

Felicia Blake

From: Grahame Stuteley
Sent: 28 February 2020 15:36
To: PlanningPolicy
Subject: Public consultation for the Ipswich Local Plan Review Final Draft (February 2020) - submission of representation for Turret Lane
Attachments: ipswich Borough Council Local Plan final draft comments form - Turret Lane representation.pdf; 200228 Turret Lane representation letter and plan - final.pdf

Dear Sirs

On behalf our client, Mr Norman Agran, please find attached our submission for your consideration as part of the February 2020 consultation for the Ipswich Local Plan Review (Final Draft). Our submission is made in support of land at Turret Lane, Ipswich. Our representation contains a letter, a completed copy of the Response Form and a Site Location Plan showing the extent of the land within our client's ownership.

I trust this is helpful and I would be most grateful if you could acknowledge receipt of this email for my records.

Thank you.

Regards



Grahame Stuteley BSc (Hons) MSc MRTPI
Senior Planner

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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

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:	Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Site Sheets Part 1- IP003 – IP067a & b; Final Draft Local Plan Review Policies Map IP-One Area Inset;
Please return this comments form to:	<u>planningpolicy@ipswich.gov.uk</u> 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		Mr
First name		Steven
Last name		Butler
Job title (<i>where relevant</i>)		Associate
Organisation (<i>where relevant</i>)		Bidwells LLP
Address (<i>Please include post code</i>)		Bidwell House Trumpington Road Cambridge CB2 9LD
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):

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.)
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft	<p>Please refer to the appended Turret Lane representation letter dated 28/02/2020. This relates to:</p> <p>(P.23) Policy SP2 'Land Allocated for Housing' (Table 1 - Land allocated for residential use or residential-led mixed use) – reference IP054b.</p> <p>(P.48) Chapter 5: 'IP-One Area' – reference 5.5 regarding Turret Lane allocations.</p> <p>(P.58) Policy Sp15 'Improving Pedestrian and Cycle Routes' – reference key walking routes from Waterfront to the Central Shopping Area (via Turret lane).</p>
Site Sheets Part 1- IP003 – IP067a & b;	<p>Please refer to the appended Turret Lane representation letter dated 28/02/2020. This relates to:</p> <p>IP054b (Land allocated for Residential Use).</p>
Final Draft Local Plan Review Policies Map IP-One Area Inset;	<p>Please refer to the appended Turret Lane representation letter dated 28/02/2020. This relates to:</p> <p>IP054b (Redevelopment will be dependent on the Intentions of existing businesses).</p>

PART B CONTINUED – Comments about 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.)

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.



BIDWELLS

Your ref: Ipswich Local Plan Review Final Draft Consultation
Our ref: SB/LPRrepFeb20
DD:
E:
Date: 28 February 2020

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

Dear Sir or Madam

**PUBLIC CONSULTATION FOR THE IPSWICH LOCAL PLAN REVIEW FINAL DRAFT FEB 2020 –
REPRESENTATION IN RELATION TO PROPOSED ALLOCATION IP054B – LAND BETWEEN OLD
CATTLE MARKET AND STAR LANE**

On behalf of our client, Mr Norman Agran, please find our submission enclosed in support of land at Turret Lane, Ipswich, IP4 1DL. Our submission contains a completed copy of the Response Form and a Site Location Plan showing the extent of the land within our client's ownership. Our client currently owns 9 commercial units within proposed residential site allocation IP054b within the 'IP-One Area' of Ipswich. The extent of the landownership is shown on the accompanying Site Location Plan.

The adopted Local Plan designates the IP054b area for commercial and/or residential uses, but the Final Draft Local Plan proposes the IP054b area solely for residential use – as shown on the proposals map extract at Figure 1 overleaf. We have no objection to the continued residential allocation, but we object to the proposed removal of the existing commercial allocation.

NPPF paragraph 11 states that *'plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change.'* Given that the proposed policy approach to IP054b does not reflect the current land uses, we consider that the policy is too rigid, not sufficiently flexible, inconsistent with national planning policy and therefore unsound.

The site area for proposed allocation IP054b is highlighted in the Ipswich Economic Area Employment Land Supply Assessment (Lichfields, April 2018) which states *'Site is in B1c (light industrial) use which is considered suitable for the site and location, as well as other B1 uses'* (Appendix 2, p.58), and the Council's site assessment sheets *'Site Sheets Part 1- IP003 – IP067a & b'* acknowledge the existing uses at the site, stating that *'Redevelopment will be dependent on the intentions of existing businesses'*.

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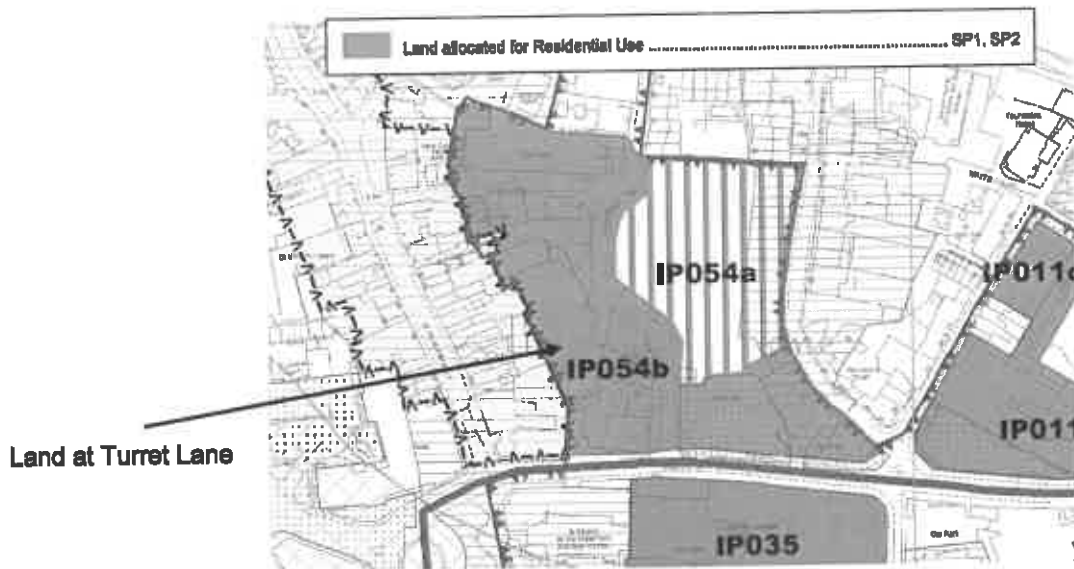


Figure 1: extract from the Final Draft proposals map, showing the area proposed for residential allocation under policy IP054b

Proposed allocation IP054b encompasses several units which have established commercial, employment and associated supporting uses. Whilst we recognise the emerging Local Plan's aspiration to maximise opportunities to deliver housing on suitable sites, with particular focus on brownfield land in town centre locations that are sustainably located, we consider that the IP054b allocation requires greater flexibility allowing for the continuation of existing established uses. Paragraph 80 of the NPPF 2019 states that *'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.'* Future development proposals within the allocated area should not be restricted solely to residential use as this would result in the existing business units being restricted should they wish to expand their current operations within our client's land holding.

We therefore request that the Council employs a more flexible approach in this regard and we suggest that the allocation reverts to its existing flexible residential and/or commercial uses.

The adopted Local Plan currently includes such flexibility and we consider that this should be maintained through the emerging Local Plan process and reflected in the explanatory text for this proposed allocation. I trust this letter sufficiently explains our position in reference to proposed allocation IP054b, as we support a residential use, however consider that this should also include B1 commercial uses as stated.

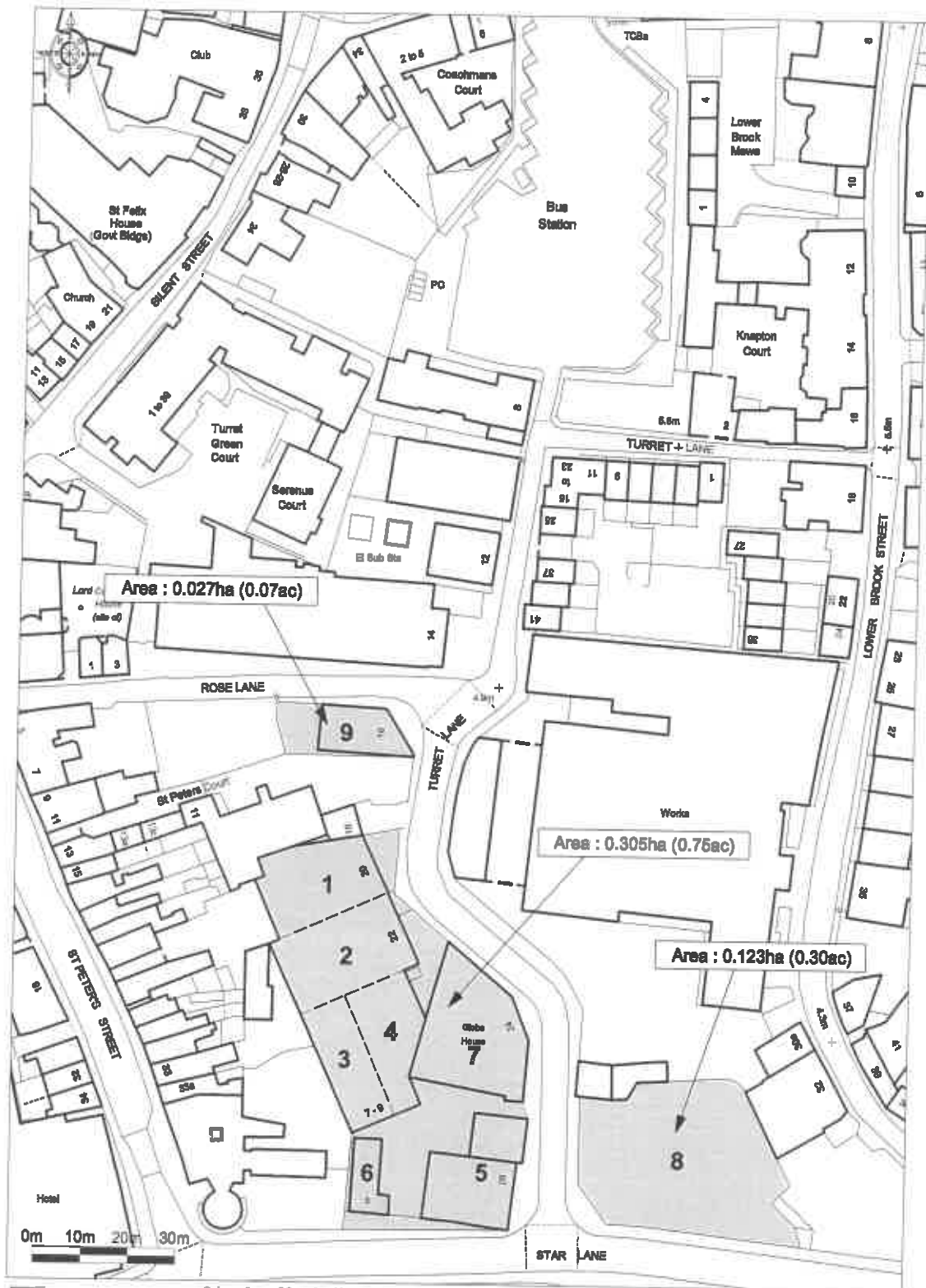
If you require further details regarding the contents of this letter, then please get in touch to discuss.

Yours faithfully

Steven Butler
Associate, Planning

Enclosures Consultation Comments Form, Site Location Plan

Norman Agran - Ipswich Properties



Ordnance Survey © Crown Copyright 2010. All rights reserved.
License number 100020446, Printed Scale - 1:1250

Drawing Number: A.39,654
O.S. Ref: TM 1644
Date: 3/11/2010

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