

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



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Consultation document(s) to which this comments form relates:	Ipswich Local Plan Review – Submission version and associated evidence base.
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		
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PART B Comment(s) about the Ipswich Local Plan Final Draft Consultation

Your name or organisation (and client if you are an agent):	Gladman Developments
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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.)
Local Plan – Submission version	Please see attached representations. Gladman would also like to request to participate at the hearing sessions at the Examination in Public to discuss the issues raised.

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. x
- Publication of the Planning Inspector’s Report on the Ipswich Local Plan Review. x
- Adoption of the Ipswich Local Plan Review. x

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.

Ipswich
Local Plan Review
Publication Draft Plan



February 2020

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1 INTRODUCTION

1.1 Context

1.1.1 These representations are submitted by Gladman in response to the Ipswich Local Plan Review (ILPR) Publication Draft consultation.

1.1.2 Gladman has considerable experience in the development industry across a number of sectors including residential and employment development. From that experience, we understand the need for the planning system to ensure that residents have access to the homes and employment opportunities that are required to meet future development needs of the area and contribute towards sustainable economic development.

1.1.3 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure. Gladman also has a wealth of experience in contributing to the development plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of that experience that the comments are made in these representations.

1.1.4 Through this submission, Gladman have highlighted areas where the Local Plan's policies require further clarity or justification in order to be found sound at Examination, namely the need for an effective approach to cross boundary strategic issues. As such, Gladman formally request that we are afforded the opportunity to discuss the issues raised at the Local Plan examination public hearing sessions.

1.2 Structure of representations

1.2.1 These representations are structured to follow the consultation document where possible and will cover the following key topic areas:

- National Planning Policy and Guidance
- Legal Compliance – Duty to Cooperate and Sustainability Appraisal
- Housing delivery and detailed policies

1.2.2 In addition, Gladman have provided details of two strategic sites that we are promoting to the neighbouring districts of Babergh and East Suffolk within Section 6 below. Both sites are ideally located to assist Ipswich Borough in meeting its development needs over the plan period through joint working with its neighbouring districts under the Duty to Cooperate.

1.3 Plan Making

1.3.1 The NPPF19 sets out the four tests which a Local Plan must meet to be considered sound:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with National Policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

1.4 Overview of Soundness

1.4.1 Given that this is the Publication Draft of the ILPR it is of critical importance to consider these tests and whether the proposed policies and allocations would be meeting these at the point that the plan is examined. Due to the issues raised through this submission and summarised in Table 1 below, Gladman consider it necessary that we are given the opportunity to discuss our representations further at the Examination in Public in due course.

Policy	Sound / Unsound / Comment	Test of Soundness	Reason
Policy CS2 – Location of development	Unsound	Justified, effective, positively prepared and consistent with national policy	This policy fails to fully reflect and address the wider strategic priorities. The Local Plan strategy must be revisited so that it addresses unmet housing needs arising from the Borough.
Policy CS7 – Housing requirement	Unsound	Justified, effective, positively prepared and consistent with national policy	The policy fails to succinctly set out how the LPAs within the ISPA will ensure housing needs will be met in full over the plan period. The stepped trajectory is not soundly based as it will delay the delivery of housing needs.
Policy CS10 – Ipswich Garden suburb	Comment	Justified, effective, positively prepared and consistent with national policy	The Council and its neighbouring authorities have failed to consider alternative sustainable growth opportunities to meet unmet housing needs over the plan period.
Policy CS12 – Affordable housing	Unsound	Justified, effective, positively prepared	The level of affordable housing to be delivered by this policy will fail to meet the affordable housing needs of the Borough.

		and consistent with national policy	
Policy CS13 – Economic development	Unsound	Justified, effective, positively prepared and consistent with national policy	The Local Plan needs to promote a strategy which encourages economic development.

Table 1

2 NATIONAL PLANNING POLICY

2.1 Revised National Planning Policy Framework

- 2.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the revised National Planning Policy Framework (NPPF18). This publication formed the first revision of the Framework since 2012 and implemented changes informed by the housing white paper (2017)¹, the 'Planning for the right homes in the right places' consultation (2017) and the draft NPPF (2018) consultation.
- 2.1.2 The 2018 version of the NPPF was itself superseded on 19th February 2019, with the latest version amending policy regarding Appropriate Assessment, as well as other minor clarifications to wording. These representations have been prepared on the basis of the revised NPPF (NPPF19) and unless otherwise stated any NPPF references are in relation to the 2019 version of the national policy.
- 2.1.3 The revised Framework introduces a number of major changes to national policy. The changes reaffirm the Government's commitment to ensuring up-to-date plans are in place which provides a positive vision for the areas they cover. These should outline the housing, economic, social and environmental priorities to help shape future local communities. In particular, paragraph 16 of the NPPF states that Plans should:

“be prepared with the objective of contributing to the achievement of sustainable development;

be prepared positively, in a way that is aspirational but deliverable;

be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

be accessible through the use of digital tools to assist public involvement and policy presentation; and

¹ Department for Communities and Local Government. (2017). 'Fixing our broken housing market'. Available at: <https://www.gov.uk/government/publications/fixing-our-broken-housing-market/>.

serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

2.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can come forward where it is needed and that the needs of groups with specific housing requirements are addressed and land with permission is developed without unnecessary delay.

2.1.5 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. It states:

"Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and**
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."**

2.1.6 Once a local planning authority has identified its housing needs, these needs should be met in full, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and AONB and giving consideration as to where or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b). Local planning authorities should seek to achieve each of the economic, social and environmental dimensions of sustainable development, resulting in net gains across all three. Adverse impacts on any of these dimensions should be avoided but where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed or, where this is not possible, compensatory measures should be considered.

2.2 Planning Practice Guidance

2.2.1 The Planning Practice Guidance (PPG) provides additional guidance to be read alongside the NPPF. Numerous updates have been made to the PPG in September 2018 to reflect the changes in approach

brought through the revised NPPF. Further changes have been made to the PPG throughout 2019. Relevant references from the guidance contained in the PPG are made within this submission.

3 LEGAL REQUIREMENTS

3.1 Sustainability Appraisal

- 3.1.1** In accordance with Section 19 of the Planning and Compulsory Purchase 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).
- 3.1.2** The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the ILPR proposals on sustainable development when judged against all reasonable alternatives. The Council must ensure that the future results of the SA clearly justify its policy choices. In meeting development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. This must be undertaken through a comparative and equal assessment of all reasonable alternatives, in the same level of detail for both chosen and rejected alternatives. The Council's decision making, and scoring should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often the SA process flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.
- 3.1.3** In accordance with the SEA Regulations, the Council must take account of all reasonable alternatives when assessing and selecting their preferred policy choice. It is integral to this process that each reasonable alternative is assessed to the same degree of detail as the authority's preferred option and should only be rejected after a fair and comparable assessment of its sustainability credential.

3.2 Duty to Cooperate

- 3.2.1** The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.
- 3.2.2** The NPPF (2018) had introduced a number of significant changes on how local planning authorities are expected to cooperate, including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The NPPF (2019) sets out that local planning authorities should produce, maintain and update

-
- one or more SoCG throughout the plan making process. The SoCG should provide a written record of the progress made by the strategic plan making authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the lengths local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with i.e. unmet housing needs.
- 3.2.3** As demonstrated through the outcome of the St Albans Local Plan examination, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This legal test cannot be rectified through modifications.
- 3.2.4** Gladman recognise that the DtC is a process of ongoing engagement and collaboration as set out in the PPG it is clear that the Duty is intended to produce effective policies on cross boundary strategic matters. In this regard, the Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint work arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation to ensure that the borough's housing needs are met in full.
- 3.2.5** Any issues of unmet housing need arising from relevant neighbouring local authorities must be fully considered through the preparation of the Local Plan, working under the auspices of the DtC and agreements and evidenced through SoCG. To achieve this, it is vital that this matter is carefully explored through joint working with all other local planning authorities within the HMA, together with any other relevant local authorities that the HMA has a clear functional relationship with. Where necessary, a strong policy mechanism will be required within the Local Plan to demonstrate that unmet housing needs arising from relevant neighbouring authorities and those with a clear functional relationship will be met during the plan period.
- 3.2.6** In light of the above it is noted that the starting point in the wider strategic planning area (covering East Suffolk, Mid Suffolk District Council and Babergh District) is for local authorities to meet their own housing needs within their own boundary. However, the ability of Ipswich Borough to meet its development needs in full over the plan period requires the commitment of neighbouring authorities to assist in meeting its housing needs due to the nature of the administrative boundary.
- 3.2.7** It is recognised that the local authorities of Babergh, Mid Suffolk, Suffolk Coastal, Ipswich and Suffolk County signed a MoU in June 2016, which sought to ensure an approach whereby strategic local planning policy becomes consistent across the local authority areas. The proposed approach formed a useful starting point in ensuring that strategic priorities across the local authority boundaries can be properly coordinated and clearly reflected in a joint Local Plan or through aligned Local Plans. Gladman recognise that collaborative work has been undertaken between the Council and its

neighbouring authorities during the plan making process. A series of MoUs and SoCGs have been published during the course of plan's preparation. Paragraphs 25 and 26 of the Framework state that:

“25. Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans...

26. Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs cannot be met wholly within a particular plan area could be met elsewhere.”

3.2.8 This element of national policy is pertinent to the production of local plans across the area that is covered by the Ipswich Strategic Planning Board because they embrace shared growth and infrastructure delivery ambitions and priorities for the 'Wider Strategic Planning Area'. Having identified shared strategic matters, there is a need to address these through individual local plans in partnership. It therefore follows that strategic priorities must be fully embraced and supported through the spatial strategies of the local plans that are brought forward by individual authorities and through the associated decision-making processes that inform the Plan's preferred spatial development options. In its current form, the ILPR fails to achieve this because it does not form a strategy that will provide the necessary certainty that is needed to ensure that the minimum housing requirement across the Ipswich Housing Market Area can be achieved in full over the plan period. From the outset of the plan making process, the local authorities within the ISPA have been aware of the issue relating to the unmet needs arising from Ipswich over the plan period. Whilst it is unfortunate that the timescales for the production of the ILPR have fallen behind that of neighbouring authorities, the issue of unmet housing needs arising from Ipswich will still need to be considered at the Local Plan Examination. The need to address this issue goes to the heart of soundness of the Plan and its effects on the wider IPSA. Indeed, there are practical and sustainable options available to be considered in neighbouring authorities that can accommodate housing needs over the plan period in a sustainable manner, which can support wider infrastructure improvements, including at key junctions on the A14 which is an important cross boundary issue.

3.2.9 Whilst collaboration between the IPSA authorities has occurred it has not resulted in effective and concrete outcomes to ensure the housing needs of the HMA will be delivered in full. This issue will be explored in greater detail in section 4 of these representations.

4 IPSWICH LOCAL PLAN REVIEW

4.1 Context

4.1.1 This section is in response to the ILPR consultation document and its supporting evidence base. Gladman highlight below concerns and set out where we feel modifications will need to be made for the plan to be found sound.

4.2 Policy CS1: Sustainable Development

4.2.1 In principle, Gladman are supportive of the direction taken in Policy CS1, which sets out that decisions will be made in accordance with the presumption in favour of sustainable development and affirms the Council's commitment to making local planning decisions based on the delivery of sustainable development. The inclusion of such a policy provides assurance of a local approach to planning that will actively seek to improve the social, environmental and the economic wellbeing of the area by ensuring that development demonstrably contributes to the delivery of sustainable development within the Borough.

4.2.2 Notwithstanding this, Gladman believe that the policy should go further in its approach to ensuring the delivery of sustainable development is consistent with a localised approach to assessing development proposals in line with the ethos of achieving the delivery of sustainable development as required by the NPPF2019 which is key to assessing planning proposals and should be reflected in the policy wording linked to the vision and objectives of the Plan. In this regard, Gladman refer to the Sustainable Development Statement contained in the draft Durham Local Plan currently subject to examination. This is an effective example of a local approach of how development proposals will be considered against the presumption outlined in national policy. It is recommended that similar criteria that are relevant to Ipswich be included in the policy wording to demonstrate how a localised approach will be taken through the development management process.

4.3 Policy CS2: The Location and Nature of Development

4.3.1 Policy CS2 sets out the Council's approach to regeneration and the sustainable growth of Ipswich will be achieved by a variety of measures. These include, but are not limited to, regeneration areas, the allocation of sites at the northern end of Humber Doucy Lane phased in alignment with the delivery of the Ipswich Garden Suburb subject to the provision of suitable infrastructure. In addition, it is noted that Policy CS2 requires the local planning authority to work with neighbouring authorities to address housing need and delivery within the Ipswich housing market area.

- 4.3.2 In principle, Gladman approve of the recognition within Policy CS2 for the Council to work with neighbouring authorities to address housing need and delivery within the Ipswich HMA. However, it is concerning that the Plan fails to provide a positive and effective mechanism to ensure the delivery of the HMA's housing needs in full. Indeed, this issue was recently highlighted in the Inspector's Post Hearing letter to the Suffolk Coastal Local Plan which specifically states that the Plan should be amended to include an immediate review of the Plan or relevant strategic policies, which would be triggered at the point where it is established through the adoption of a development plan that there is unmet needs arising in a neighbouring authority area in the HMA.
- 4.3.3 It is considered that the proposed approach as submitted risks the deliverability of the Plan through the stepped housing trajectory and the reliance on a Sustainable Urban Extension to north Ipswich which is heavily reliant on the provision of new and improved infrastructure. These issues are discussed in detail in section 4.4 below.

4.4 Policy CS7: The Amount of New Housing Required

Background

- 4.4.1 Policy CS7 of the adopted Ipswich Core Strategy sets out an interim housing target of 9,777 dwellings over the period 2011-2031 i.e. 489dpa. At the time of the adoption of the Core Strategy and Site Allocations DPD, the Council was unable to demonstrate a five year housing land supply in the context of paragraph 47 of the NPPF 2012. Due to the constrained nature of the borough's administrative boundary the Council was required to review its Local Plan in order to review objectively assessed needs for housing, employment land and new retail floorspace in the short term working in partnership with neighbouring authorities under the auspices of the Duty to Cooperate to ensure the HMA's housing needs are met in full over the plan period.

Housing Requirement

- 4.4.2 Policy CS7 of the emerging Local Plan seeks to deliver a housing requirement of at least 8,010 dwellings over the period 2018 to 2036. This equates to an annual average of at least 445 dwellings per annum a figure which is significantly less than the adopted Core Strategy housing requirement. However, the housing target is significantly reliant on the Ipswich Garden Suburb and Ipswich One area which allocates land for approximately 3,500 dwellings.
- 4.4.3 The housing figure contained in the emerging ILPR is derived from the Government's Standard Method. However, the PPG is clear that the need figure generated by the standard method should only be considered as the minimum starting point in establishing a housing requirement figure as it does not take into consideration matters which will influence demographic behaviour such as

economic growth strategies, affordable housing needs, strategic level infrastructure etc. which are likely to increase housing needs.

- 4.4.4 The supporting text to this policy states at paragraph 8.106 that the Council does not consider that it should plan for a higher level of housing need than the standard method suggests. However, the adopted Core Strategy and the options considered as part of the SA demonstrate the Council could plan for a higher level of housing need than the standard method suggests. In addition, we would question how the proposed housing requirement has been aligned with the Council's economic growth agenda given that the Plan's vision and objectives seek to boost economic diversity across the Borough.

Stepped Trajectory

- 4.4.5 The Council is seeking to 'step' the annual housing requirement as follows:

- From April 2018 – March 2024 – 300dpa (i.e. 1,800 dwellings)
- From April 2024 – March 2036 – 518dpa (i.e. 6,216 dwellings)

- 4.4.6 The PPG² is clear that a stepped housing requirement may only be appropriate where there is a significant change in the level of housing requirement between emerging and previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period.

- 4.4.7 Although the Council state that Ipswich Garden Suburb will deliver later in the plan period the PPG further states that that policy-makers should set out evidence to support a stepped approach and are not seeking to unnecessarily delay meeting identified development needs. With that being said, Ipswich has a historic under-delivery of housing against the adopted Core Strategy housing requirement of 489dpa, as detailed in table 2 below:

Year	Housing Completions	Affordable Housing Completions	Housing Completions within IP-One area
2011/12	283	152	51
2012/13	100	7	13
2013/14	228	44	117
2014/15	470	202	318
2015/16	496	133	237
2016/17	256	4	109

² Planning Practice Guidance Paragraph: 021 Reference ID: 68-021-20190722

2017/18	141	20	71
Total	1974	562	916

Table 2 – Housing Delivery Record In Ipswich. Source: Annual Monitoring Report 13 2017/18 June 2019

- 4.4.8** Measured against the adopted Core Strategy requirement of 489dpa, only in the 2015/16 monitoring year has that target been achieved. The IP-One area has delivered 46% of the homes in the Borough since 2011, some way off the 74% that the Council is relying on for the remainder of the Plan period. Even set against the lower emerging housing need of 445dpa, the Council's historic delivery does not suggest that the Borough's housing need will be delivered as they are relying on historic sites with known issues as a continuation of the existing spatial strategy. The Council's delivery record should have very clearly pointed the Council towards actively pursuing an alternative strategy to what is now being proposed and through the agreement to export housing needs to neighbouring areas in line with the requirements of national policy and guidance. Based on the Council's previous housing delivery, the Council needs to constructively work with its neighbours through their respective plan making process to ensure that housing needs (including affordable needs) of Ipswich can be met in full without unnecessary delay.
- 4.4.9** Furthermore, the historic completions data suggests that the Council's proposed stepped housing requirement will continue to delay meeting identified housing needs of the borough and therefore conflicts with the advice detailed in the PPG. Furthermore, a continued reliance on the IP-One area to deliver homes in Ipswich is unfounded and unrealistic and further distribution across the HMA is required.
- 4.4.10** Gladman note paragraph 8.151 of the ILPR that the Ipswich SHMA 2017 Part 2 Report identifies the total annual affordable housing need in Ipswich is 239 households per year, which represents 47.9% of the annual projected household growth in the Borough between 2014 and 2036 identified through the SHMA and around 50% of the need identified using the standard method. Through Policy CS12 the Council is seeking to secure 30% affordable housing on the new Garden Suburb and 15% in all other locations. The Council's housing requirement will therefore fail to meet the affordable housing needs of the borough. Gladman recommend that the stepped trajectory is deleted as it unnecessarily delays housing delivery, including affordable housing delivery.

4.5 Policy CS8: Housing Type and Tenure

- 4.5.1** In principle, Gladman support Policy CS8 as currently proposed which seeks to ensure an appropriate mix of homes by size and type is provided in accordance with the SHMA or any up to date evidence of local needs supported by the Council and the policies of the plan.

4.5.2 Notwithstanding this, it is noted that the Council will support the provision of Self-build/Custom build homes and on major applications will consider the currently applicable self-build register and whether provision should be included within the development proposal. This element of the policy lacks clarity on whether self-build plots should be provided on site. The Council's Self Build Register identifies 70 interested persons which does not indicate a strong demand for this form of housing.

4.5.3 Whilst it is supported that the Council should be seeking to encourage the delivery of this form of housing, it is recommended that this element of the policy is modified so it is at the discretion of the developer to provide self-build homes on site. Indeed, Gladman would not be supportive of an approach which requires all development to provide self-build homes as there are difficulties in terms of potential health and safety concerns and also the practical difficulties in terms of aligning their development with construction activity on the site.

4.6 Policy CS10: Ipswich Garden Suburb

4.6.1 Gladman notes the Council's continued approach to shape the delivery of the Ipswich Garden Suburb. In principle, Gladman has no objections to the allocation of a new settlement as outlined in the proposed policy wording. However, it is essential that the Council has considered all options available for development and it is essential that realistic delivery assumptions have been applied to the sites delivery. This issue is considered in more detail in section 5 of these representations.

4.7 Policy CS12: Affordable Housing

4.7.1 Gladman note the intention of this policy is to ensure a choice of homes is available to meet identified affordable housing needs in Ipswich. However, the Council's approach as currently proposed is not effective given the level of affordable housing needs within Ipswich will not be met over the plan period.

4.7.2 Gladman consider that the Council will need to proactively address this situation if it is to meet the housing market areas full housing needs. Indeed, paragraph 60 of the Framework is clear that in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. As such, it is essential that the Council allocate additional housing land to make a meaningful contribution to the Council's housing land supply and to boost affordable housing delivery. Gladman reiterate that this is an issue that will need to be informed through continued cross-boundary working with neighbouring authorities as this issue can be addressed through the allocation of sites within the vicinity of Ipswich within neighbouring districts such as the Orwell Green Garden Village.

4.8 Policy CS13: Planning for Jobs Growth

- 4.8.1** Policy CS13 seeks to promote sustainable economic growth in the Ipswich Strategy Planning Area. It is noted that the Council has updated its economic evidence as a result of the more recent East England Forecasting Model (EEFM) dataset being published. This has reduced the jobs growth from 15,580 jobs to 9,500 jobs over the plan period. Gladman consider the Plan should be aspirational and should be seeking to increase jobs growth as identified in the preferred options plan as a minimum in order to meet the visions and objectives of the Plan to increase economic activity and access to employment.

4.9 Policy DM4: Development and Flood Risk

- 4.9.1** Gladman note the Council's proposed approach to flood risk management that is set out through Policy DM4. Gladman remain concerned that the Plan is relying on the delivery of housing from a number of sites in high risk flood zones. The Council suggests that it has undertaken sequential and exception tests as required by the NPPF, but in accepting the needs of Ipswich will at least in part need to be met outside of the Town's constrained boundary, the Council should look to identify additional sites outside of its boundary in collaboration with neighbouring authorities that are more suitable for residential development than those that are at high risk of flooding within its boundary.

5 GENERAL MATTERS

5.1 Housing Delivery

5.1.1 Gladman note the Intention to allocate these sites within the Local Plan for residential use and associated community Infrastructure over the plan period. As evidence through the Report prepared by Planning Prospects on behalf of Gladman³, there are fundamental concerns regarding the ability of these sites to viably deliver residential development over the plan period and over whether there is a demand for the type of homes that these sites can offer.

5.1.2 Due to the constrained nature of the borough boundary, the Council recognises that it has limited capacity for future development and will need to look beyond its administrative boundaries working in collaboration with neighbouring authorities to ensure housing needs are delivered in full.

Housing Land Supply

5.1.3 Whilst Gladman welcome the decision to include a 10% contingency within the Council's housing land supply, it is not evident from the evidence provided in the Housing Topic Paper as to which sites within the Council's housing land supply will come forward within the next five years following the adoption of the Local Plan and whether these sites are subject to extant permissions or proposed allocations. Neither the Council's SHLAA nor the Housing Topic Paper provide the necessary detail as required by the NPPF 2019. As such, Gladman reserve the right to provide comments on this matter should additional evidence be provided.

Housing Delivery Strategy

5.1.4 In addition to the Ipswich Garden Suburbs, Policy SP2 of the Site Allocations Review provides site allocations that the Council anticipates will deliver 2,750 homes in the Plan period, a reduction from 3,297 homes that were set out in the same policy in the Preferred Options Development Plan Review Documents published in November 2018. In addition, Policy SP3 highlights land with 'Land with planning permission or awaiting a Section 106 Agreement' It is noted that should the permissions fail to be issued or implemented and lapse during the plan period or the development fail to come forward or be completed in accordance with the permission, the Council will protect the sites for residential use or residential-led mixed use. Sites included within Policy SP3 account for 1,470 dwellings over the plan period.

³ See Gladman's representations to the Regulation 18 consultation – Appendix 1

- 5.1.5** Planning Prospects were instructed by Gladman to produce an assessment of the deliverability of residential sites put forward for allocation by Ipswich Borough Council in their Preferred Options Development Plan Review Documents published for consultation in November 2018.
- 5.1.6** Planning Prospects' analysis of the Council's suggested SP2 sites shows that there are many sites that cannot be relied upon to deliver homes over the emerging Plan period. For example, a number of the SP2 sites are unavailable and require existing occupiers to relocate and others are heavily constrained by designated heritage assets and areas of archaeological importance. These are significant constraints that impact the delivery of homes from these sites in principle.
- 5.1.7** Appendix 1 Planning Prospects' report details proformas for allocated sites within SP2 discussing deliverability and viability, before Appendix 2 provides a table detailing Site Indicative Deliverability Comparison between the Council's proposed figures and Planning Prospects' analysis. In March 2019 when this report was conducted it was evident that the sites were ineffectively assessed often assuming complete site coverage or very high densities without considering the amount of land required to avoid constraint impacts. Furthermore, the Council is relying on delivery from a number of sites in high flood risk zones which have significant viability and deliverability concerns.
- 5.1.8** Gladman contend that Ipswich Borough Council must look outside of the Borough's boundary to enable the town's housing need to be met and identify land outside of its boundary that are more suitable for residential development.
- 5.1.9** The notion that the housing strategy set out in the emerging Local Plan Review cannot be relied upon is exacerbated by the fact that a number of sites have been removed from Policy SP2 since the Preferred Options document published in 2018.
- 5.1.10** The sites listed in table 3 below were included within SP2 in the Preferred Options document but now have been removed or are no longer available for residential development.

Site Reference	Number of Dwellings	Planning Prospects Analysis	Current Status
IPO28a	11	Previous approved schemes have not been delivered. A large area of the site is in Flood Zones 2 and 3 (highest risk). There is no evidence to assume that an 11 unit proposal is viable and residential development is unsuitable in Flood Zones 2 and 3.	Not included in the latest version of the plan
IPO29	45	For this reason, the proportion of the site considered developable has been reduced	No longer included in the plan as available for

		from the 2017 Local Plan. A small area is at high risk of surface water flooding. The site also has potential wildlife interest. It cannot be assumed that the site can deliver 45 homes in light of the constraints identified.	residential development and is noted as an employment allocation in Policy SP6
IP346	88	This site is adjacent to the River Grippen. There appears to be existing occupiers which would need to be relocated. Availability of the site is unknown	The site is no longer included in the latest version of the plan.

Table 3- Sites removed from Policy SP2

- 5.1.11** A number of sites are now detailed within the Core Strategy Review Policy SP4 'Opportunity Sites' Four opportunity sites have been identified within IP-One that have potential for housing-led redevelopment and would contribute to the regeneration of the Waterfront and Town Centre. The Council will work with landowners and other interested parties to investigate opportunities and bring them forward through the development management process, taking into account constraints set out in the Appendix 4 site sheets.
- 5.1.12** Planning Prospects found that none of these sites were deliverable or viable. Significantly Site IP226 which has an indicative capacity of 337 dwellings, has a non-implemented application for 556 homes, been allocated but has not achieved any housing completions over the last 20 years, requires business relocation and lies entirely within Flood Zone 3. Given the site's history and constraints identified residential development cannot be assumed as suitable or viable.
- 5.1.13** The above information alongside Planning Prospects' report suggests that the Council's current and continued strategy for delivering homes is flawed. The Council by their own admission in removing sites from the Local Plan submission draft version have significant concerns over the viability and deliverability of numerous sites within the Core Strategy Review, which cannot be relied upon to deliver homes over the emerging plan period.
- 5.1.14** Therefore, the Council must look to identify significantly more sites, which are realistically deliverable and outside of the Borough's boundary to meet Ipswich housing needs.

Delivery Assumptions

- 5.1.15** The Council contend that the tight urban boundary to Ipswich Borough means that there is only one area of extensive greenfield land available on the periphery of the town and within the Borough. That land is the Ipswich Garden Suburb. Policy CS10 of the Core Strategy and Policies DPD Review Final

Draft states that the Ipswich Garden Suburb will incorporate residential development of approximately 3,500 dwellings.

5.1.16 The Ipswich Authority Monitoring Report 13 2017/18 (June 2019) housing trajectory sets out that the Council expect the Ipswich Garden Suburb to deliver homes at the following rate:

Year	Phase			Total
	Mersea	Crest Nicholson	Other Source	
2018/19	0	0	0	0
2019/20	0	10	0	10
2020/21	0	60	40	100
2021/22	45	90	75	210
2022/23	45	90	75	210
2023/24	45	90	75	210
2024/25	75	90	80	245
2025/26	75	90	75	240
2026/27	75	90	75	240
2027/28	75	90	75	240
2028/29	90	90	75	255
2029/30	90	90	75	255
2030/31	90	90	75	255
2031/32	90	90	65	245
2032/33	90	40	140	270
2033/34	90	0	125	215
Total	975	1,100	1125	3200

Table 1- Projected Ipswich Garden Suburb Delivery Rate. Source: Authority Monitoring Report 13 2017/18 June 2019

5.1.17 In total, the Council's AMR trajectory sets out that 3,200 homes will be delivered from the Ipswich Garden Suburb to 2034, leaving a residual requirement of 300 dwellings over the remaining two years of the plan period.

5.1.18 The PPG states that the advice of developers and local agents will be important in assessing lead in times and build out rates by year⁴, whilst previous versions of the PPG have suggested that Local

⁴ Planning Practice Guidance Paragraph: 022 Reference ID: 3-022-20190722

Authorities should consider the local delivery record when considering the future housing delivery assumptions.

- 5.1.19 Setting realistic delivery assumptions, including annual delivery rates and lead-in times for first completions to come forward, is necessary to project the number of homes that the sites identified by the Council can reasonably be expected to deliver both in the five year period and for the entire Plan period.
- 5.1.20 As discussed by Planning Prospects, historically Ipswich Borough has not delivered any large sites that are comparable to the scale proposed for the Ipswich Garden Suburb. Yet, the Council has no reasonable empirical evidence or experience to base their delivery assumptions for the Garden Suburb, or to critique any assumptions being made by its developers and promoters, the potential for planning harm from unrealistic delivery assumptions is increased.
- 5.1.21 Given that there is no evidence of delivery in Ipswich Borough from site scale comparable to the Ipswich Garden Suburb it is useful to refer to national evidence and average delivery rates. Planning Prospects assessed research undertaken by Lichfields in their 2016 'Start to Finish' report which includes an assessment of the average delivery rates of large housing sites across the UK. The Lichfields Report suggests that on sites of 2,000 or more dwellings, the average annual delivery rate is 171 homes per annum. Using this figure as a reasonable delivery assumption would significantly delay the delivery of housing at the Ipswich Garden Suburb in comparison to the Council's own trajectory.
- 5.1.22 Furthermore, in September 2019, Babergh and Mid Suffolk published their Housing Land Supply Position Statement⁵. Section 5 of this document provided analysis of national evidence on the delivery of housing using research documents and national housebuilder statements to inform average delivery rates nationally. Table 3 of this document details the average national delivery contained within these reports of sites of 500 dwellings or more, suggesting an average annual delivery rate of similar sized sites of approximately 150 dwellings.
- 5.1.23 The Ipswich Garden Suburb timescales for delivery within the latest AMR document have already been set back from the previous document published in 2018, this on its own evidences that the delivery assumptions for the Garden Suburb are over optimistic. It is strikingly clear that the Council's assumptions made in respect of the housing trajectory risks the deliverability of the Local Plan (and the Local Plan as a whole) and will inevitably lead to further housing land supply problems in the future. Table 4 below provides a comparison between the Council's position on the Garden Suburb at

⁵ Babergh Housing Land Supply Position Statement <https://www.babergh.gov.uk/assets/Strategic-Planning/AMR/Babergh-District-Council-Housing-Land-Supply-Position-Statement-Sep-2019.pdf>

the point of the Local Plan adoption and the evidence informing the submission version of the emerging ILPR. The Council’s position demonstrates a shift in the anticipated delivery rates and are now extended towards the end of the plan period.

Ipswich Garden Suburb	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	Total
Land west of Westerfield Road and South of Railway Line	0	0	1	105	105	105	100	100	100	100	75									815
Other locations North Ipswich	0	0	0	0	1	82	100	100	100	100	100	100	100	100	100	100	100	100	100	1000
AAR 2015 Total	0	0	1	105	106	187	200	200	200	200	175	299	299	170	150	150	150	150	150	2700
Mertes	0	0	0	0	0	0	40	40	40	40	75	75	75	75	75	75	75	75	75	815
Crest Hillside	0	0	0	0	10	60	90	90	90	90	90	90	90	90	90	90	90	90	90	1100
Other locations	0	0	0	0	0	40	70	70	70	70	75	75	75	75	75	75	75	75	75	1125
AAR 2019 Total	0	0	0	0	10	100	210	210	210	245	240	240	240	255	255	255	255	245	270	3200

Table 4: Ipswich Garden Suburb – delivery comparison

5.1.24 Additionally, given the above information on national evidence of housing delivery rates and that Ipswich Borough has not delivered any large sites comparable to the scale proposed for the Ipswich Garden Suburb, it is clear that realistic assumptions on the delivery of Ipswich Garden Suburb have not been applied.

Conclusion on housing delivery

5.1.25 The implications of applying a more realistic delivery assumption at the Ipswich Garden Suburb, alongside the concerns over the deliverability and viability of numerous SP2 sites evidences that the Council’s current and continued strategy for delivering homes is flawed.

5.1.26 Furthermore, through employing a stepped housing requirement, the Council is continuing to delay meeting the identified housing needs of the district and therefore conflicts with the advice detailed in the PPG.

5.1.27 Gladman assert that Ipswich Borough Council need to identify significantly more sites, which are realistically deliverable and viable to support the currently identified housing supply. It is evident that to ensure the Borough’s housing need can be met that the sites, including realistically deliverable strategic sites, outside of the Borough’s boundary, should be identified.

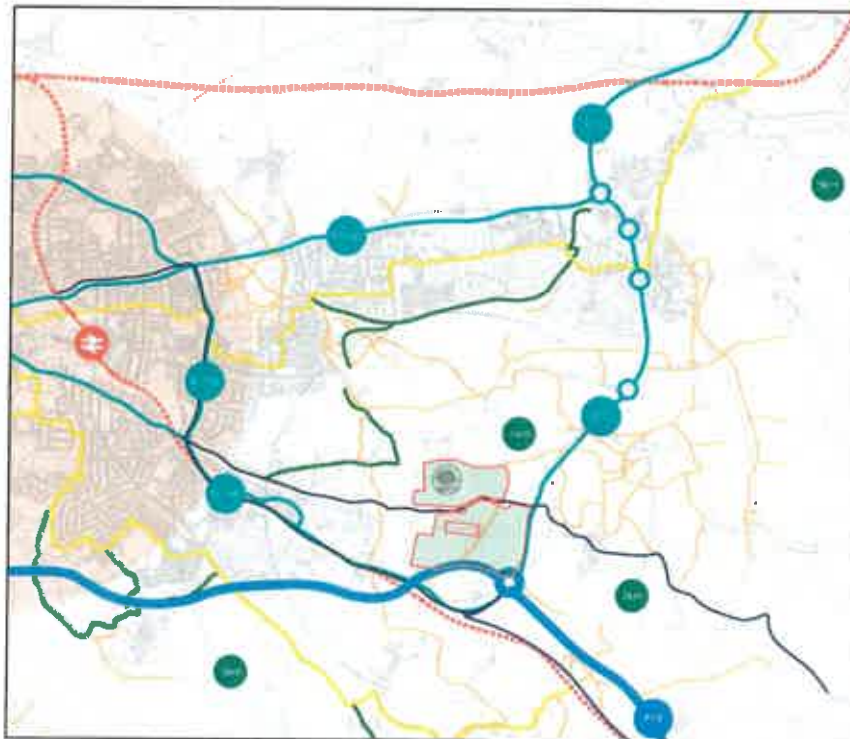
6 SITE SUBMISSIONS

6.1 Overview

6.1.1 Gladman has land interests within the neighbouring districts of East Suffolk and Babergh. Details of these sites are outlined below. The tightly bounded nature of Ipswich Borough means that greater consideration will need to be taken to development opportunities beyond administrative boundaries working under the duty to cooperate. This will be required to ensure that the development needs of the area can be met whilst maintaining a rolling five year housing land supply.

6.2 Orwell Green Garden Village

6.2.1 Gladman are promoting land to the east of Ipswich, within East Suffolk District, for the development of 'Orwell Green Garden Village'. The Orwell Green Garden Village is ideally located on the eastern outskirts of Ipswich, approximately 6.5km from the Town Centre. The land extends to approximately 142 hectares and is located to the north of the A14 and the west of the A12, which together act as a major transport corridor, linking the urban areas of Cambridge and Ipswich to the east coast.



Orwell Green Site Location Plan

6.2.2 The site is included within the Suffolk Coastal Strategic Housing and Economic Land Availability Assessment and Interim Sustainability Appraisal under Site Option Reference 485: Land North and South of Bucklesham Road, IP10 0AG. The SHELAA concludes that the site is potentially suitable for development, subject to a range of wider considerations associated with strategic scale development proposals. Gladman are of the view that in identifying an appropriate strategy for the future development of Ipswich and East Suffolk District, there is a strong case for the allocation of additional land for the development of a garden village to the East of Ipswich in order to meet the development needs of the area and support the wider economic growth ambitions of the region and the UK more widely.

6.2.3 Garden Villages are an effective way to deliver housing within an appropriate timeframe and with critical mass that will facilitate the delivery of infrastructure such as schools, health centres and transport improvements to the benefit of new and existing communities. Each project and location has its own specific context which means the Garden City principles are not a blueprint for designing new Garden Villages but are key characteristics that make Garden Villages successful.

6.2.4 The Orwell Green Garden Village site is well connected and provides a real opportunity to provide a well-planned, well located, well designed community that is supported by the necessary infrastructure and facilities and that meets all the objectives of the Government's Garden Communities Programme. The proposal also has the ability to provide a comprehensive approach to supporting the planning of the wider strategic planning area

Key details of the development proposal are highlighted below:

- A total site size of approximately 142ha
- Approximately 72ha of land for the development of a mix of house types, providing up to 2,700 new homes to suit the requirements of a wide range of households.
- It is anticipated that two new primary schools would be developed on the site and that express bus provision will be made available to access a nearby secondary school.
- Green Infrastructure: approximately 60ha
- An extensive range of new sport, recreation and play facilities
- The development of allotments, a village green and community orchards
- A well located and connected Village Centre at the heart of the development - designed to include space for a market square, community hall, school & crèche, sports & play facilities, a medical centre & pharmacy, a café, a supermarket, other smaller retail units, a village pub and infrastructure for public transport.

6.2.5 A Framework Plan, setting out the proposals for the site is provided at Appendix 1 to these representations.

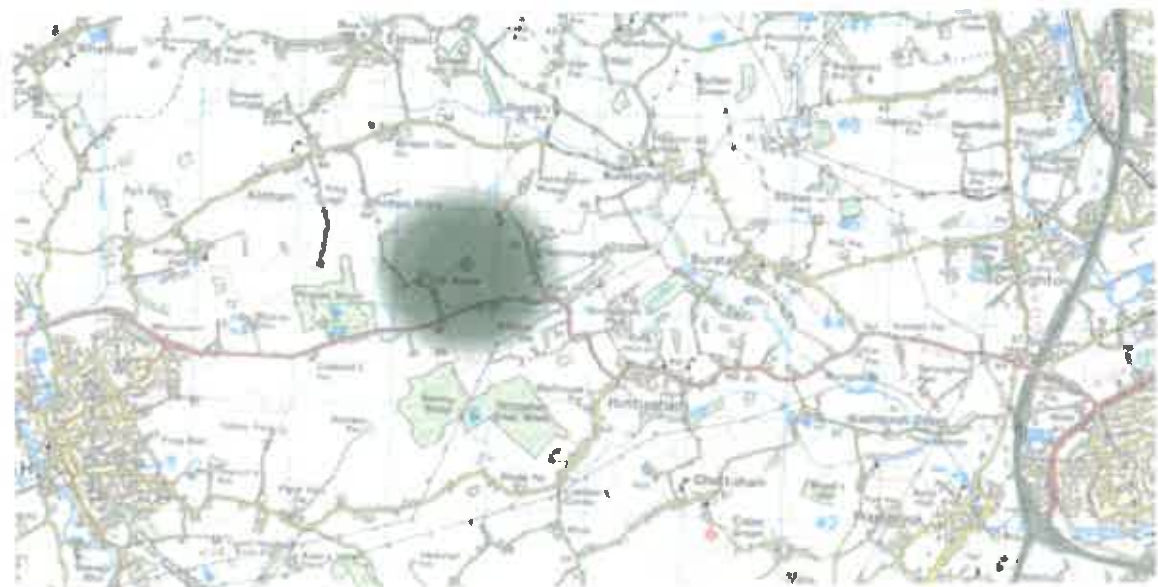
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- 6.2.6** A sustainable and suitable access can be achieved from the A12 via a new roundabout. A roundabout in that location would be helpful in terms of aspirations to reduce speeds (from the current 70mph to 40/50mph) and allow for better distribution of traffic along that road.
- 6.2.7** The site is also well located in terms of public transport routes. It is in proximity to regular bus services which run throughout the day between Ipswich and Felixstowe (services 75/76 and 77), with the opportunity to promote and establish further sustainable modes of transportation through new and improved bus routes and services and by upgrading and maintaining public rights of way and new cycle ways.
- 6.2.8** The site does not fall within the Suffolk Coast & Heaths Area of Outstanding Natural Beauty nor is it within an area of fluvial flood risk, which is a constraint to future development across much of the wider area. It has no physical constraints that would stop the site coming forward. Furthermore, the site can be brought forward in a manner that is sensitive to its wider landscape setting; creates strong and well-connected green infrastructure; and, that provides the opportunity to deliver significant long-term ecological benefits through the retention and enhancement of many existing features as well as the provision of new features that will encourage biodiversity.
- 6.2.9** In terms of sustainable energy, the new development can be designed to mitigate energy usage and loss with high levels of insulation, maximisation of natural light and optimum solar orientation. There are a number of renewable energy generation technologies that can be investigated to help supply the Garden Village with sustainable energy networks, including the installation of photovoltaic panels, local energy storage and sharing by way of batteries, solar thermal panels, ground and air source heat pumps, wind turbines or biomass boilers.
- 6.2.10** The development of a Garden Village in this location also provides a tremendous opportunity to improve the quality of areas where people live and work. As well as on-site employment opportunities, there are a wide range of employment, retail and leisure opportunities in proximity to the site, including those at: Warren Heath Retail Park and the Euro Retail Park, Ransomes Industrial Estate, Springbank Industrial Estate, Three Rivers Business Centre and via its strong links to the centre of Ipswich.
- 6.2.11** The site benefits from having a single landowner who wishes to make the site available for development. This presents an ideal opportunity for development to be brought forward at the Garden Village in shorter timescales than are often observed in relation to strategic development proposals of this nature.
- 6.2.12** The site can be delivered on a phased basis. At this stage we would foresee that a master builder would deliver key infrastructure. It is envisaged that the master builder would play a pivotal role in the delivery of Orwell Green Garden Village, together with a coalition of key stakeholders, through an

effective governance structure that would be put in place from the outset of the project. A community management company with resident and stakeholder participation is envisaged, funded through an annual management charge and on-site funding sources. It is envisaged that the open space and community assets of the Garden Village would be transferred to a management trust or parish council that would be responsible for protecting them in perpetuity.

- 6.2.13 The Orwell Green Garden Village presents an ideal opportunity to establish an exemplar Garden Village through an effective partnership between the local planning authorities within the Ipswich Strategic Planning Area and local stakeholders. It provides huge potential to create a sustainable, distinctive and attractive residential led mixed use new settlement in a location where people will genuinely want to live.

6.3 A Garden Village for Babergh

- 6.3.1 Gladman are also promoting a potential location for growth, which has the ability to take the form of a new settlement located in Babergh District.
- 6.3.2 Gladman has identified a potential area of search for a new Garden Village in a strategic location in Babergh which lies between the settlements of Hadleigh and Ipswich. Gladman are working with the landowners and believe there is an opportunity to deliver a sustainable new settlement in this location which could help meet the housing needs of Babergh and Mid Suffolk, as well as the needs of the wider housing market area including Ipswich. A Location Plan which shows the broad area of search for the new settlement can be seen below:



Babergh District Garden Village - Broad Location Plan

- 6.3.3** The new Garden Village provides the opportunity to deliver the homes people need in well planned, attractive new communities of the highest quality. It has the potential to deliver a combination of new high-quality market and affordable homes, as well as specialised housing. We also envisage business and employment uses, community uses and extensive greenspace forming part of the proposals.
- 6.3.4** The Government has identified that new settlements have a key role to play, not only in meeting this country's housing needs in the short-term but also in providing a stable pipeline of housing well into the future.
- 6.3.5** Creating new communities can minimise the need to develop urban extensions, maintaining the character of existing settlements and reducing pressure on existing social infrastructure such as schools and health services. New settlements can be planned comprehensively, building on the Garden City concept to deliver new homes which will be served by new local infrastructure and will effectively become new communities in their own right.
- 6.3.6** Gladman have identified the following key characteristics which we believe provide a framework for Garden Villages:
- Creating a locally distinctive and attractive environment
 - Provision of a policy compliant level of affordable homes in a variety of different tenures
 - Use of high-quality materials and design
 - Well designed, multi-functional accessible greenspaces
 - Sustainable transport options
 - Enhancing the natural environment and biodiversity
 - Providing homes close to employment opportunities
 - Services for day to day needs

6.4 Why this location?

- The site is strategically located between Ipswich and Hadleigh on the transport corridor between Ipswich and Sudbury;
- The site has the ability to assist in addressing high levels of housing need and poor affordability;

-
- **The site creates opportunities to enhance existing sustainable transport connections within the wider Suffolk area**
 - **The site is ideally located to support the economic growth ambitions of the New Anglia LEP and assist in addressing issues such as low productivity, skills and attainment levels and lower than average earnings**
 - **Two willing and committed landowners, in partnership with Gladman, are in a position to bring forward sufficient land for a garden village, ensuring the scheme is deliverable**

7 CONCLUSIONS

7.1 Assessment against the tests of soundness

- 7.1.1** For the emerging Ipswich Local Plan Review to be found sound at examination it must be able to meet the four tests of soundness as required by paragraph 35 of the Framework. This will require the Local Plan to be positively prepared, justified, effective and consistent with national planning policy.
- 7.1.2** Gladman submit that the Local Plan as currently proposed is unsound and fails to meet the tests of soundness outlined above. Gladman has significant concerns with regard to the Council's ability to meet its housing needs in full over the plan period and also the impact that this will have on the wider Ipswich Strategic Planning Area. This issue must be addressed through positive action and engagement under the Duty to Cooperate.
- 7.1.3** It is vital that the Plans that are put in place across the area can meet the minimum housing needs set using the standard method. In addition, careful consideration will need to be given to the need to plan for new infrastructure, the need to support economic growth ambitions and the need to deliver affordable housing to meet identified needs when setting the housing requirement. The Council has failed to address these issues which are relevant in the Ipswich Strategic Planning Area. Indeed, the proposals within the emerging Local Plan merely seek to roll forward an existing strategy which has failed to deliver the scale of homes needed to meet identified housing needs. It is clear that an alternative strategy is therefore required to support the delivery from the proposed components of supply, such as the Ipswich Garden Suburb and sites within the IP-One area. As previously highlighted in response to the Reg 18 Preferred Options consultation, the report undertaken by Planning Prospects on behalf of Gladman provides reasoned justification for reaching the conclusion that current delivery assumptions from within Ipswich Borough are not realistic and must be supplemented by additional housing sites beyond the administrative boundary in order that an effective plan can be put in place that meet the housing needs of the HMA as a whole.
- 7.1.4** The Orwell Green Garden Village and Babergh Garden Village proposals provide significant opportunities to address these issues as well as ensuring the delivery of affordable housing, supporting economic growth and improvements to the area's infrastructure ambitions. The sites are well related to Ipswich and can therefore be brought forward to make a sizeable contribution to the housing needs of the Borough and the HMA as a whole during the plan period.
- 7.1.5** Given the significant issues raised, Gladman request to participate at the hearing session(s) at the Examination in Public.



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Application Boundary (141.88 ha)

Proposed Infrastructure

- New Roundabout Access off A12
- Main Avenue

Development - 67% of overall Area (81.06ha)

- Residential (72.48 ha)
(2,700 dwellings @ 30 dph including 100c apartments within the Neighbourhood Centre)
- Neighbourhood Centre (2.38ha)
Up to 100 Apartments
Single Large Retail Unit (800sqm)
8 Smaller Retail Units/Purposes (800sqm)
Doctors Surgery (200sqm)
Community Building/Pavilion (400sqm)
B1 Offices (400sqm)
- Primary School (8.00ha)
Primary School 1 - 2 Form Entry & Expansion (2.8ha)
Primary School 2 - 2 Form Entry & Expansion (2.8ha)
- Extra Care Apartments (0.8ha)
- Pub/Restaurant (0.28ha)

Green Infrastructure - 43% of overall Area (60.84ha)

- SANG (48.89 ha)
- Sports Pitches & Changing (0.54ha)
- Village Green with Cricket Pitch and Community Orchard (1.69ha)
- Allotments (1.00ha)
- Indicative Play Areas (0.12ha)
- Indicative Detention Basins (2.8ha)
- Existing Public Right of Way
- Greater Walk
- Retained Trees and Hedgerow
- Proposed Trees and Hedgerow
- Acoustic Barrier and Fence

