HEDGEROWS AND OTHER NATURAL FEATURES in so far as it seeks to avoid the loss of, or substantial harm to, distinctive trees, hedgerows and other natural features such as ponds and watercourses, and seeks mitigation measures where impacts are unavoidable. We are pleased to see reference to biodiversity net gain in this policy as it is a requirement under the Environment Act 2021.

However, given that the two most important areas for the natural environment in the parish are the Rushmere Heath and Ipswich Golf Course County Wildlife Sites, we **recommend** that Policy RSA 4 makes reference to the need to protect them and enhance the rare lowland heath contained in them. Although it is unlikely they would be threatened directly with development because of the nature of their ownership and, in the case of Rushmere Heath, its common land status, they are nevertheless still vulnerable to inappropriate management, intensive recreational pressures, disturbance and pollution which may increase when new houses are built in the vicinity. In particular the pressure from dog walking on these sites can degrade the habitat quality, so it is important both to manage these sites to provide undisturbed refuges and to ensure there is good provision of accessible greenspace within any new developments so that there are alternative areas for dog walkers to go.

Paragraph 174 of the National Planning Policy Framework (NPPF) states that planning policies and decisions should contribute to and enhance the natural and local environment. We therefore **recommend** that the wording of Policy RSA 4 should seek not only to protect

but to enhance features of natural environment in the parish, including lowland heath, as this has been lost from so many areas. This could be by improving the management of existing sites or by restoring such features where the opportunity arises. There may, for instance, be opportunities to restore lowland heathland habitat in other open areas or in new developments in the parish.

Paragraph 174 of the NPPF states that planning policies and decisions should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. Areas of high nature conservation value are small and fragmented, reducing their viability. It has long been recognised (eg 'Making space for nature' 2010 GOV.UK (www.gov.uk) that establishment of coherent ecological networks to join up fragmented wildlife sites is crucial to restore nature and improve its resilience. We therefore **recommend** that Policy RSA 4 specifically sets out an objective to restore nature by establishing coherent ecological networks within the Parish.

Furthermore we **recommend** that the policy should specifically make reference to safeguarding and enhancing Priority Habitats and Species as listed within The Natural Environment and Rural Communities (NERC) Act 2006.

Please contact us if you need any further advice or clarification.