

Felicia Blake

From: Nick Davey
Sent: 02 March 2020 17:18
To: PlanningPolicy
Subject: Public Consultation for the Ipswich Local Plan Review Final Draft 15th January 2020 – 2nd March 2020
Attachments: Local Plan Final Draft Comments Form.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir / Madam

We are pleased to attach comments, made on behalf of Cardinal Lofts (Mill) Ltd, in respect of the Ipswich Local Plan Review Final Draft.

We would be grateful for confirmation of receipt.

Regards

Nick Davey

W: www.jtspartnership.co.uk

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Public Consultation for the Ipswich Local Plan Review Final Draft

15th January 2020 – 2nd March 2020

Planning and Compulsory Purchase Act 2004

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

Consultation Comments Form



e-mail:
planningpolicy@ipswich.gov.uk

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

website:
www.ipswich.gov.uk

Consultation document(s) to which this comments form relates:	Ipswich Final Draft Local Plan
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 2 nd 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		
First name		
Last name		
Job title (<i>where relevant</i>)		
Organisation (<i>where relevant</i>)	Cardinal Lofts (Mill) Ltd	The JTS Partnership LLP
Address (<i>Please include post code</i>)		Number One The Drive Brentwood Essex CM13 3DJ
E-mail		
Telephone No.		

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

Your name or organisation (and client if you are an agent):	The JTS Partnership LLP on behalf of Cardinal Lofts (Mill) 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.)
<p>Core Strategy and Policies Development Plan Document Review Final Draft & Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft – Background.</p>	<p>Background</p> <p>Cardinal Lofts (Mill) Ltd owns the freehold, or has a major interest in, a number of sites (IP035: St Peter Port – IP206: Cranfields – IP211: Regatta Quay), which are all located in the Northern Quays area of the Waterfront. The Company has been talking to planning officers about potential future developments for some time and, in October 2018, It presented its emerging proposals for the St Peter Port site to the Council’s Conservation and Design Panel.</p> <p>The successful development of the Company’s site is key to delivering both a number of the Council’s objectives for the Waterfront area (including the aim of improving north-south links between the Waterfront and the Town Centre) and the overall strategy of concentrating new development in the IP-One Area. The Company is, however, concerned that the emerging policies do not take into account the significant ‘abnormal’ costs of developing these sites (and, in particular, IP035) and will, therefore, render development financially unviable and, ultimately, non-deliverable. As such, the Final Draft is unsound.</p> <p>In March 2019, the Company made representations, in respect of both the preferred options draft Core Strategy and Site Allocations and Policies documents, seeking a greater degree of flexibility into those policies that will be directly material to any future application(s) that are brought forward for these sites. In addition to seeking recognition, within the emerging plans, that development needs to be profitable, in order to be undertaken, the Company specifically requested that the Borough Council:-</p> <ul style="list-style-type: none"> • amend those policies relating to Site IP035 that restrict the height and density of development that may be achieved; and, • introduce a specific recognition that, in order to further the

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	<p>development of all three sites, some parking provision should be made for new residents, which can only be located on-site IP035.</p> <p>Whilst the Council has accepted some of the suggestions, the Company is still concerned that the operation of the new Plan will potential frustrate the development of these sites. Accordingly, it is of the review the Final Draft is not sound.</p>
<p>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 6: Vision and Objectives – Paragraphs 6.7 & 6.8.</p>	<p>Vision & Objectives</p> <p>The Company continues to support the general Vision as is set out at paragraph 6.7. It is also in general agreement with the Objectives (paragraph 6.8), but considers that there should be explicit recognition that, unless development is viable (or is subsidised from the public purse) it will not take place and the Vision will not, therefore, be achieved (and is unsound).</p> <p>Summary: Object for the reasons set out above. The inclusion of the word ‘viable’ needs to be added to Objective 4.</p>
<p>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 6: The Spatial Strategy – Paragraphs 6.10 to 6.22.</p>	<p>The Spatial Strategy</p> <p>The Company offers its general support for the spatial strategy, as set out at paragraphs 6.10 to 6.22, and, in particular, the objective of focussing development in central Ipswich in order to tackle issues of deprivation and social exclusion (see also paragraph 6.8 - Objective 3).</p> <p>Summary: Support.</p>
<p>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS2 and paras 8.53 to 8.67.</p>	<p>The Location and Nature of Development</p> <p>Policy CS2 gives expression to the Council’s spatial strategy and its main principles are supported by the Company. In particular, the Company again notes the focus that is being placed upon the IP-One Area, where high-density development will be the norm.</p> <p>The Company notes, and welcomes, the changes made to criterion h of the policy, which is now consistent with the guidance set out in the NPPF.</p> <p>Summary: Support</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
<p>Core Strategy and Policies Development Plan Document Review Final Draft – Policy CS3</p>	<p>IP-One Area Action Plan</p> <p>The Company welcomes the change made to criterion c and the explicit recognition that guidance set out in the Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft may not always be the optimum way to develop a site.</p> <p>Summary: Support</p>
<p>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS5 and paras 8.92 to 8.98.</p>	<p>Improving Accessibility</p> <p>The Company generally welcomes, and supports, initiatives that are designed to minimise the need to travel and promote foot, bicycle and public transport travel modes.</p> <p>The Company also welcomes the recognition that some journeys will need to be made by car, however, it is disappointed that only the Town Centre is specifically mentioned as being a location, the vitality and viable of which, depends upon access by a variety of transport modes. The Company is of the view that, in order for the Final Draft to be found sound, this ‘recognition’ needs to be expanded to include the whole of the IP-One Area.</p> <p>Summary: Object for the reasons set out above.</p>
<p>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS8 and paras 8.113 to 8.125</p>	<p>Housing Type and Tenure</p> <p>The Company welcomes the acknowledgement that, in some cases, such as due to the high cost of development and ‘abnormals’ relating to a site, it may not always be viable to provide a full mix of dwelling types and sizes.</p> <p>Summary: General support.</p>
<p>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS12 and paras 8.150 to 8.163</p>	<p>Affordable Housing</p> <p>The Company welcomes the acknowledgement that, in some cases, such as due to the high cost of development and ‘abnormals’ relating to a site, it may not always be viable to provide full affordable housing provision.</p> <p>It is understood that the Council will shortly be progressing with its proposed Community Infrastructure Levy. This will place additional financial burdens upon development and, in some circumstances, reduce the amount of affordable housing that can be provided (on viability</p>

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	<p>grounds).</p> <p>Summary: General support.</p>
<p>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 8: Policy CS16 and paras 8.199 to 8.209.</p>	<p>Green Infrastructure, Sport and Recreation</p> <p>Whilst the Company generally supports the objectives of this policy, it considers that, in order for the Final Draft to be found sound, there should be an explicit recognition that, on high density sites within the IP-One Area, and particularly along the Waterfront, it will not be possible to make full provision for private, and public, open space, in accordance with the Council’s standards. Open space is a very ‘land hungry’ use and, if developments have to meet full standards, densities will be greatly reduced. This could threaten the achievement of the Council’s spatial strategy and result in new development not making the best, and most effective, use of previously developed sites.</p> <p>Summary: Object for the reasons set out above.</p>
<p>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 9: Policy DM6 and paras 9.6.1 to 9.6.9.</p>	<p>Provision of New Open Spaces, Sport and Recreation Facilities</p> <p>The Company’s comments, in respect of this policy, follow on from those set out above in relation to Policy CS16. The Company again offers its general support to the objectives of the policy, but considers that, in order to be found sound, it needs to be more explicit in recognising that, on higher density, previously developed sites in the IP-One Area, and particularly on the Waterfront, it will not be possible to make full provision for open space in accordance with the Council’s standards.</p> <p>Summary: Object for the reasons set out above.</p>
<p>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 9: Policy DM7 and paras 9.7.1 to 9.7.11</p>	<p>Provision of Private Outdoor Amenity Space In New and Existing Developments</p> <p>As with the comments relating to Policies CS16 and DM6, there should be explicit recognition that, in respect of high density, previously developed sites, it may not always be possible to make full provision for private amenity space to accord with the Council’s standards.</p> <p>Summary: Object for the reasons set out above.</p>

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<p>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 9: Policy DM13 and paras 9.13.1 to 9.13.26</p>	<p>Built Heritage & Conservation</p> <p>The Company supports the general objectives set out in this policy and is satisfied with the revised wording of the policy, which better accords with the guidance set out in the NPPF.</p> <p>Summary: General support.</p>
<p>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 9: Policy DM15 and paras 9.15.1 to 9.15.7 and IP-One Area Inset Policies Map.</p>	<p>Tall Buildings</p> <p>Whilst the Company generally supports the policy, it objects to the exclusion of Site IP035 from the ‘arc of land’, where tall buildings may be appropriate, as shown on the IP-One Area Inset Proposals Map.</p> <p>The costs of developing Site IP035 are such that a high density development, potentially involving one, or more, ‘tall buildings’ will be required. The Council has granted planning permission (ref: 07/00555/FUL) to redevelop the site for mixed use purposes, with buildings ranging from 7 to 11 storeys in height and, since then, ‘tall buildings’ have been developed on a number of adjacent sites.</p> <p>The policy, as currently worded, will potentially frustrate the development of this key Waterfront site and is, therefore, unsound. Impacts upon the setting of adjacent listed buildings, and other heritage assets, can be adequately addressed under Policy DM13.</p> <p>Summary: Objection.</p>
<p>Core Strategy and Policies Development Plan Document Review Final Draft – Chapter 9: Policy DM22 and paras 9.22.1 to 9.22.8</p>	<p>Car and Cycle Parking in New Development</p> <p>The Company welcomes the recognition (para 9.21.6) that many people still own cars and that adequate levels of residential parking, that uses land efficiently and is well designed, needs to be provided as part of new residential schemes.</p> <p>Summary: Support.</p>
<p>Core Strategy and Policies Development Plan</p>	<p>The Density of Residential Development</p> <p>The Company welcomes the policy support for high densities of residential</p>

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Document Review Final Draft – Chapter 9: Policy DM23 and paras 9.23.1 to 9.23.6	<p>development in the Portman Quarter and Waterfront areas.</p> <p>Summary: Support.</p>
Site Allocations and Policies (Incorporating IP- One Area Action Plan) Development Plan Document Review Final Draft Chapter 4: Policy SP2	<p>Land Allocated for Housing</p> <p>The Company welcomes the identification of Site IP035 for development as a residential-led mixed-use scheme. It is, however, of the view that the site has a much greater capacity than is indicated in the policy – in fact, a much greater density, than that implied by the capacity figure, is required in order to make any form of development viable.</p> <p>As is acknowledged in the related Site Sheet (the status of which is not clear), Site IP035 is subject to a number of abnormal development costs, not the least being archaeology. A lot of information was collated, about the archaeological potential of the site, in connection with the submission, and grant of planning permission, under reference 07/00555/FUL. The site is known to be of high archaeological potential and the cost of full archaeological excavation and recording was costed at £1.3 million (plus or minus 50%) and was estimated to take 12 months (plus or minus 50%), in 2008. Given the uncertainty surrounding both the cost, and timescale for, archaeological excavation, and the financial crash of 2008/2009, it proved impossible to raise the necessary finance to fund the development.</p> <p>The site is also subject to a number of other abnormals, which include the following.</p> <ul style="list-style-type: none"> • Hydrology: There are a number of water channels running under the site (it lies on the route of the former Lower Brook Street) and there are concerns that archaeological excavation could change the hydrology of the site and thus impact upon the structural integrity of the two listed adjacent churches. Accordingly, there is a requirement for the condition of the churches to be monitored, throughout the excavation process, with a £250k cash bond (in 2008) being required in order to insure against any damage. • Numbers 1-5 College Street: The listed buildings that lie within the site are in a very poor state of repair and £500k has recently had to be spent on them to make them wind and watertight. They cannot be insured (as they are currently empty) and the cost of the works

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already carried out has to be recovered from any future development.

- **Land Contamination:** There is a 'backfilled' pit on the site and the cost of remediation works have been put at over £100k.
- **Sustainable Urban Drainage:** The site lies within Flood Zone 2/3, with the water table being very close to the surface. Accordingly, SUDS measures have to be above ground, which adds in the order of £500k, over and above the cost of installing a 'traditional' SUDS scheme, to development costs.
- **Air Quality:** The site is surrounded by the heavily trafficked Star Lane gyratory system and the additional costs of air quality mitigation measures are put at £500k.
- **Design:** the site lies between two listed churches and adjacent to the Wet Dock Conservation Area. As a result, a high standard of design will be required, which it is anticipated will add up to 20% to normal build costs.

The following table summarises the abnormal costs (i.e. those over and above developing the 'average' brownfield' site) and compares the option of dealing with archaeological issues via excavation and recording (which cannot be financed due to the uncertainties involved) or via the construction of an above ground raft, upon which the development will sit (so preserving the archaeology in-situ).

Whichever route is chosen, the costs of developing this site are very high and, in order to be justified, a much higher number of dwellings, and a greater density, than is indicated in Policy SP2 needs to be provided.

ST PETER PORT		
ABNORMAL* COST OF DEVELOPMENT		
	Excavate and Record	Raft Slab
ARCHAEOLOGY		
Excavations	£2,500,000	
Construction Cost	£500,000	£2,000,000

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	Risk Insurance for Adjacent Buildings	£250,000	
	Additional Interest / Management arising from 12 month excavation period	£500,000	
	TOTAL ADDITIONAL COST DUE TO ARCHAEOLOGICAL ISSUES	£3,750,000	£2,000,000
	1-5 COLLEGE STREET (cost of making wind & watertight)	£500,000	
	LAND CONTAMINATION	£100,000	
	SUSTAINABLE URBAN DRAINAGE	£500,000	
	AIR QUALITY	£500,000	
	DESIGN	Increase cost of constructing facades by 20%	
	<p>*Abnormal – costs over, and above, cost of developing ‘average’, brownfield, urban site.</p> <p>The Company also considers that there needs to be explicit reference to any future development of the site having to incorporate an element of car parking, for both the residential units to be accommodated thereon and for the further residential units to be developed on Sites IP206 and IP211.</p> <p>Development needs to incorporate some parking for the new residential units (at an Indicative ratio of 2:1), together with parking (at a similar ratio) for those parts of Sites IP206 and IP211, which have not yet been built out.</p> <p>Sites IP206 and IP211 fell into the hands of the Receiver, before they were completed, due to the recession of 2008/2009. Unfortunately, and in order to generate some income/funds, the Receiver has sold off all the available parking, on both sites, with those parts of the development which have been completed. As such, there is no existing parking, and no</p>		

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	<p>opportunity to provide further parking, for those parts of these developments that have not yet been completed. If the remaining parts of these developments are to be brought forward, in accordance with Policy SP3, some parking has to be provided on an adjacent, accessible, site.</p> <p>This is particularly important with respect to Site IP206. The Borough Council will be familiar with the issues that have beset the 20-storey tower block building which, despite being completed to 'shell' for nearly a decade, has never been occupied. Before that development can be completed, all of the cladding needs to be removed and replaced, and structural issues need to be rectified, at significant cost. Site IP206 also includes the Victorian Albion Wharf building, which the Company is committed to rebuilding, whilst retaining the important dock facing elevation (again at significant cost). Both investments can only be justified if there is some parking provision made for the new residents.</p> <p>Summary: Support the identification of Site IP035, but object to the indicative capacity and lack of express reference to the need to provide parking for both the development itself and adjacent sites (IP206 and IP211). Without these changes, the Final Draft is unsound.</p>
<p>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 4: Policy SP3.</p>	<p>Land with Planning Permission or Awaiting a Section 106.</p> <p>The Company supports the intentions underlying Policy SP3 and, in particular, the identification of Sites IP206 and IP211. The Company still considers, however, that the capacity figures are on the conservative side (and should be increased by up to 50%), with specific reference being made to the need to provide parking on an adjacent suitable site (such as IP035).</p> <p>Summary: Object for the reasons set out above.</p>
<p>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 5: Paras 5.1 to 5.8.</p>	<p>IP-One Area</p> <p>The Company supports the general vision for the IP-One area (see also representations made with respect to Core Strategy Chapter 6: Vision and Objectives and Spatial Strategy).</p> <p>Summary: General support</p>

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<p>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 5: Policy SP11 and paras 5.17 to 5.23.</p>	<p>The Waterfront</p> <p>The Company fully supports this Policy.</p> <p>Summary: Support</p>
<p>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 5: Policy SP15 and paras 5.32 and 5.38</p>	<p>Improving Pedestrian and Cycle Routes</p> <p>The Company supports the general thrust of the Policy, including the proposals to improve pedestrian links between the Central Shopping Area and Waterfront. However, there are still serious concerns about how these proposals impact upon the development of Site IP035.</p> <p>Summary: Qualified Support</p>
<p>Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review Final Draft Chapter 6: Merchant Quarter</p>	<p>The Merchants Quarter</p> <p>The Company controls three of the most important sites (IP035, 1P206 and IP211) in the Merchants Quarter and it is concerned that the Development Options plan (page 82), together with the Development Principles (as expressed in the table on page 83 & 84), are not sound in that they will render development unviable and frustrate proposals to bring the sites forward. Whilst the Company does not take issue with the objectives for the Merchants Quarter, it is of the view that:-</p> <ul style="list-style-type: none"> ● North-South Linkages through Site IP035 are in the wrong location. ● Proposals for a new 'urban focal space' on Site IP035 are oversized and over-ambitious. ● Site IP035 is capable of accommodating buildings of more than five storeys in height without having an adverse impact upon the setting of adjacent listed buildings or the historic environment. <p>This representation should be read together with the comments made</p>

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
	<p>with respect to the Site Allocations and Policies Document Chapter 5: Policy SP2.</p> <p>Summary: Object</p>

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.

