

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:
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Planning and Development
Ipswich Borough Council
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Ipswich
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Consultation document(s) to which this comments form relates:	Core Strategy and Policies Development Plan Document Review Final Draft Site Allocations and Policies Development Plan Document Review Final Draft Final Draft Local Plan Review Policies Map
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		Mrs
First name		Emma
Last name		Walker
Job title (<i>where relevant</i>)		Associate
Organisation (<i>where relevant</i>)	The Kesgrave Covenant Ltd	Phase 2 Planning and Development Ltd
Address (<i>Please include post code</i>)	Phillip House St William Court Kesgrave Suffolk IP5 2QP	270 Avenue West Skyline 120 Great Notley Braintree Essex CM77 7AA

E-mail		
Telephone No.		

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

Your name or organisation (<i>and client if you are an agent</i>):	Emma Walker of Phase 2 Planning and Development Ltd on behalf of The Kesgrave Covenant Ltd
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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.)
Core Strategy and Policies DPD Paragraph 6.17	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.
Core Strategy and Policies DPD Paragraph 7.2	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.
Core Strategy and Policies DPD Policy ISPA4	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this policy is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.
Core Strategy and Policies DPD Paragraph 8.28	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.

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.)
Core Strategy and Policies DPD Paragraph 8.29	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.
Core Strategy and Policies DPD Policy CS2	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this policy is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.
Core Strategy and Policies DPD Paragraph 8.55	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this paragraph is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.
Core Strategy and Policies DPD Policy CS7	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording of this policy is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.
Site Allocations and Policies DPD Policy SP1 (and consequential amendments to table 1 and paragraph 4.7)	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, this site allocation should be included within the Site Allocations and Policies DPD. Further details on this matter are set out at the end of this form.
Policies Map ISPA4	Whilst we generally support the inclusion of the cross-border allocation for development at the northern end of Humber Doucy Lane and Tuddenham Road, the current wording relating to this site is not justified or effective and therefore fails the 'tests of soundness'. Further details on this matter are set out at the end of this form.

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.

**Representations to the Local Plan Review – Final Draft
Prepared by Phase 2 Planning and Development Ltd
on behalf of The Kesgrave Covenant Ltd**

These detailed representations have been drafted in support of our representations in relation to the following policies, as summarised on the representation form:

1. The Core Strategy and Policies Development Plan Document Review Final Draft:

- Paragraph 6.17
- Paragraph 7.2
- Policy ISPA4 – Cross Boundary Working to Deliver Sites
- Paragraph 8.28
- Paragraph 8.29
- Policy CS2 – The Location and Nature of Development
- Paragraph 8.55
- Policy CS7 – The Amount of New Housing Required

2. The Site Allocations and Policies Development Plan Document Review Final Draft:

- Policy SP2 (Omission of reference to land at Humber Doucy Lane)

3. Policies Map:

- ISPA4

We would like to participate in the Local Plan Examination to enable the issues raised within these representations to be fully explored.

The Core Strategy and Policies Development Plan Document Review Final Draft
Paragraph 6.17

Summary

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

Detail

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for "future" development for housing delivery and that it will be "appropriately phased" with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

Legal Compliance/Soundness

Although we generally support the Plan, its policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to "future" development or refer to the requirement for phasing without providing appropriate evidence and details.

Proposed Amendment to the Plan

Paragraph 6.17 should be amended to read:

"...A cross-border allocation for ~~future~~ development (within Ipswich Borough and Suffolk Coastal Local Plan area) for housing delivery, ~~appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure~~ is also identified in north-east Ipswich at the northern end of Humber Doucy Lane and Tuddenham Road. ..."

The Core Strategy and Policies Development Plan Document Review Final Draft
Paragraph 7.2

Summary

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

Detail

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for "future" development for housing delivery and that it will be "appropriately phased" with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

Legal Compliance/Soundness

Although we generally support the Plan, its policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to "future" development or refer to the requirement for phasing without providing appropriate evidence and details.

Proposed Amendment to the Plan

Paragraph 7.2 should be amended to read:

"... (iv) The cross-border allocation for future development, ~~appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure~~ proposed at the northern end of Humber Doucy Lane through policy ISPA4; ..."

The Core Strategy and Policies Development Plan Document Review Final Draft
Policy ISPA4: Cross Boundary Working to Deliver Sites

Summary

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that the development is viable and that there are no unnecessary delays to the delivery of development.

Detail

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for "future" development for housing delivery and that it will be "appropriately phased" with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

The policy comments on the location of the green infrastructure. It should be noted that KCL has additional land in the vicinity of the allocation and therefore it may be possible to locate these uses outside the application site. We therefore seek flexibility to the wording of this policy to ensure that the most appropriate option can be pursued.

In addition, the policy sets out the requirements for affordable housing for the site. Whilst the provision of affordable housing on the site is supported in principle, the Council must ensure that targets set for sites are viable.

The draft Plan identifies that sites should provide at least 15% affordable housing, with the exception of land at Humber Doucy Lane and Ipswich Garden Suburb, which should provide at least 30% and 31% respectively. The assessment of affordable housing provision is set out in The Whole Plan Viability Study (January 2020). With regard to Humber Doucy Lane, the calculations (at Appendix 6 of the document) do not include Site Specific Section 106 Contributions or CIL, which leads us to query whether the full infrastructure costs of the development have been considered as part of the appraisal.

We are aware that the Whole Plan Viability Study has identified that Ipswich Garden Suburb development is viable with 31% affordable housing, yet the first two neighbourhoods have been subject to testing at the planning application stage, where it has been agreed that for viability reasons they can provide at least 4% and 5% respectively.

In light of the above, we would therefore suggest that further flexibility is applied to this policy to enable detailed viability assessment of the site.

Legal Compliance/Soundness

Although we generally support the Plan, its policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to "future" development or refer to the requirement for phasing without providing appropriate evidence and details. We recommend that the policy is amended to state that it will be subject to viability testing at the planning application stage, in accordance with policy CS12.

In addition, limiting the green infrastructure to the draft site allocation area is overly restrictive at this stage and does not enable the options to be fully explored. This approach is not the most effective and therefore does not comply with the tests of soundness.

Proposed Amendment to the Plan

Policy ISPA4 should be amended to read:

"Ipswich Borough Council will work with neighbouring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough but adjacent to the boundary, where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner. In order to meet housing needs within the Borough boundary as far as possible, the Council identifies a cross-border allocation for future development of 23.62ha of land within Ipswich Borough in 4 parcels forming ISPA4.1 for future housing growth and associated infrastructure improvements at the northern end of Humber Doucy Lane adjacent to Tuddenham Road. The allocation is shown on the accompanying site sheet for this policy.

It will require land and infrastructure works and green infrastructure (including Suitable Accessible Natural Greenspace) on both sides of the Borough boundary in order to come forward, *however this could include land outside of the allocated site....*

...Development will include at least 30% affordable housing, subject to viability testing at the planning application stage...."

Paragraph 8.28

Summary

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is not considered to be justified and therefore failing the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

Detail

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development.

Paragraph 8.28 refers to transport mitigation measures required for the development of the site as being "challenging". However, this is not considered to be the case. We re-iterate our earlier submissions in relation to the accessibility of the site and proposed transport measures below:

- The site benefits from good public transport accessibility. Humber Doucy Lane, which runs along the southern boundary of the site, is very well served by existing bus services from First Bus, Suffolk on Board and Ipswich Buses. Rail services at Westerfield Junction are easily accessible and around 2km from the site.
- The site also benefits from good road access and lies within approximately 1.5km of the A1214, which is part of the principal road network. The area is served by four existing radial routes, which give direct access to the A1214. There is good access to a number of distributor routes and no access issues.
- The site benefits from good accessibility to services and facilities with the nearest local centre located within walking distance (approximately 800 metres) with services including a convenience store, post office, hairdressers, bakers and public house and additional facilities proposed at the Ipswich Garden Suburb.
- Both Ipswich town centre and Heath Road Hospital are easily accessed by public transport from the site. The latter is a strategic health facility serving Ipswich and the surrounding area and is a major employer within the town.
- The development of this site promotes sustainable transport in accordance with paragraph 108 of the NPPF as:
 - It is located in a sustainable location, adjoining the existing built up area of Ipswich, with good access to facilities and services including good access by sustainable transports.
 - It is capable of providing safe and suitable access to the site for all users. The site can easily be accessed as the land parcels proposed for development have significant frontages onto Humber Doucy Lane.
 - As far as we are aware, SCC Highways have not expressed any objections to the proposal to allocate development in this area.

- A number of transport/highways mitigation measures will be considered as part of the proposals including upgrading of the junctions of Humber Doucy Lane /Tuddenham Road and Tuddenham Road/Church Road.
- The Local Plan Transport Modelling Report prepared by WSP concludes that Suffolk can accommodate the proposed housing growth with appropriate mitigation where necessary.
- The proposals will not influence the Ipswich northern bypass route. Even the inner-most option for the bypass indicates a route to the north of the railway line and therefore, the proposed development will have no impact on the proposed bypass or vice versa.

Legal Compliance/Soundness

Although we generally support the Plan, it's the policies and supporting text relating to the proposed allocation at Humber Doucy Lane, the current reference to "challenging" transport mitigation measures are not justified.

Proposed Amendment to the Plan

Paragraph 8.28 should be amended to read:

"The site allocation at the northern end of Humber Doucy Lane is located at the edge of Ipswich approximately 3.5km from the town centre. Sustainable transport connections will be key to providing linkage to employment and other opportunities. In addition, it is acknowledged that the transport mitigation measures *are* required for the development of the site ~~are challenging~~ and it is essential that significant modal shift is delivered through strong travel plans and other sustainable measures."

The Core Strategy and Policies Development Plan Document Review Final Draft
Paragraph 8.29

Summary

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking to query some of the detailed wording which unless clear and robust evidence can be provided is not considered to be justified or effective and therefore failing the 'tests of soundness'. These representations therefore seek to retain the current allocation and whilst we support the affordable housing provision on site, we query whether the quantum of affordable housing has been robustly assessed.

Detail

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development.

The draft Plan identifies that sites should provide at least 15% affordable housing, with the exception of land at Humber Doucy Lane and Ipswich Garden Suburb, which should provide at least 30% and 31% respectively. The assessment of affordable housing provision is set out in The Whole Plan Viability Study (January 2020). With regard to Humber Doucy Lane, the calculations (at Appendix 6 of the document) do not include Site Specific Section 106 Contributions or CIL, which leads us to query whether the full infrastructure costs of the development have been considered as part of the appraisal.

We are aware that whilst the Whole Plan Viability Study has identified that Ipswich Garden Suburb development is viable with 31% affordable housing, yet the first two neighbourhoods have been subject to testing at the planning application stage, where it has been agreed that they can provide at least 4% and 5% respectively.

In light of the above, we would therefore suggest that further flexibility is applied to this policy to enable detailed viability assessment of the site, if required.

Legal Compliance/Soundness

Although we generally support the Plan, it's the policies and supporting text relating to the proposed allocation at Humber Doucy Lane and the provision of affordable housing on the site, more detailed viability testing may be required to ensure that the site is viable having regard to all infrastructure costs.

Proposed Amendment to the Plan

Paragraph 8.29 should be amended to read:

"The Council will outline expected infrastructure provision of both green infrastructure and built infrastructure required as part of the joint agreed master- planning process to the cross-border Humber Doucy Lane sites. The Whole Plan Viability Assessment for the Local Plan identifies that this area of land falls within a high value zone and indicates that approximately 30% affordable housing could be achieved on a greenfield development, *however this will be subject to further testing at the planning*

application stage. This level of affordable housing also broadly aligns with the Suffolk Coastal Local Plan affordable housing requirement of 33%.”

The Core Strategy and Policies Development Plan Document Review Final Draft
Policy CS2: The Location and Nature of Development

Summary

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

Detail

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, referred to at policy CS2 and falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for "future" development for housing delivery and that it will be "appropriately phased" with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

The policy comments on the location of the green infrastructure. It should be noted that KCL has additional land in the vicinity of the allocation and therefore it may be possible to locate these uses outside the allocated site. We therefore seek flexibility to the wording of this policy to ensure that the most appropriate option can be pursued.

Legal Compliance/Soundness

Although we generally support the Plan, it's the policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to "future" development or refer to the requirement for phasing without providing appropriate evidence and details.

In addition, limiting the green infrastructure to the application site is overly restrictive at this stage and does not enable the options to be fully explored. This approach is not the most effective and therefore does not comply with the tests of soundness.

Proposed Amendment to the Plan

Policy CS2 should be amended to read:

Representations to the Local Plan Review – Final Draft
Phase 2 Planning and Development Ltd on behalf of The Kesgrave Covenant Ltd

"b. Allocating sites for future development at the northern end of Humber Doucy Lane for housing and associated infrastructure, ~~appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure,~~ and working with East Suffolk Council to master plan development and ensure a comprehensive approach to its planning and delivery (see policy ISPA4)...."

The Core Strategy and Policies Development Plan Document Review Final Draft
Paragraph 8.55

Summary

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of supporting text to ensure that there are no unnecessary delays to the delivery of development.

Detail

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, referred to at policy CS2 and falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane will come forward "as development draws to a conclusion at Ipswich Garden Suburb". The Plan should be amended to provide greater clarity with regard to the infrastructure that is required for delivery of dwellings at Humber Doucy Lane. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

Legal Compliance/Soundness

Although we generally support the Plan, it's the policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to the site coming forward "as development draws to a conclusion at Ipswich Garden Suburb" without providing appropriate evidence and details.

Proposed Amendment to the Plan

The final bullet point of paragraph 8.55 should be amended to read:

~~"As development draws to a conclusion at Ipswich Garden Suburb it will enable~~ Lower density housing development *is* to be master planned jointly with East Suffolk Council at the northern end of Humber Doucy Lane, which will maintain and ensure separation between Ipswich and surrounding settlements."

The Core Strategy and Policies Development Plan Document Review Final Draft
Policy CS7

Summary

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text to ensure that there are no unnecessary delays to the delivery of development.

Detail

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the draft Plan identifies that land at Humber Doucy Lane is allocated for "future" development for housing delivery and that it will be "appropriately phased" with the delivery of the Ipswich Garden Suburb and associated infrastructure. The Plan should be amended to provide greater clarity with regard to the infrastructure that is required. This approach will help to ensure that there are no unnecessary delays and development can be delivered within the Plan period.

Legal Compliance/Soundness

Although we generally support the Plan, it's the policies and supporting text relating to the proposed allocation at Humber Doucy Lane, as currently drafted, it is neither justified nor effective as it should be specific about any infrastructure requirements that will influence the timescales of delivery and should not make generic references to "appropriate phasing with the delivery of the Ipswich Garden Suburb and its associated infrastructure" development or refer to the requirement for phasing without providing appropriate evidence and details.

Proposed Amendment to the Plan

Policy CS7 should be amended to read:

~~"... c. ...Delivery will also take place at the northern end of Humber Doucy Lane, appropriately phased with the delivery of the Ipswich Garden Suburb and its associated infrastructure ..."~~

The Site Allocations and Policies Development Plan Document Final Draft

Policy SP2: Land allocated for Housing (Omission of reference to land at Humber Doucy Lane within Table 1)

Summary

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 of the Core Strategy at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, reference should also be made to this allocation in the Site Allocations and Policies document for consistency. As currently drafted the Site Allocations and Policies DPD, by failing to include reference to this allocation, is neither justified nor effective and therefore fails the 'tests of soundness'. This representation therefore seeks to include reference to this site within the DPD.

Detail

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site and are keen to work with both Councils to progress this development.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036) and yet it is not referenced within the Site Allocations and Policies DPD. For consistency consequential amendments should be made to reference this site allocation Table 1 and within paragraph 4.7.

Legal Compliance/Soundness

Although we support the inclusion of the allocation at Humber Doucy Lane within the Core Strategy document, it should also be included within the Site Allocations and Policies DPD. Its omission is neither justified nor effective.

Proposed Amendment to the Plan

An additional line should be provided within table 1 in relation to the allocation at Humber Doucy Lane:

Site ref	Site name and development description	Site size ha (% residential on mixed sites)	Indicative capacity (homes)	Capacity evidence	Likely delivery timescale (S,M,L)
<i>ISPA 4.1</i>	<i>Northern End of Humber Doucy Lane</i>	<i>23.62ha (c. 50%)</i>	<i>496</i>	<i>35dph (DM23c)</i>	<i>M/L</i>

For the sake of completeness, this table should also include reference to Ipswich Garden Suburb.

Paragraph 4.7 should be amended to reflect the proposed changes to table 1 with revised wording as follows:

"The indicative capacity of the sites in table 1a listed in the policy above is ~~6,514,750~~ dwellings. These will contribute to meeting the minimum housing requirement of 8,010 dwellings by 2036, as identified through Policy CS7 of the Final Draft Core Strategy. ~~In addition,~~ ~~the~~ The Final Draft Core Strategy allocates land for the development of approximately 3,500 dwellings at Ipswich Garden Suburb (the Ipswich

Northern Fringe) through policy CS10, with delivery expected to start in 2019 and end in 2036. The Core Strategy Review also identifies a cross-border allocation for future development (within Ipswich Borough and Suffolk Coastal Local Plan area) for housing delivery, ~~appropriately phased with delivery of the Ipswich Garden Suburb and its associated infrastructure~~ at the northern end of Humber Doucy Lane adjacent to Tuddenham Road, through policy ISPA4.”

Policies Map

ISPA4 Land allocated for future housing growth and associated infrastructure improvements

Summary

Our clients, the Kesgrave Covenant Ltd (KCL), support the residential allocation of the land within their control under policy ISPA4 at the northern end of Humber Doucy Lane. Whilst we strongly support the principle of including this cross-border site for development, we are seeking amendments to some of the detailed wording which is considered to be neither justified nor effective and therefore fails the 'tests of soundness'. These representations therefore seek to retain the current allocation whilst making relatively minor amendments to the wording of the text on the policies map to ensure that there are no unnecessary delays to the delivery of development.

Detail

As identified above, KCL control land to the north of Humber Doucy Lane, Ipswich, falling within the draft allocation ISPA4. This site is a cross boundary allocation, with additional land, also falling under the control of KCL, proposed for development within the Suffolk Coastal Local Plan under policy SCLP12.24. KCL support the inclusion of this site for development and are keen to work with both Councils to progress this development. We set out the merits of the site in our earlier representations and given that this site is now included within the draft Plan as an allocation, these submissions are not repeated here.

The draft Plan identifies that land at Humber Doucy Lane will deliver 496 dwellings within the Plan period (up to 2036). It is important that the wording of the Plan does not unnecessarily delay delivery of dwellings on this site. As it is currently written, the Policies Map identifies that land at Humber Doucy Lane is allocated for "future" housing growth and "associated infrastructure improvements". As identified elsewhere within our representations, the Plan should be amended to provide greater clarity with regard to the infrastructure that is required and with this clarity, there is no requirement to refer to "future" development.

The proposals will need to "provide on- and off- site infrastructure to support the development and mitigate the impact of the development on the existing community and environment" in accordance with draft policy CS17 (Delivering Infrastructure). It is not necessary for the Policies Map to refer to associated infrastructure improvements, since this provision is made under draft policy CS17 and these improvements are likely to be off-site as well as on-site. One example of off-site requirements are highways improvements.

Legal Compliance/Soundness

Although we generally support the Plan, the Policies Map should not refer "future" development of the site, nor should it refer to infrastructure requirements. As currently drafted, it is neither justified nor effective and may cause unnecessary delay to delivery of development.

Proposed Amendment to the Plan

The Policies Map should be amended to read:

"Land allocated for future housing growth & associated infrastructure improvements...ISPA4"