

Felicia Blake

From: Michael Pingram
Sent: 26 February 2020 14:12
To: PlanningPolicy
Cc: John Lawson
Subject: Ipswich Borough Council 2019 Local Plan Final Draft Consultation - Representations submitted by LPP on behalf of ESNEFT - Ipswich Hospital Campus, Heath Road, Ipswich
Attachments: ESNEFT Local Plan Final Draft Comments 26.02.20.pdf; LPP application form to LPA - 26-02-20.pdf

Dear Sirs,

Please find attached representations to the Ipswich Borough Council Local Plan Final Draft consultation, submitted by Lawson Planning Partnership Ltd, on behalf of our client East Suffolk and North Essex NHS Foundation Trust (ESNEFT).

A hard copy of this submission has been sent to the Council in today's post.

We trust that these representations will be taken into consideration in the preparation and drafting of the next stages of the Local Plan Review.

Should you have any queries, please do not hesitate to contact me on the details provided and I would be grateful if you could please confirm receipt of this email and attachments.

Kind regards,

Michael Pingram BA (Hons), MSc
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@LawsonPlanning



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Public Consultation for the Ipswich Local Plan Review Final Draft

15th January 2020 – 2nd March 2020

Planning and Compulsory Purchase Act 2004

**Town & Country Planning (Local Planning) (England) Regulations
2012 (Regulations 19)**

Consultation Comments Form

e-mail: planningpolicy@ipswich.gov.uk



**IPSWICH
BOROUGH COUNCIL**

**Planning Policy Team
Planning and Development
Ipswich Borough Council
Grafton House
15-17 Russell Road
Ipswich
IP1 2DE.**

website:
www.ipswich.gov.uk

Consultation document(s) to which this comments form relates:	Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review – Final Draft
Please return this comments form to:	planningpolicy@ipswich.gov.uk or Planning Policy Team Planning and Development Ipswich Borough Council Grafton House 15-17 Russell Road Ipswich IP1 2DE
Return by:	11.45pm Monday 2nd March 2020
This form has two parts:	Part A – Personal details
	Part B – Your comment(s).

PART A PERSONAL DETAILS		
	1. Personal details	2. Agent's details (if applicable)
Title	See Agent's details	Mr
First name		Michael
Last name		Pingram
Job title (<i>where relevant</i>)		Planner
Organisation (<i>where relevant</i>)		Lawson Planning Partnership Ltd
Address (<i>Please include post code</i>)		882 The Crescent Colchester Business Park Colchester Essex CO4 9YQ
E-mail		
Telephone No.		

PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation (and client if you are an agent):	Agent - Lawson Planning Partnership Ltd Client – East Suffolk and North Essex NHS Foundation Trust (ESNEFT)
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Please specify which document(s) and document part you are commenting upon.

Representations at this stage should only be made in relation to the legal compliance and the soundness of the Ipswich Local Plan Review Final Draft.

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Policy CS19	Please see enclosed LPP letter dated 25 th February 2020
Paragraph 8.229	Please see enclosed LPP letter dated 25 th February 2020
Paragraph 8.230	Please see enclosed LPP letter dated 25 th February 2020
Policy CS17	Please see enclosed LPP letter dated 25 th February 2020
Table 8B (Community Facilities)	Please see enclosed LPP letter dated 25 th February 2020

Please ensure that Part B of your form is attached to Part A and return both parts to the Council's Planning Policy Team by 11.45pm on Monday 2nd March 2020.

RECEIVING NOTIFICATION OF THE PROGRESS OF THE LOCAL PLAN

Would you like to be notified of the progress of the Ipswich Borough Council Local Plan Review at any of the following stages? Tick to confirm.

- | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|
| The submission of the Publication Draft Ipswich Local Plan Review to the Secretary of State for Communities and Local Government for independent examination. | ✓ |
| Publication of the Planning Inspector's Report on the Ipswich Local Plan Review. | ✓ |
| Adoption of the Ipswich Local Plan Review. | ✓ |

PRIVACY NOTICE

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

As part of our public task, we will process your comment, and store your information securely. Your comment and name will be made public as it will form part of the evidence base used to inform the creation of planning policy documents, but we will not publish your email address, contact address or telephone number.

Please note that we are required to provide your full details to the Planning Inspector and Programme Officer for the purposes of producing the development plan in accordance with the statutory regulations on plan making.

The above purposes may require disclosure of any data received in accordance with the Freedom of Information Act 2000. We will use this information to assist in plan making and to contact you regarding the planning consultation process.

Planning Policy Manager
Ipswich Borough Council
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IP1 2DE

Tel 01206 835150

Co. Reg. No. 5677777

25th February 2020

Dear Sirs

Ipswich Local Plan Final Draft (January 2020) – Representations on behalf of East Suffolk and North Essex NHS Foundation Trust (ESNEFT) concerning Ipswich Hospital Campus, Heath Road, Ipswich

On behalf of our client East Suffolk and North Essex NHS Foundation Trust (ESNEFT), we write to provide our representations on the final draft Local Plan for your consideration. These representations build on our previous submissions dated 25th July 2017 and 13th March 2019 concerning the Local Plan, 'Call for Sites consultation (June – July 2017)' and the Local Plan Review Preferred Options consultation (November 2018), submitted on behalf of Ipswich Hospital NHS Trust, which in 2017/18 merged with Colchester Hospital University NHS Trust to form ESNEFT.

Summary

In summary, the representations are based on the NPPF's soundness tests and seek recognition that it is a statutory function of ESNEFT to provide acute health care services, which goes beyond the remit of the Council as Local Planning Authority. The representations also seek acknowledgement of ESNEFT's most up to date position concerning the related development strategy for the Heath Road Hospital campus and a small but important number of policy revisions to reflect this situation is also requested for consistency. Finally, it is also requested that acute inpatient and outpatient facilities are added to the list and definition of community facilities, concerning potential recipients of developer infrastructure contributions.

Background

Following the merger of the two hospital trusts, ESNEFT is undergoing a Sustainability Transformation Plan (STP) to determine how acute hospital healthcare provision will be provided at each location. In addition, as part of a national initiative promoted by NHS England, acute hospital trusts are required to provide early delivery of additional inpatient bed spaces, which for Ipswich will support growth and resilience across the local health economy.

As part of these processes, significant investment in healthcare facilities and services is and will be taking place, to meet the requirements of the existing and future catchment population brought about in part by planned new housing growth included in the Local Plan. The provision of a new Emergency Department and Urgent Treatment Centre, which gained planning permission in 2019, is a key example of such investment and is due

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to be implemented in 2020/21. To help deliver the STP and associated level of development linked with acute healthcare provision, a planning policy basis is required to provide for a suitable level of flexibility and certainty within which the Trust may bring forward its investment and development plans through planning applications.

Key Planning Policy Issues & Revisions Sought

With the above background and NPPF soundness tests in mind, our representations focus on the wording of final draft policies CS19: Provision of Health Services and CS17: Delivering Infrastructure, and the related supporting text.

CS19: Provision of Health Services

This policy provides the basis for determining planning applications for development at the Ipswich Hospital Campus on Heath Road. At present, the policy seeks to 'safeguard' the hospital site for health and ancillary uses and refers to the provision of a site-wide masterplan to accompany related planning applications. Whilst there is no objection to a masterplan approach which reflects ESNEFT's Intentions, the inclusion of the word 'safeguards' is unnecessarily restrictive and inflexible.

As a statutory health authority and acute service provider, ESNEFT requires further flexibility in how it plans and develops the Hospital site, which in addition to the range of health care and ancillary uses listed below, may also include non-health care provision, should land become surplus to health care requirements over the 15 year plan period. Again, to allow for further flexibility, the inclusion of 'other ancillary uses' should be added to the policy as suggested.

Therefore, it is considered that the Policy as currently drafted would not; enable sufficient flexibility to enable ESNEFT to realise its development requirements, reflect related legal or procedural requirements, or reflect the most appropriate strategy for the site. Therefore, as currently drafted these parts of the plan are contrary to the tests set out in paragraph 35 of the NPPF.

However, it is acknowledged that development proposals for the hospital site should be considered in the context of a masterplan and suitable transport and parking strategy, which ESNEFT is currently preparing.

Consequently, small but important revisions to Policy CS19 have been suggested, which would provide further flexibility by removing the overly restrictive safeguarding requirement and allowing for a wide range of health care and ancillary uses across the site. The revised policy wording also allows for potential and appropriate non-health care uses to come forward providing they would be consistent with ESNEFT's health care strategy and masterplan for the site as a whole.

Policy CS19: Provision of Health Services

The Council supports the development of healthcare related facilities at the Heath Road Hospital Campus as identified on the policies map. Related uses may include:

- Further inpatient and outpatient accommodation and facilities
- Staff accommodation;
- Residential care home;
- Intermediate facilities;
- Education and teaching centre;

- Therapies centre; and
- Other ancillary uses.

Proposals for new and improved healthcare, ancillary facilities and other compatible development at Heath Road Hospital Campus will be supported providing they form part of the Hospital Trust's Estate Strategy for the provision of healthcare facilities, consistent with an overall site wide masterplan prepared by the Trust and associated Transport Strategy including suitable travel plan measures and parking provision.

It is also requested that the last sentence of the supporting text within Paragraph 8.229 is deleted as it covers healthcare matters that go beyond the scope of the Local Planning Authority's remit. Additional sentences are requested to demonstrate examples of the other ancillary uses referred to above.

Requested revision to paragraph 8.229:

The Heath Road Hospital is a strategic health facility serving Ipswich and the surrounding area. It is important that any rationalisation of uses there takes place in the context of a planned strategy for healthcare provision which itself takes account of the future growth of Ipswich and the Ipswich Strategic Planning Area. The policy allows for a range of healthcare and other compatible uses, including staff support services to assist with recruitment and retention. Additional ancillary uses may also include shared facilities to deliver a mutual benefit to other public sector organisations aligned with the one public estate agenda.

The supporting text also needs to be amended to link any parking issues to those directly associated with proposed hospital activity related to specific developments, rather than any parking issues that may be occurring in the area generally.

Requested revision to paragraph 8.230:

It is also essential that the travel implications of specific hospital related developments are fully considered and measures are put in place to encourage the use of sustainable modes where practicable by staff, out-patients, and visitors. In particular, measures should tackle parking issues in surrounding residential areas associated with proposed Hospital activity and the Hospital should put in place monitoring to ensure that any measures are proving to be effective.

CS17: Delivering Infrastructure

This policy provides the basis for obtaining developer contributions towards essential infrastructure provision. It is noted that health and emergency services are again referred to, although there is no specific reference to acute hospital facilities. Therefore, for completeness, the following additions to the Policy and supporting text are requested.

Point 3 on page 98 – amend to read;

3. health including acute care and emergency services.

Bullet point 7 on page 98 – amend to read;

- **community facilities including GP surgeries, health centres and key acute inpatient and outpatient facilities;**



Page 203 – list of strategic infrastructure facilities. Under 'Community facilities' add the following to the description of facilities

Improved acute and general healthcare provision at Heath Road Hospital

We trust you will find our representations to be helpful as part of the local Plan review process and please contact us if you require further clarification.

Yours faithfully

-

Lawson Planning Partnership Ltd

cc ESNEFT