

116

Felicia Blake

From: Emma GLADWIN
Sent: 02 March 2020 20:39
To: PlanningPolicy
Cc: James Firth
Subject: Regulation 19 Consultation - Representations on Behalf of Bloor Homes
Attachments: Ipswich Reg 19 Reps - Bloor Homes, Rushmere.pdf; Ipswich Reg 19 Comment Form - Bloor Homes, Rushmere.pdf

Follow Up Flag: Follow up
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Dear Sir/Madam,

Please find attached representations on behalf of Bloor Homes in relation to the current Regulation 19 consultation for the Ipswich Local Plan Review Final Draft. I would be grateful if you could confirm receipt. Should you have any queries please do not hesitate to contact me.

Kind regards,

Emma Gladwin

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Public Consultation for the Ipswich Local Plan Review Final Draft

15th January 2020 –2nd March 2020

Planning and Compulsory Purchase Act 2004

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

Consultation Comments Form

e-mail: planningpolicy@ipswich.gov.uk



**IPSWICH
BOROUGH COUNCIL**

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Consultation document(s) to which this comments form relates:	Core Strategy and Policies Development Plan Document Review & Site Allocations and Policies Development Plan Document Review
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		Miss
First name		Emma
Last name		Gladwin
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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):	Bloor Homes c/o Emma Gladwin, Strutt & Parker
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Please specify which document(s) and document part you are commenting upon.

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

Document(s) and document part.	Comment(s) (expand the boxes if necessary and please ensure your name is included on any additional sheets.)
Policy CS7	We raise concerns over the lack of housing trajectory and no consideration of whether the housing figure should be uplifted to meet economic growth resulting in the Plan being ineffective, not positively prepared and unjustified. For our full representation please refer to the accompanying document.
Policy CS12	We raise concerns about the full affordable need not being met, with no consideration of uplifting the housing figure or allocating additional sites. This is therefore not positively prepared, justified, effective or consistent with national policy. For our full representation please refer to the accompanying document.
Policy CS8	We raise concerns that despite Policy CS8 setting out the types of housing needed, the strategy within the Plan does not seek to meet this need and instead allocates a large proportion of sites for high density smaller flats. This is therefore not positively prepared, justified, effective or consistent with national policy. For our full representation please refer to the accompanying document.
Sustainability Appraisal	The spatial strategy chosen in the Plan is not tested in the Sustainability Appraisal and the scoring provided to some of the options that are tested is not consistent or fully justified. The Sustainability Appraisal contains significant flaws that render the Plan unsound and not currently legally compliant. For our full representation please refer to the accompanying document.

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.

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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.** ×

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Ipswich Core Strategy and Policies Development Plan Document Review & Site Allocations and Policies Development Plan Document Review Reg 19 Representations

Humber Doucy Lane, Rushmere St Andrew

Prepared on behalf of Bloor Homes

March 2020

Site Name:	Humber Doucy Lane, Rushmere St Andrew
Client Name:	Bloor Homes
Type of Report:	Ipswich Reg 19 Representations
Prepared by:	Emma Gladwin BSc (Hons) MSc MRTPI Sam Hollingworth MRTPI
Approved by:	Andy Butcher Dip TP MRTPI
Date:	March 2020

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CONTENTS

1.0 Introduction..... 1
2.0 Housing Need..... 2
3.0 The Context for Growth in the Ipswich Strategic Planning Area, and Cross-Boundary
Development..... 8
4.0 The Site – Land at Humber Doucy Lane 11
5.0 Sustainability Appraisal..... 15
6.0 Conclusion..... 16

APPENDICES

- Appendix A Site Location Plan
- Appendix B Development Framework Plans
- Appendix C Suffolk Coastal Hearing Statements on Behalf of Bloor Homes
- Appendix D Site Allocations Plan
- Appendix E Highways Technical Note
- Appendix F Sustainability Appraisal Concerns

1.0 Introduction

- 1.1 This representation is submitted by Strutt & Parker on behalf of Bloor Homes to respond to the Regulation 19 consultation on the Ipswich Core Strategy and Policies Development Plan Document Review & Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review (the Local Plan).
- 1.2 Bloor Homes are promoting land at Humber Doucy Lane, Rushmere St Andrew, (the Site) as shown on the Site Location Plan at Appendix A. The land is situated within both the Ipswich Borough and East Suffolk (formerly Suffolk Coastal) District.
- 1.3 The overall Site is approximately 115 hectares in size. It presents both a shorter term opportunity for a smaller scheme and a medium-long term opportunity for a larger scale Garden Village development. Development Framework Plans are included at Appendix B indicating how the Site could be developed.
- 1.4 Representations have been submitted to the Issues and Options stage in 2017 and the Preferred Options stage in 2019.
- 1.5 With a large portion of the Site being in East Suffolk District, representations on behalf of Bloor Homes have also been made to the currently emerging Suffolk Coastal Local Plan, including attendance at Examination. Concerns were raised in relation to the cross boundary approach of working with Ipswich Council and the Site was promoted for a large scale opportunity. The relevant Hearing Statements are included at Appendix C.
- 1.6 In relation to the current consultation, being a Regulation 19 consultation, this representation is made with regard to the tests of soundness which a Local Plan must satisfy as set out at paragraph 35 of the National Planning Policy Framework (NPPF). As set out, we do not consider that the current Local Plan is positively prepared, justified, effective or consistent with national policy.

2.0 Housing Need

- 2.1 The emerging Local Plan sets out that the total housing need under the standard method is at least 8,010 new dwellings between 2018 and 2036. The Local Plan seeks to meet this need and provide 9,500 additional new jobs, as set out in objective 2 of the Local Plan.
- 2.2 Given that the border of Ipswich is drawn very tightly around the developed area, it does present challenges for the Council which are recognised in the emerging Local Plan. Paragraph 8.7 of the emerging Plan sets out that choices about directions for growth at the edge of Ipswich within the Borough boundary are limited, and that a cross boundary approach is the starting point to ensure that development required to meet local needs is provided in a planned and coordinated way, in the right locations, and creates successful places.
- 2.3 We support the recognition within the Plan that the Council will need to work closely with neighbouring authorities regarding future development and infrastructure, as set out in the first strategic objective.
- 2.4 However, as expanded upon below we do not consider that the Council have fully explored all opportunities to work with neighbouring authorities to meet full identified housing needs throughout the Plan period as a whole, as also set out in response to the Suffolk Coastal emerging Local Plan (refer to Appendix C).

Policy CS7: The Amount of New Housing Required

- 2.5 Within Policy CS7, the Council state that the housing requirement will be stepped to reflect when delivery of the Ipswich Garden Suburb is expected to take place.
- 2.6 The Council propose a housing target of 300 dwellings per annum (dpa) for the first six years, increasing to 518 dpa for the remainder of the Plan period, with the majority of this to be delivered through the Ipswich Garden Suburb.
- 2.7 A housing trajectory does not appear to have been published as part of the Local Plan or within the evidence base, so it is unclear whether the approach of the stepped

trajectory is justified or if a greater amount of housing could be delivered in the early part of the Plan period. A housing trajectory is a key part of a Local Plan in identifying if sufficient housing will come forward over the Plan period. It allows the Council, and all other parties, to identify if there are any parts of the Plan period where the delivery of housing might be less than the identified need. Without the trajectory, the rate of delivery simply cannot be known. This is a significant failure of the current Plan and renders it ineffective.

- 2.8 The Site promoted by Bloor Homes can deliver a smaller scale housing development of around 200 homes within the first part of the Plan period, subject to joint working with East Suffolk Council, and could assist in providing a higher level of delivery. Without full consideration of this and working together with the neighbouring authorities to increase delivery, the current approach of the stepped trajectory has not been justified and is unsound.
- 2.9 Furthermore, given the reliance of the Local Plan on the Ipswich Garden Suburb to meet housing need, if it is delayed, housing delivery in Ipswich will be significantly reduced compared to what is currently anticipated. If the stepped trajectory is adopted, this under delivery in the early part of the Plan period will not be rectified for a longer period of time, with housing need continually not being met.
- 2.10 In order for the proposed strategy to be justified and effective, the full housing trajectory should be made available and the Council should consider other opportunities to meet a greater amount of housing need within the early part of the Plan period and reduce reliance on the Ipswich Garden Suburb in the medium and long term.
- 2.11 We would further question the overall housing requirement and whether the Council have adequately considered whether this should be uplifted to support economic growth.
- 2.12 Paragraph 8.168 of the Local Plan sets out the Council have selected an ‘aspirational but deliverable’ jobs target of 9,500 jobs, due to the lower levels of housing growth under the standard method and the reduction in jobs forecast in the 2017 EEFM. This strongly suggests the Council have taken the standard method for housing need as a given without considering any uplift to support economic growth.

2.13 Paragraph 35 of the NPPF is clear that the standard method is a minimum target, which can be increased if desired by the Council. Increasing the housing need to support economic growth is a justified approach, which the Council do not seem have considered. In not considering such an uplift, the Local Plan is not fully positively prepared and may frustrate economic growth.

Policy CS12: Affordable Housing

2.14 The Council recognise early in the Local Plan that affordable housing is a key issue, as set out in Table 2 of the Plan, which identifies that Ipswich has the highest affordable housing need within the Housing Market Area (HMA).

2.15 The Strategic Housing Market Assessment (SHMA) 2017 identified a need of 239 affordable dwellings per year. The emerging Local Plan sets out that this represents around 50% of the total need identified through the standard method, with paragraph 8.151 further recognising that development viability is challenging in Ipswich.

2.16 To seek to meet this affordable housing need, Policy CS12 seeks ‘at least 15%’ affordable housing provision on sites for 15 houses or more (or sites more than 0.5 ha), and 30% on Ipswich Garden Suburb and at the northern end of Humber Doucy Lane.

2.17 However, based on the affordable percentages and housing allocated in the plan, a total of 1,647 affordable dwellings would be provided (assuming 30% on the Garden Suburb and Humber Doucy Lane and 15% on all other sites including windfall). In all likelihood this is overly optimistic given that most windfall sites are likely to be small and fall below the threshold set in Policy CS12, as recognised within Policy CS7.

2.18 Based on the need of 239 dwellings per year set out in the SHMA, this would result in 38% of the affordable need having been met over the Plan period.

2.19 This does not provide sufficient provision for affordable housing as per paragraph 20 of the NPPF, which specifies that strategic policies should make sufficient provision for housing, including affordable housing.

- 2.20 In addition, contrary to the Planning Practice Guidance (PPG), there does not appear to be any consideration of whether to uplift the housing requirement or seek to provide a greater level of housing to assist in meeting this affordable shortfall. The PPG is clear that ‘an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes’¹.
- 2.21 As such, the strategy of meeting affordable housing need within the emerging Local Plan is not positively prepared, justified as an appropriate strategy, effective or consistent with national policy.
- 2.22 We consider the Council should have taken the opportunity to consider if any other sites could come forward over the Local Plan period to assist with meeting affordable housing need. The Site at Humber Doucy Lane, as promoted by Bloor Homes, can come forward to provide market and affordable housing.
- 2.23 There is an opportunity for a shorter term smaller scale development of around 200 houses, with a larger scale development in the medium term, with the potential for approximately 1,200 further dwellings. We recognise that with the majority of land being in East Suffolk, there will need to be a cross boundary approach from both Councils to deliver such schemes. We therefore encourage both Councils to work proactively with one another, as also set out in responses to the emerging Suffolk Coastal Local Plan (Appendix C).
- 2.24 Such a development could therefore deliver a significant amount of new market and affordable housing. Whilst the majority of the Site is located within the administrative boundary of East Suffolk Council, Ipswich is very constrained regarding future growth and both Councils should work together to deliver this additional housing to seek to meet more of the affordable housing need arising from Ipswich.
- 2.25 Such an approach would be more consistent with paragraph 26 of the NPPF, which states Council should work together, with particular reference to whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

¹ Reference ID: 67-008-20190722

Policy CS8: Housing Type and Tenure

- 2.26 Policy CS8 seeks a diverse range of housing tenures to support the creation of mixed and balanced communities. In principle this is in accordance with national policy, with the NPPF being clear from the outset that sustainable development includes ‘ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations’ (paragraph 8). The PPG also includes a specific section on addressing the need for different types of housing and is clear that the standard method identifies an overall minimum average housing figure, but does not break this down into the needs of different groups.² The PPG therefore provides guidance on assessing the housing needs for various different groups.

- 2.27 The supporting text to Policy CS8 sets out that the SHMA identified that the greatest need for market housing is at least 3 bedrooms, with paragraph 8.121 stating that central sites should be high density containing a higher proportion of flats; sites in, or close to, district centres should be medium density with a mix of flats and houses or town houses; and sites elsewhere should be low density with a higher proportion of houses.

- 2.28 Despite Policy CS8 seeking a mix of housing to meet the identified needs, the site allocations identified do not appear to meet this intention, as set out below, contrary to national policy.

- 2.29 The emerging Local Plan seeks to provide allocations for an additional 6,100 homes, based on 1,910 homes already being under construction, with planning permission or a resolution to grant. Of the allocations, 2,750 are to be provided on sites as set out in the Site Allocations and Policies Development Plan Document (DPD).

- 2.30 A review of the allocations within the DPD identifies the total number of dwellings compared to the stated density as follows:

Density	Number of Dwellings	% of Dwellings
High (over 90dph)	1,672	61
Medium (40-90dph)	710	26
Low (below 40dph)	368	13

² Reference ID: 67-001-20190722

- 2.31 As shown above, 61% of dwellings proposed within the DPD are at a high density. As recognised in paragraph 8.121 of the Local Plan, these will be primarily flats. They are likely to be 1 and 2 bedroom flats given the densities proposed and to meet the overall number of houses proposed on these sites. With such a high number and proportion of the dwellings being flats, there is a risk that the market becomes over saturated with smaller flats.
- 2.32 With only 13% of dwellings to be low density and predominantly houses, we question if this will meet the actual housing mix identified in qualitative terms as well as simply meeting the overall need figure.
- 2.33 Whilst Ipswich Garden Suburb and the allocation north of Humber Doucy Lane could deliver more of a mix of houses, these are not expected to start delivering houses until at least 2024. Without sites to provide needed family housing coming forward earlier in the Plan period, there is the potential for an under-delivery of the homes needed which is not positively prepared, justified, effective or consistent with national policy and renders the emerging Local Plan unsound in this regard.
- 2.34 Paragraph 61 of the NPPF is clear that “the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies”. Paragraph 61 gives examples of different groups, including those who require affordable housing, families with children and older people. As set out, the emerging Local Plan is not currently consistent with paragraph 61 of the NPPF as the policies within it do not reflect the type of housing needed for different groups in the community
- 2.35 As set out above, the Site promoted by Bloor Homes at Humber Doucy Lane can deliver housing in the short and medium term subject to joint working between Ipswich and East Suffolk Councils. This can be a mix of housing, including houses with 3 or more bedrooms to meet the identified needs within Ipswich. Allocating the Site for this purpose and committing to working with East Suffolk Council to bring forward the larger part of the Site would assist in overcoming the soundness issue identified as it would seek to meet the identified needs of the area.

3.0 The Context for Growth in the Ipswich Strategic Planning Area, and Cross-Boundary Development

- 3.1 As noted earlier within this representation, given that the administrative boundary of Ipswich Borough constrains the existing town, it is of critical importance that the Local Plan be based on effective joint working with neighbouring authorities.
- 3.2 It is recognised that the four authorities which comprise the wider Ipswich Housing Market Area are progressing joint work through the Ipswich Strategic Planning Area Board (formerly the Ipswich Policy Area) on the strategic cross-boundary issues affecting the four authorities.
- 3.3 This was a matter which was recognised in 2017 in the Inspector's Report on the now adopted Ipswich Local Plan, in which the Inspector stated:

*“Given my concerns about the robustness of the 13550 OAN there is an urgent need for the Council to work with its neighbouring authorities to produce a fit-for-purpose objective assessment of need for new housing for the Ipswich Housing Market Area. This conclusion is consistent with my Interim Findings published in April 2016 following the initial Examination hearings but also has regard to the subsequently-published 2014-based household projections. Thus, and in line with the Memorandum of Understanding detailed in the assessment of the Duty to Co-operate, **MM4 - MM6** (policies CS6 and CS7) commit the Council to working with its neighbours to prepare an updated OAN for housing for the HMA as a whole, a strategy for the distribution of it between the constituent districts and the adoption of joint or aligned local plans to deliver this by 2019. These modifications are thus necessary for the soundness of the plan...” (paragraph 28).*

“However, the Council contends that appropriate, available and deliverable housing sites within Ipswich itself would only deliver 9777 dwellings during the plan period. Whilst with reference to specific sites there is some challenge to this figure, there is nothing to give confidence that substantially more than this number of dwellings can be delivered in the town to 2031. Based on all that I have read and heard, considered in the round and notwithstanding the 2014-based household projection figure, I conclude that it is highly likely that the forthcoming work will identify that the OAN

for Ipswich for the period to 2031 is at least equivalent to the 9777 dwellings which the Council contends can be delivered in this period” (paragraph 29).

- 3.4 The four authorities have prepared a Statement of Common Ground (2018) (‘the SoCG’) which recognises *inter alia* the potential for cross boundary development to meet needs. Section D of the SoCG (titled ‘Consideration of bordering strategic housing development) includes the following statement:

“Due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich Borough boundary”.

- 3.5 The Site clearly falls into the category of a potential cross-boundary opportunity (Ipswich Borough and East Suffolk (formerly Suffolk Coastal)) for development.

- 3.6 The Suffolk Coastal Local Plan is very advanced, having undergone examination and with the Examination Inspector having written to the Council on 31st January 2020 to confirm that, subject to main modifications identified, the Local Plan was “likely” to be found sound and legally compliant.

- 3.7 The submitted Suffolk Coastal Local Plan Key Diagram identifies an area to the east of Ipswich (‘East of Ipswich’) as a Major Centre. The Site is clearly commensurate with the East of Ipswich Major Centre.

- 3.8 Policy SCLP3.2 of the submitted Suffolk Coastal Local Plan confirms that Major Centres are at the top of the District’s settlement hierarchy and that ‘East of Ipswich’ includes Kesgrave, Martlesham Heath, Brightwell Lakes, Purdis Farm, and Rushmere St Andrew (excluding village).

- 3.9 Notwithstanding the identification of the East of Ipswich as a Major Centre in the emerging Suffolk Coastal Local Plan, it only allocates one site (‘Land at Humber Doucy Lane’ (Policy SCLP12.24)) for residential development within this area.

- 3.10 The emerging Suffolk Coastal Local Plan's ability to effectively address Ipswich's housing needs through cross-boundary development was a matter of concern raised through the examination process. In particular, there was concern in respect of Policy SCLP2.1 ('Growth in the Ipswich Strategic Planning Area') and whether this would be effective in ensuring development needs would be sustainably met, where this involved cross-boundary cooperation. In the Examination Inspector's post-hearing letter of 31st January 2020, he suggested that Policy SCLP2.1 of the emerging Local Plan should be amended to make clear that an immediate review of the plan would be undertaken in the event that there was an unmet need arising in a neighbouring area, acknowledging the potential for such an issue to arise.
- 3.11 The emerging Ipswich Local Plan aligns with the Suffolk Coastal Local Plan in that both identify the general location of the Site as sustainable for growth. However, when one considers the detailed strategy and allocation of both the emerging Local Plan for Ipswich and that of the Suffolk Coastal Local Plan, it is clear that the plans are not as joined up as they may ostensibly appear.
- 3.12 Appendix D shows the proposed allocations in the emerging Local Plans of Ipswich and Suffolk Coastal in the East of Ipswich area. This suggests a lack of a coordinated approach, with allocations proposed within Ipswich Borough including those which abruptly terminate at the administrative boundary.
- 3.13 We remain concerned that the spatial strategy has been unduly influenced by the administrative boundary, exemplified by the January 2020 Strategic Housing and Economic Land Availability Assessment (SHELAA) having only assessed the element of the Site that lies within Ipswich Borough. A sustainable and deliverable opportunity to facilitate growth of Ipswich through development of the Site has been overlooked and rejected without justification.

4.0 The Site – Land at Humber Doucy Lane

- 4.1 As set out above, the Site at Humber Doucy Lane is being promoted by Bloor Homes for a residential development.
- 4.2 The Site measures in total approximately 115 ha, but can be divided into two separate areas – one to the south of Lamberts Lane (approximately 13.5 ha) and the other much larger parcel of land to the north. The residential development of the Site could be phased, and the smaller parcel brought forward earlier and independently from the larger parcel, if required. This smaller parcel clearly has strong potential to form an extension to existing residential areas within Ipswich and form an extension to the existing community.
- 4.3 The current allocations to the north east of Ipswich under Policy ISPA4 follow the administrative boundary of Ipswich, which does not follow any distinctive features on the ground. The boundary is purely arbitrary and having development simply follow this does not create a logical pattern of development. It is noted that within the emerging Suffolk Coastal Local Plan, a site is allocated for residential development under Policy SCLP12.24, but this will leave the arbitrary boundary. This is demonstrated on the map in Appendix D.
- 4.4 The Site has the potential to help meet housing needs within a location (East of Ipswich) which has already been tested through the plan-making process (the Suffolk Coastal Local Plan) and found to be a sustainable location for growth, as a more urbanised area. It would form a logical extension to Ipswich, the largest centre in the housing market area, in which there is a substantial range of facilities, services and employment opportunities.
- 4.5 With Ipswich being such a key centre for the Suffolk area, the Council should be ambitious to seek to ensure its long term success. Additional growth can support Ipswich town centre and help its longevity as a prosperous centre.
- 4.6 The Site can deliver approximately 200 homes in the shorter term on land partly within the Ipswich administrative boundary, and can deliver a further approximately 1,200 homes in the medium term on land within the administrative boundary of East Suffolk Council.

- 4.7 As set out in the Highways Technical Note at Appendix E, this level of growth can be delivered via an access from Humber Doucy Lane.
- 4.8 Objective 6 of the emerging Local Plan is to improve transport and connectivity within the Ipswich area. The Ipswich Northern Relief Road has been proposed and explored as one potential option for achieving this, with the proposed inner route partly crossing the land within Bloor Homes' control.
- 4.9 As confirmed in the Highways Technical Note at Appendix E, the development of the Site can be delivered both with and without delivery of the Northern Relief Road. Whilst we understand that Suffolk County Council are not proceeding with the next stage of the business case into the Northern Relief Road, as confirmed at the Cabinet meeting on 25th February 2020, should this change in the future, the proposed Site can assist in the delivery of the Road. With Bloor Homes controlling a large part of the land to the north of Humber Doucy Lane, it is uniquely placed to be able to assist in the delivery of a relief road if required in the future.
- 4.10 Further to the above, we note that Policy ISPA2 of the emerging Local Plan (which sets out the Council's strategic infrastructure priorities and a commitment to working with other partners to support and enable the delivery of key strategic infrastructure) states the Council support work to investigate the feasibility of an Ipswich Northern Route, with supporting text 8.19 referring to a strong preference for the inner route, which crosses the site. It sets out that the next review of the Local Plan will consider the implications of any decision about the route in more detail, including the extent to which the options must support potential future housing and employment growth. The principle of such approach is supported, but in order for the policy to be effective, it is important that the spatial strategy helps facilitate such objectives rather than to undermine their delivery.
- 4.11 Development at the Site can deliver new market and affordable homes, alongside new community facilities including local centres, employment and education. Significant areas of new open space and new planting can also be provided.
- 4.12 As set out, a first phase of development can be provided in the short term to assist with the delivery of both market and affordable housing. This is particularly pertinent given that the Council are proposing a stepped trajectory with a lower requirement in the

early part of the Plan period. Allocating the site for development and committing to working with East Suffolk Council would be a positive and proactive approach to seeking to meet housing need in both the short and medium term.

- 4.13 We note that 1.57ha of the site within the boundary of Ipswich Borough was considered in the January 2020 SHELAA, and was found not to be currently developable. It is notable that the Site scored green and amber in relation to the constraints and impacts considered in the SHELAA, with none red. The site was found not to be suitable and achievable due to the need to retain the separate identity of Rushmere village, and if drainage, access and infrastructure constraints could be overcome.
- 4.14 We do not consider this assessment of the Site to provide robust justification for its rejection as a residential development site.
- 4.15 As set out in the Highways Technical Note at Appendix E, suitable access can be achieved from Humber Doucy Lane and it is considered the Site could be developed without having an adverse impact on the wider highway network. As shown on the Indicative Masterplan Framework at Appendix B, the Site can be drained by sustainable drainage methods. The drainage, access and infrastructure constraints mentioned in the SHELAA can be overcome and are not constraints to development.
- 4.16 In terms of the need to retain the separate identity of Rushmere village, open space can be provided within the wider Site to ensure there are no concerns of coalescence. As shown on the Indicative Masterplan Framework, the wider Site can provide significant areas of open space in the form of a community orchard, SuDS ponds, meadow parkland, sports pitches and so on, with significant amounts of new planting. The site can therefore protect the separate identity of Rushmere and ensure there is no coalescence with Ipswich.
- 4.17 We also note that the SHELAA does not consider the wider site promoted by Bloor Homes. Although only 1.57ha of the site lies within the administrative boundary of Ipswich, this is an arbitrary boundary that does not necessarily relate to any demarcations on the ground.
- 4.18 As set out elsewhere in these representations, the Ipswich administrative area is very constrained in terms of its boundary, and with there being a high unmet affordable

housing need and concerns about the housing mix and proposed delivery within the emerging Local Plan, the Council should be looking at all opportunities to provide additional housing.

4.19 Given the constraints of the Ipswich boundary, the Council should be looking to neighbouring authorities to assist. Land at Humber Doucy Lane is one such area where there is a sustainable and suitable option for cross boundary development. The Council should therefore have considered this option within the SHELAA to ensure all options have been explored and the approach is positively prepared.

4.20 We do not consider the Site has been subject to a robust assessment, and this has resulted in a sustainable option for growth for Ipswich being rejected without justification.

5.0 Sustainability Appraisal

- 5.1 The preparation of a Sustainability Appraisal to inform the Local Plan is a legal requirement, as per the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations').
- 5.2 The emerging Local Plan is accompanied by a Sustainability Appraisal ('the SA/SEA'). However, we have concerns with the SE/SEA and the approach to assessing the Spatial Options.
- 5.3 Appendix F sets out our full concerns. In summary, the SA has not considered the spatial strategy actually set out in the Local Plan. An option has been assessed which the Council consider to be close to the spatial strategy chosen, but they are different.
- 5.4 Furthermore, Spatial Option 2 in the SA considers increasing development beyond the Borough boundary. As set out in Appendix E, we have numerous concerns with some of the assessment of Spatial Option 2 and how the scoring has been derived. Overall it appears that Spatial Option 2 has been scored much more poorly than it should have, leading to a worse overall assessment of the option.
- 5.5 It appears that Spatial Option 1, the option most closely aligned with the spatial strategy in the Local Plan, has been scored unjustly positively in some areas, and Spatial Option 2 has been scored more poorly.
- 5.6 As such, the SA prepared alongside the emerging Local Plan does not provide the necessary justification of the proposed spatial strategy.
- 5.7 To rectify this issue of soundness, the SA should be updated to address the above and the Council should subsequently review whether the strategy proposed is suitable and whether the reason for rejecting alternatives is still applicable.

6.0 Conclusion

6.1 The Site subject to this representation provides both a shorter term and medium term opportunity for new housing to meet identified needs alongside other infrastructure, open spaces and new planting. Ipswich and East Suffolk Councils should both work positively together to bring such a development forward.

6.2 It is submitted that the Local Plan is not positively prepared, justified, effective or consistent with national policy for the following reasons:

a) The Plan has not been Positively Prepared

The Plan fails to fully address the cross-boundary opportunities for providing sustainable patterns of growth in the Plan period. Such an approach and strategy would clearly be of benefit to both Ipswich and East Suffolk.

With the lack of a housing trajectory having been published, it is unclear whether the Plan does meet identified needs over the Plan period or if there are any times when housing delivery is expected to reduce below the need. The proposed stepped trajectory under Policy CS7 suggests there are concerns with regard to consistently meeting the full housing need.

The proposed strategy does not provide sufficient affordable housing to meet the full identified needs, with there not appearing to be any consideration of whether to uplift the housing target to meet more of this need. This is highlighted within Policy CS12.

b) The Plan is not Justified

Policies CS7, CS12 and CS8 raise concerns in this regard, as the chosen strategy does not seek to provide sufficient affordable housing or the housing that is needed within Ipswich, i.e. 3-bed houses rather than 1-bed flats. Concerns are also raised in relation to the SA, as set out in full in Appendix E, which does not appear to appropriately assess the Spatial Options presented.

c) The Plan is not Effective

As set out, we do not consider that the Local Plan is effective in working with neighbouring authorities on cross boundary opportunities to deliver sufficient housing of the type and tenure to meet the identified needs.

d) The Plan is not Consistent with National Policy

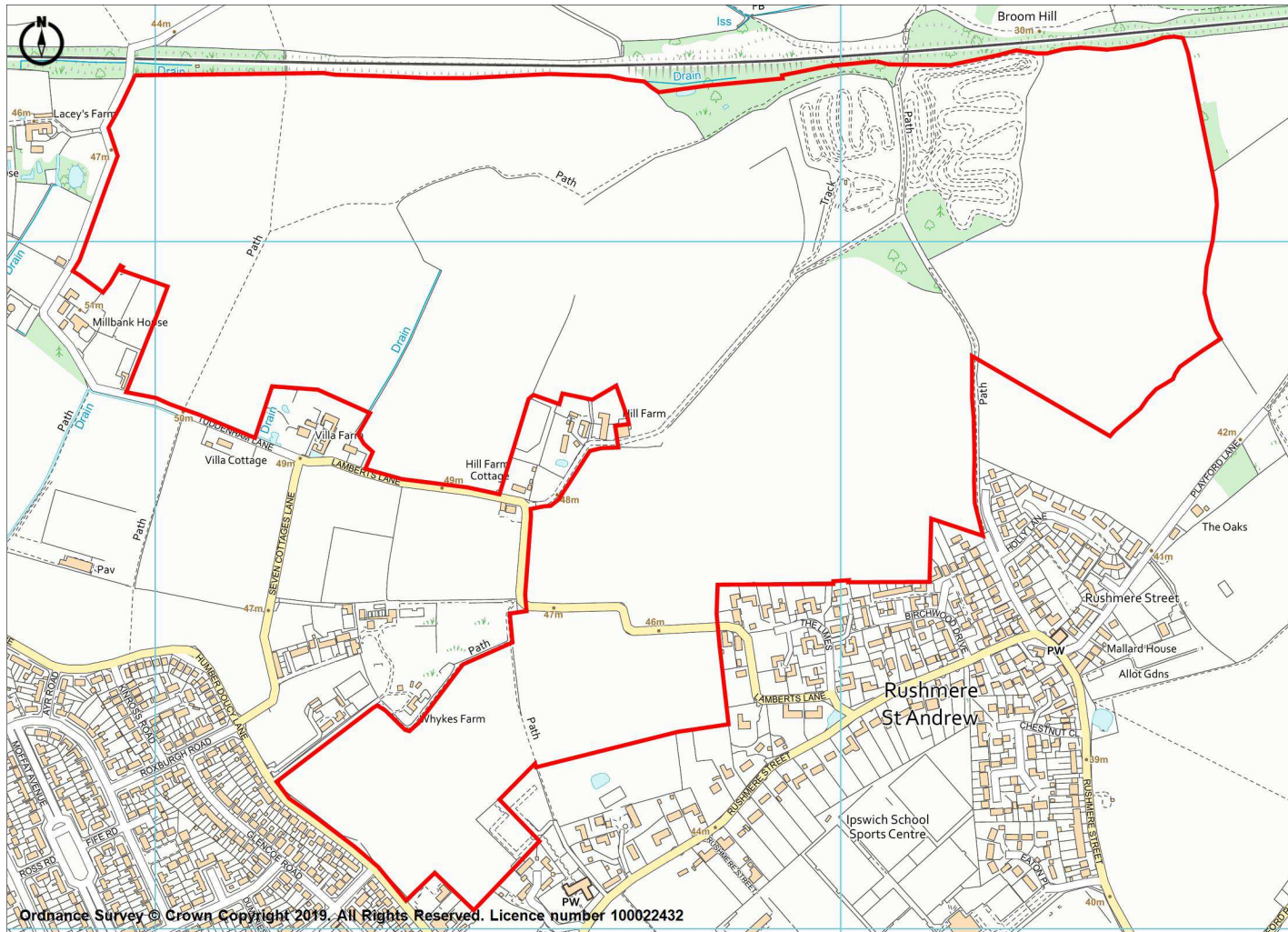
Given the failures of the Plan to provide the type of housing that people within the Borough need, provide sufficient affordable housing and adequately work with neighbouring authorities, it is not fully consistent with national policy.

- 6.3 We consider that the Council should take the opportunity to work with East Suffolk Council to identify and deliver a cross boundary development to provide housing to meet identified needs across the Plan period. At the minimum, the Council should include a commitment to an early review of the Plan if unmet needs are identified.

Appendices

Appendix A

Site Location Plan - Rushmere St. Andrews, Humber Doucy Lane



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Plotted Scale - 1:10000. Paper Size - A4



Appendix B



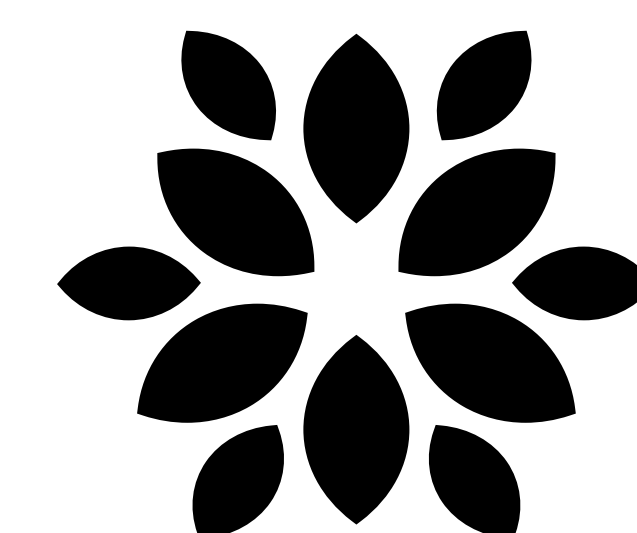
N
 ◆
 Considerations

- Red line
- +++++ Railway
- A - Road
- B - Road
- Minor road
- Track on site

- ⋯⋯⋯ Public Right of Way
- ▶▶▶▶▶ Downward slope
- ⚡ Noise pollution
- Required junction improvement
- Required road improvement
- - - - - Potential cycle lane
- Local authority boundary

- Contours (5M)
- ▨ Priority habitat - deciduous woodland
- ▨ Rushmere MX track
- ✳ Listed building
- ✳ Orchard

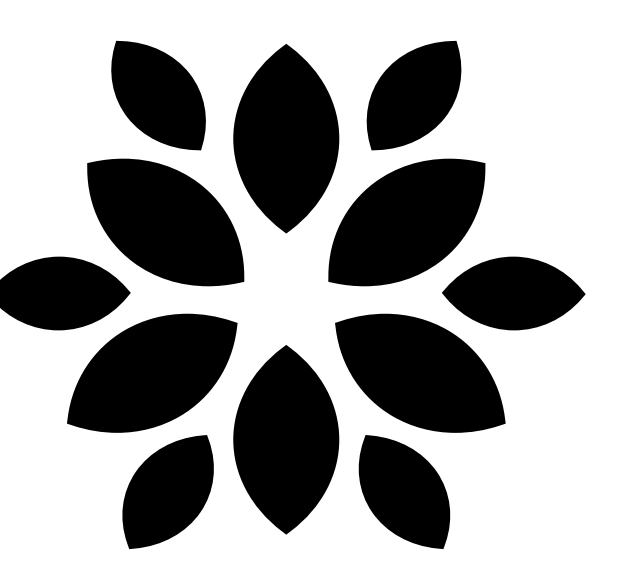
**LAND AT
 HUMBER
 DOUCY LANE**



BLOOR HOMES

MOSAIC
 Urban Design & Masterplanning

mode



- Red line
- Development inside the red line
- Potential phase 1
- Development outside of Bloor control
- Potential main road/future bypass route
- Local centre
- Area of employment
- Primary school



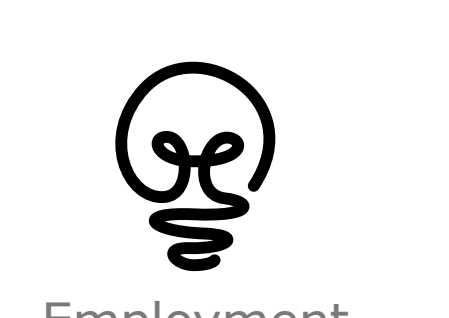
2-2,500 new homes at 35dph



New community facilities including 3-4 local centres



4-5 primary school forms of entry and a secondary school



Employment

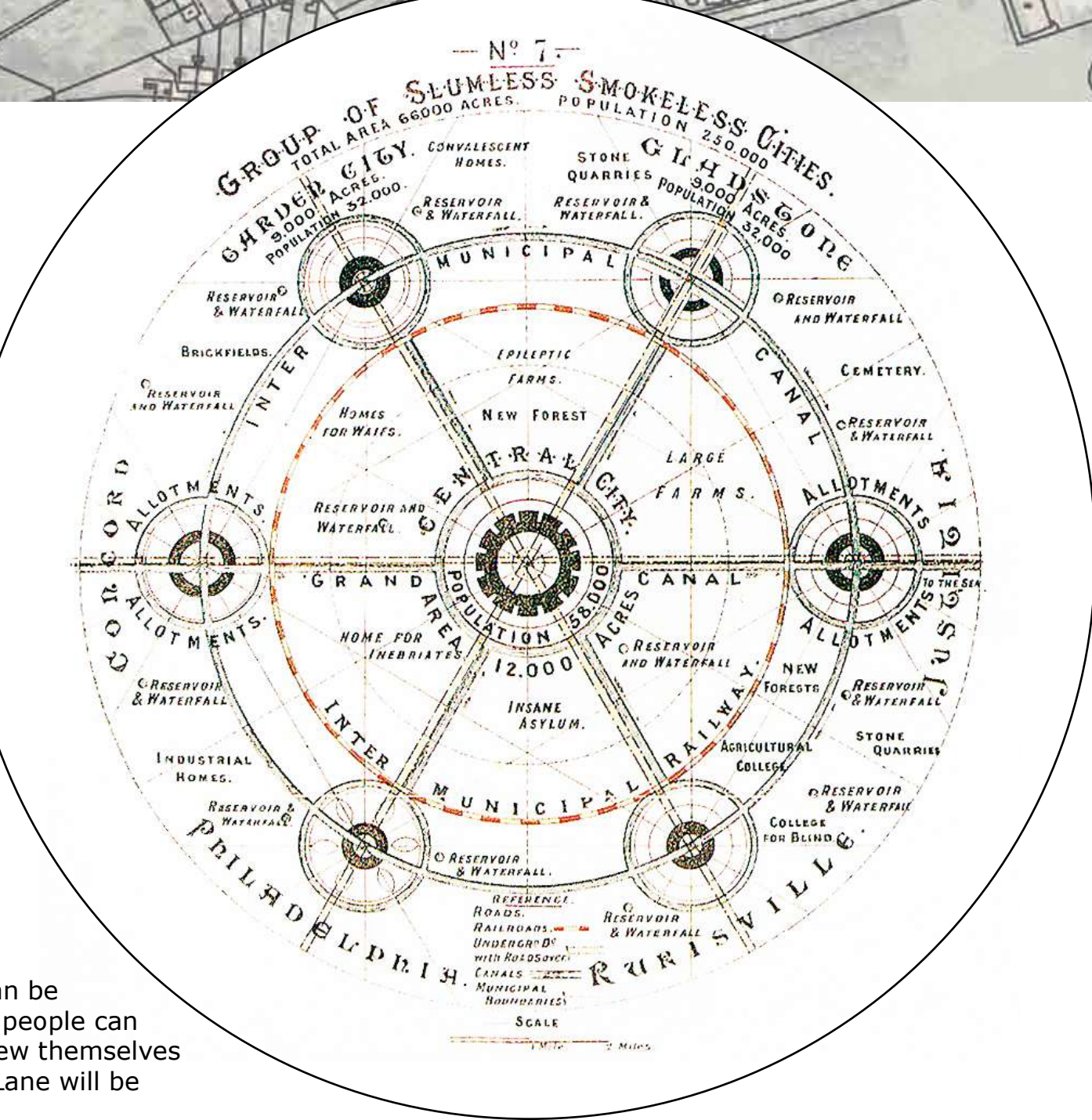
OPPORTUNITY

A Garden Community

The revised National Planning Policy Framework was published on 24 July 2018 and sets out the government's planning policies for England and how these are expected to be applied.

The National Planning Policy Framework (NPPF) recommends Local Authorities plan for larger scale development (new settlements or extensions) following the principles of Garden Cities. In response to the Government's Garden communities: prospectus we intend to submit the Land at Humber Doucy Lane for consideration.

The Land at Humber Doucy Lane will not be a dormitory community, or a place which just uses 'garden' as a convenient label. We will set clear expectations for the quality of the development and how this can be maintained. We want to see a vibrant, mixed-use, community where people can live, work, and play for generations to come – a community which view themselves as the conservation areas of the future. The Land at Humber Doucy Lane will be holistically planned, self-sustaining, and characterful.



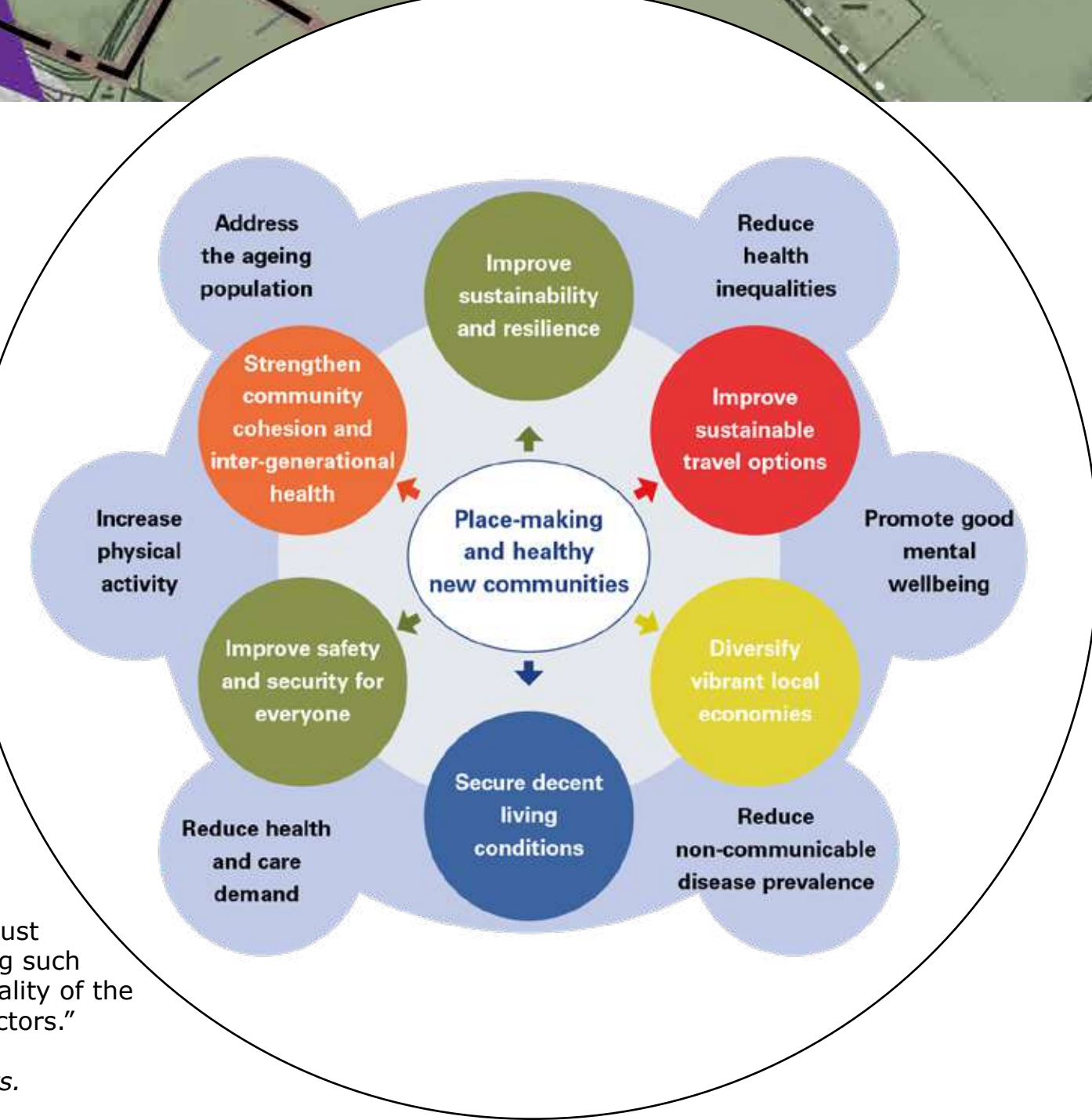
A Healthy Community

The NPPF states planning policies and decisions should aim to achieve healthy, inclusive and safe places.

"When taking a place-based approach, healthy developments will not only help the local authority to improve population health in terms of both physical and mental wellbeing, but will also help in achieving multiple local objectives and priorities within the wider place-making agenda, such as improving road safety, reducing air pollution, maximising environmental protection, or securing infrastructure investment to attract new residents and a skilled working population. Meeting these wider objectives can result in attracting the right workforce to work in the health and care system and in other local industries."

All this makes creating a high-quality living environment more than just a matter of addressing issues that adversely affect health. Addressing such multiple local priorities can also help to promote good health: the quality of the environment and the local socioeconomic context are contributing factors."

Source: TCPA, 2017, guide 8 creating health promoting environments.

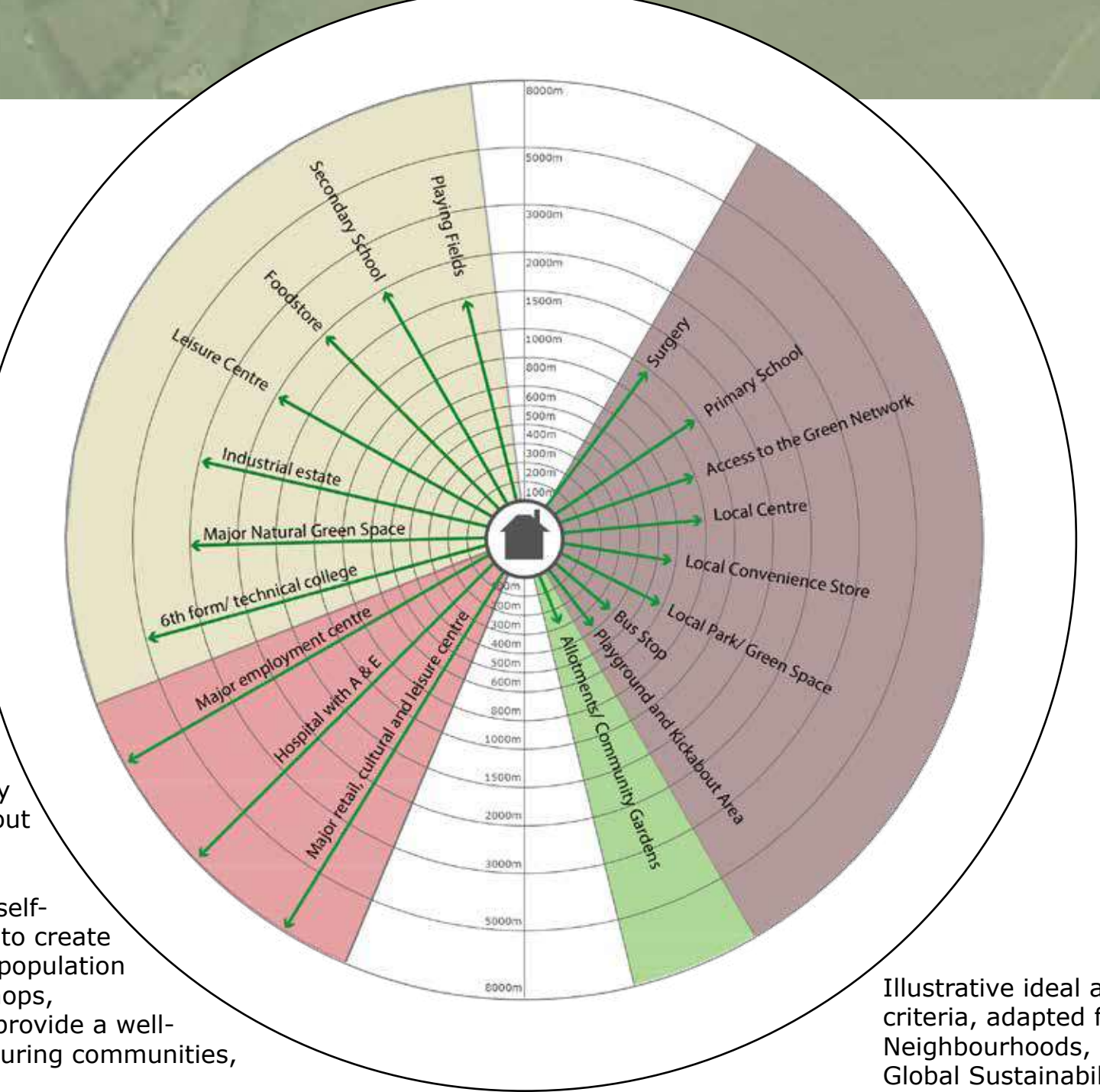
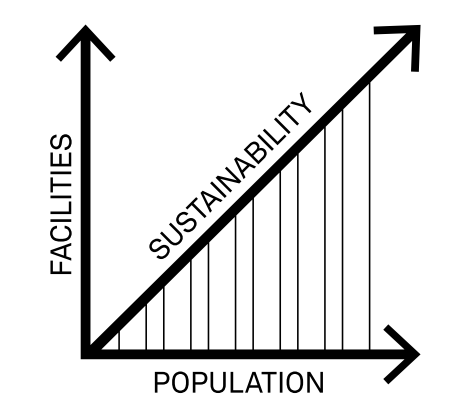


A Complete Community

Access to local facilities is fundamental to the concept of locating sustainable development.

New development needs the full range of social, retail, educational, health, transport and recreational facilities to allow people, especially those of limited means or mobility, to go about their daily lives without over reliance on a private car.

If well planned, the Land at Humber Doucy Lane, Ipswich, can be a self-sustaining community. The scale of the site presents an opportunity to create a new healthy garden community of approximately 5,000 people. A population of this order is enough to trigger a full range of facilities including shops, employment, leisure and education on-site to support daily life and provide a well-rounded community that meet the needs of its citizens, and neighbouring communities, over their lifetime.











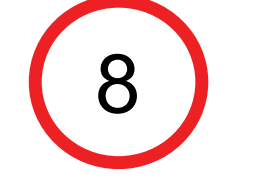




Illustrative Ideal accessibility criteria, adapted from 'Shaping Neighbourhoods, for Local Health and Global Sustainability'.



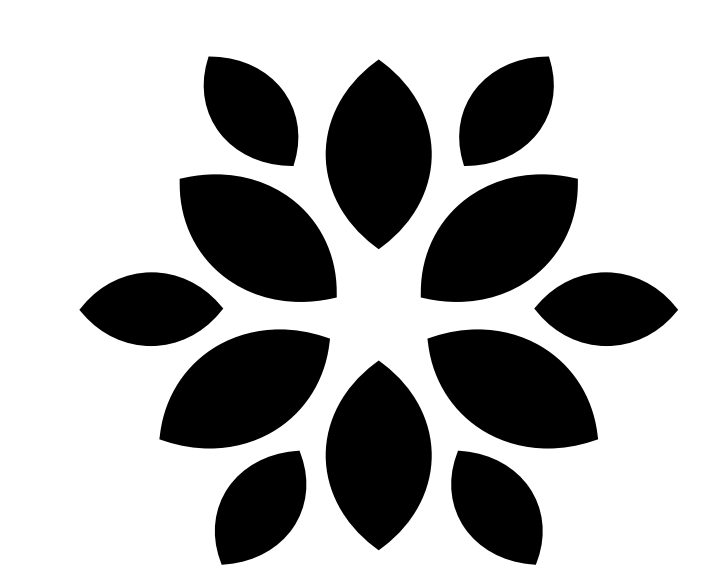


N
Phase One
 Indicative Masterplan Framework

-  Red line
-  Public Right of Way
-  Local authority boundary

- | | | |
|---|---|---|
|  1 Site access |  4 SUDS Pond |  7 Structural planting |
|  2 Public footpath |  5 Neighbourhood green |  8 Meadow parkland |
|  3 Community orchard |  6 Mixed-use |  9 Active sports |
| | |  10 Emergency access |

**LAND AT
 HUMBER
 DOUCY LANE**



BLOOR HOMES

MOSAIC
 Urban Design & Masterplanning

mode

Appendix C



SUFFOLK COASTAL LOCAL PLAN

EXAMINATION HEARING STATEMENT

FOR HEARING SESSION ON 20 AUGUST 2019

MATTER 2A – HOUSING PROVISION

Prepared by Strutt & Parker on behalf of Bloor Homes Eastern

July 2019

Site Name:	Land North of Humber Doucy Lane and South of Lamberts Lane, Rushmere St Andrew, Ipswich
Client Name:	Bloor Homes Eastern
Type of Report:	Hearing Statement – Matter 2A
Prepared by:	Derek Stebbing BA(Hons) DiP EP MRTPI
Approved by:	Andrew Butcher Dip TP. MRTPI
Date:	31 st July 2019

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Matter 2A – Housing Provision

1.0 Introduction

- 1.1 Strutt & Parker are instructed by Bloor Homes Eastern to submit this Hearing Statement to the Examination for the Suffolk Coastal Local Plan (2018-2036). Previous submissions on behalf of our clients have been made to the Suffolk Coastal District Council (now part of East Suffolk Council) throughout the emerging Local Plan process.
- 1.2 Bloor Homes Eastern are promoting the residential allocation of the land to the north east of Humber Doucy Lane and Lamberts Lane, Rushmere St Andrew, Ipswich. The land was referenced by the Council as Sites 1087 and 1145 in earlier Local Plan Consultation documents and was assessed in the Initial Sustainability Appraisal. A Location Plan outlining the site and Draft Masterplan accompanies this representation.
- 1.3 The overall site is approximately 115 hectares in size and comprises two potential residential development allocations, the first being the short-term delivery comprising of 13.5 hectares of land north east of Humber Doucy Lane; and the second comprising the remaining land, which lies to the north east of Lamberts Lane. This is being promoted as a medium-term opportunity by Bloor Homes for a Garden Village development. These opportunities respond to the identified role of the Local Plan in addressing the strategic objectives for the area.
- 1.4 This Hearing Statement is concerned with Matter 2A of the Examination Hearing programme, and specifically addresses Point 2.4 of the Inspector's questions for Matter 2A.

2.0 Point 2.4 Does Policy SCLP2.1 serve a clear purpose and would it be effective?

2.1 Policy SCLP2.1 states as follows :-

Policy SCLP2.1: Growth in the Ipswich Strategic Planning Area

Suffolk Coastal will continue to play a key role in the economic growth of the Ipswich Strategic Planning Area, whilst enhancing quality of life and protecting the high quality environments. Over the period 2018-2036, the Suffolk Coastal Local Plan will contribute to:

- a) The creation of at least 30,320 jobs through the provision of at least 49.8ha of employment land across the Ipswich Functional Economic Area;*
- b) The collective delivery of at least 37,328 dwellings across the Ipswich Housing Market Area; and*
- c) Supporting the continued role of Ipswich as County Town.*

The Council will work actively with the other local planning authorities in the ISPA and with Suffolk County Council to co-ordinate the delivery of development and in monitoring and reviewing evidence as necessary.

2.2 The four authorities of Ipswich Borough Council, Suffolk Coastal District Council, Mid-Suffolk District Council and Babergh District Council are presently progressing joint work through the Ipswich Strategic Planning Area Board (formerly the Ipswich Policy Area) on the strategic cross-boundary issues affecting the four authorities. In particular, with specific relevance to our client's interests, the authorities (following the Inspector's report in 2017 on the Examination of the now adopted Ipswich Local Plan) are working together in order to meet the housing need for the Ipswich Housing Market Area and agree the strategic distribution of development to meet that need.

2.3 In 2017 the Ipswich Local Plan Inspector reported as follows:

"28. Given my concerns about the robustness of the 13550 OAN there is an urgent need for the Council to work with its neighbouring authorities to produce a fit-for-purpose objective assessment of need for new housing for the Ipswich Housing Market Area. This conclusion is consistent with my Interim Findings published in April 2016 following the initial Examination hearings but also has regard to the subsequently-

published 2014-based household projections. Thus, and in line with the Memorandum of Understanding detailed in the assessment of the Duty to Co-operate, MM4 - MM6 (policies CS6 and CS7) commit the Council to working with its neighbours to prepare an updated OAN for housing for the HMA as a whole, a strategy for the distribution of it between the constituent districts and the adoption of joint or aligned local plans to deliver this by 2019.”

and

29. However, the Council contends that appropriate, available and deliverable housing sites within Ipswich itself would only deliver 9777 dwellings during the plan period. Whilst with reference to specific sites there is some challenge to this figure, there is nothing to give confidence that substantially more than this number of dwellings can be delivered in the town to 2031. Based on all that I have read and heard, considered in the round and notwithstanding the 2014-based household projection figure, I conclude that it is highly likely that the forthcoming work will identify that the OAN for Ipswich for the period to 2031 is at least equivalent to the 9777 dwellings which the Council contends can be delivered in this period”

- 2.4 The authorities have prepared a Statement of Common Ground (SoCG) (v4 March 2019) to address the strategic cross-boundary planning matters in the Ipswich Strategic Planning Area. Key extracts from that document regarding the approach to the delivery of the housing requirement are set out below:

“Process of reaching outcomes and agreements

The Ipswich Strategic Planning Area Board provides a mechanism to discuss the authorities’ approach to housing requirements and to inform and guide the approach to be taken within each Local Plan.

C1) The housing need calculated under the standard methodology will form the starting point for identifying housing requirements. The Suffolk Coastal First Draft Local Plan, published for consultation between July and September 2018, was based upon the need figures published by MHCLG in September 2017 under the ‘Planning for the Right Homes in the Right Places’ consultation. The NPPF was published in July 2018 and the Planning Practice Guidance updated in September 2018. The 2017 ratios of median workplace earnings to median house prices were published in April 2018 and the 2016-based household projections were published in September 2018. The Planning Practice Guidance has subsequently been updated in February 2019 to state that the 2014-based household projections should be used in

the calculation. Local housing need as calculated under the standard method will form the starting point in identifying housing requirements.

C2) The standard method will, therefore, also provide the starting point for identifying the total amount of housing to be provided in the Ipswich Housing Market Area.

C3) Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum housing number it is intending to deliver in its own area. Where the need cannot be met within the local authority's boundary, following a comprehensive re-assessment of deliverability the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.

C4) Provision for Gypsies and Travellers – the 2017 Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment identified a need for additional pitches to be provided for Babergh, Mid Suffolk, Ipswich and Suffolk Coastal. Each local planning authority will plan to meet its own need for permanent pitches for Gypsies and Travellers and should have a policy setting out how this will be delivered in its own area. Where the capacity to accommodate pitches cannot be met within the local authority's boundary a comprehensive re-assessment of deliverability will be undertaken and the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.

C5) Mix and type of housing: The Authorities published an update to Part 2 of the Strategic Housing Market Assessment in January 2019. This updates the size, type and tenure of housing needed, including the need for affordable housing, based upon the housing need calculated under the standard method.

C6) *Strategic policies in emerging Local Plans are to reflect the outcomes above.*

D. Consideration of bordering strategic housing developments

Background

Due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich Borough boundary.

Evidence

The Councils have jointly commissioned transport modelling (with Suffolk County Council). The Methodology Report and the Results Report Volume 1: Suffolk Coastal and Ipswich were published in August 2018 as part of the consultation on the Suffolk Coastal First Draft Local Plan. Further transport modelling of preferred options has been undertaken and the Results Report Volume 2: Suffolk Coastal and Ipswich and an updated Methodology Report were published in January 2019. The Councils jointly commissioned a Settlement Sensitivity Assessment in relation to identifying landscape sensitivity around Ipswich. The Strategic Housing and Employment Land Availability Assessments identify sites which border or cross authority boundaries.

Process of reaching outcomes and agreements

The conclusions of the above evidence have been, and will continue to be, considered in site selection and in identifying any necessary mitigation.

Outcomes and agreements

Land north east of Humber Doucy Lane is identified as a cross-border location for future development (within Ipswich Borough and Suffolk Coastal District) for housing delivery post 2031. This joint approach will help enable land within Ipswich Borough to come forward for housing. The relevant policies in Local Plans are:

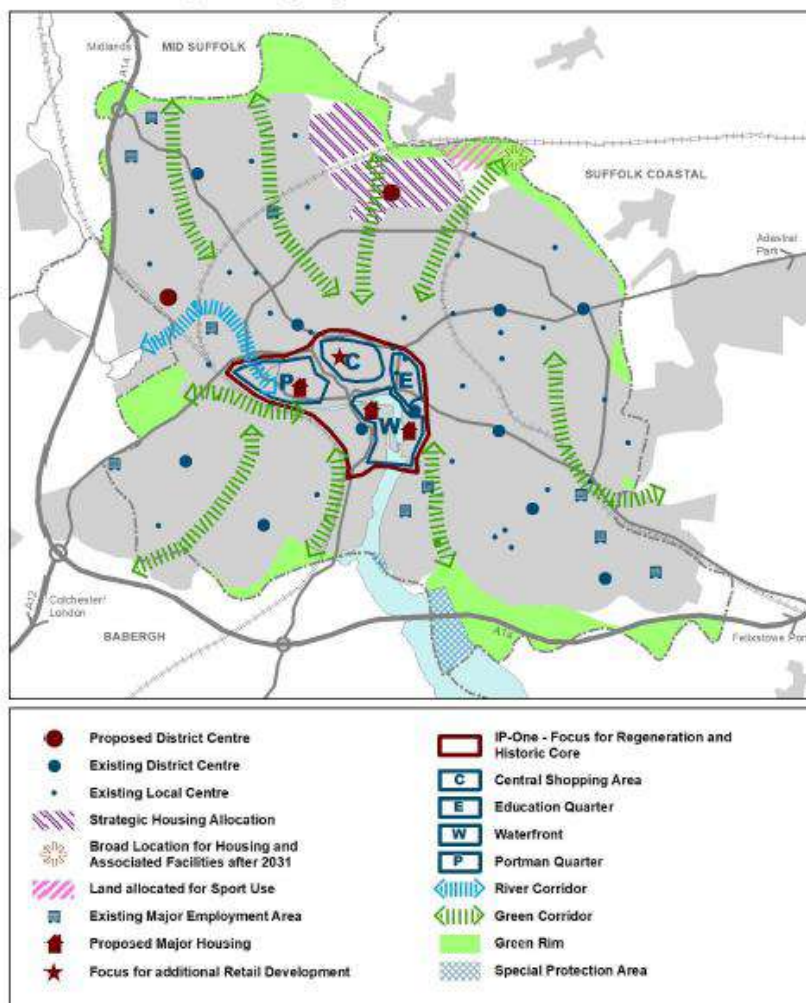
- *Ipswich Core Strategy and Policies DPD Review Preferred Options (November 2018), Policy ISPA4 'Cross Boundary Working to Deliver Sites'*
- *Suffolk Coastal Final Draft Local Plan (January 2019), Policy SCLP12.24 'Land at Humber Doucy Lane, Rushmere St Andrew'*

- 2.5 The key points arising from this strategic cross-boundary co-operation are that the four authorities are presently planning to meet a housing need of 37,278 dwellings up to 2036. Secondly, the SoCG recognises that “due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich borough boundary”.
- 2.6 However, Policy SCLP2.1 as presently drafted fails to provide sufficiently clear and effective strategic policy guidance on the nature of the Plan’s “close functional relationship” with Ipswich Borough. In fact, Section 2 of the Plan entitled “Wider Strategic Planning Area”, containing Policy SCLP2.1, is generally not explicit on the potential strategic cross-boundary issues that will clearly affect both the Suffolk Coastal Local Plan and the emerging Ipswich Local Plan during the respective Plan periods. We give detailed consideration to Policy SCLP12.24 (Land at Humber Doucy Lane) in our Hearing Statement for Matter 3 (Communities surrounding Ipswich). However it should be noted at this point that Policy SCLP12.24 is not set in the context of meeting strategic, long-term cross-boundary objectives. In fact, it was an addition to the Plan’s housing allocations introduced into the Plan at a relatively late stage.
- 2.7 As we understand the position, there is presently no intention by the Suffolk authorities to prepare a statutory or non-statutory Spatial Development Strategy for the Ipswich

Strategic Planning Area. It will therefore fall to the individual Local Plans prepared by the constituent authorities to take forward the strategic policy issues identified by the Ipswich Strategic Planning Area Board.

2.8 In our submission, the Suffolk Coastal Local Plan does not yet address such issues with sufficient clarity, particularly as they will affect the later years of the Plan period. It is clear from the Preferred Options consultation of the emerging Ipswich Local Plan that the Borough Council foresee a long-term strategic direction of growth to the north-east of the existing Ipswich urban area. This is identified on the Key Diagram accompanying that consultation, as below :

DIAGRAM 3: The Ipswich Key Diagram



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2.9 We would suggest that this long-term approach, which clearly indicates the proposed “direction of travel” for the growth of Ipswich, and which has obvious cross-boundary implications with the strategy of the Suffolk Coastal Local Plan, should be reflected with greater clarity in that Plan, and specifically within Policy SCLP2.1.

- 2.10 Furthermore, the recent publication for consultation of three potential routes for the Ipswich Northern Route (the link between the A12 and A14) reinforces the need for the Plan to set out in greater detail the strategic planning context for that link road, which is described in the Factual Note prepared by the Council on 25 July 2019.
- 2.11 Our client's land has key significance for the potential delivery of the Option C route, which is the southernmost and shortest route option. Whilst we clearly support that route option, it is not yet possible to pre-judge the outcome of the ongoing consultation. Nevertheless, we firmly consider that the Plan does need to contain a much clearer and fuller position statement by East Suffolk Council on the strategic planning implications of the proposed Link Road. In our assessment, it clearly recognises and endorses the long-term approach to the future growth of Ipswich, as being indicated in the emerging Ipswich Local Plan, which should be recognised in this Plan.

3. Conclusion and Proposed Change to Submission Local Plan

- 3.1 In the context of the long-term strategic cross-boundary planning matters being addressed by the Ipswich Strategic Planning Area Board, and described above, we do not consider that Policy SCLP2.1 is effective. It presently fails to address cross-boundary matters with sufficient clarity. Specifically, it does not recognise the "direction of travel" for the growth of Ipswich post-2031, being identified in the emerging Ipswich Local Plan, nor the strategic implications of the proposed Ipswich Northern Route, in so far as it will directly support new homes and employment growth.
- 3.2 We consider that the Policy should be modified to reflect the content of the Factual Note published on 25 July 2019, together with a fuller position statement by the Council on its strategic planning objectives for the delivery of the Link Road and the spatial implications for future growth in the Ipswich/Suffolk Coastal Local Plan areas. It is absolutely clear that these are significant cross-boundary matters which should be addressed in the respective Local Plans. We therefore request that the Inspector recommends that such modification be made to the Plan in order to address these points.



SUFFOLK COASTAL LOCAL PLAN

EXAMINATION HEARING STATEMENT

FOR HEARING SESSION ON 21 AUGUST 2019

**MATTER 2C – DISTRIBUTION OF GROWTH AND THE SETTLEMENT
HIERARCHY**

Prepared by Strutt & Parker on behalf of Bloor Homes Eastern

July 2019

Site Name:	Land North of Humber Doucy Lane and South of Lamberts Lane, Rushmere St Andrew, Ipswich
Client Name:	Bloor Homes Eastern
Type of Report:	Hearing Statement – Matter 2C
Prepared by:	Derek Stebbing BA(Hons) DiP EP MRTPI
Approved by:	Andrew Butcher Dip TP. MRTPI
Date:	31 st July 2019

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Matter 2C – Distribution of Growth and the Settlement Hierarchy

1.0 Introduction

- 1.1 Strutt & Parker are instructed by Bloor Homes Eastern to submit this Hearing Statement to the Examination for the Suffolk Coastal Local Plan (2018-2036). Previous submissions on behalf of our clients have been made to the Suffolk Coastal District Council (now part of East Suffolk Council) throughout the emerging Local Plan process.
- 1.2 Bloor Homes Eastern are promoting the residential allocation of the land to the north east of Humber Doucy Lane and Lamberts Lane, Rushmere St Andrew, Ipswich. The land was referenced by the Council as Sites 1087 and 1145 in earlier Local Plan Consultation documents and was assessed in the Initial Sustainability Appraisal. A Location Plan outlining the site and Draft Masterplan accompanies our Hearing Statement for Matter 2A.
- 1.3 The overall site is approximately 115 hectares in size and comprises two potential residential development allocations, the first being the short-term delivery comprising of 13.5 hectares of land north east of Humber Doucy Lane; and the second comprising the remaining land which lies to the north east of Lamberts Lane. This is being promoted by Bloor Homes as a medium-term opportunity for a Garden Village development. These opportunities respond to the identified role of the Local Plan in addressing the strategic objectives for the area.
- 1.4 This Hearing Statement is concerned with Matter 2C of the Examination Hearing programme, and specifically addresses Points 2.17 and 2.18 of the Inspector's questions for Matter 2C.

2.0 Point 2.17 - Is the strategy for growth set out in Policy SCLP3.1 justified and would it be effective in delivering sustainable development?

2.1 Policy SCLP3.1 states as follows :-

Policy SCLP3.1: Strategy for Growth in Suffolk Coastal District

The Council will deliver an ambitious plan for growth over the period 2018 – 2036 in Suffolk Coastal by:

a) Supporting and facilitating economic growth through the supply of significantly more than the baseline requirement of 11.7ha of land for employment uses to deliver at least 6,500 jobs and to enable the key economic activities to maintain and enhance their role within the UK economy;

b) Sustain and support growth in retail, commercial leisure and town centres including facilitating provision towards plan period forecasts of between 4,100 - 5,000 sq m of convenience retail floorspace and between 7,700 – 13,100 sqm of comparison retail floorspace;

c) Significantly boosting the supply of housing, the mix of housing available and the provision of affordable housing, through the delivery of at least 582 new dwellings per annum (at least 10,476 over the period 2018 - 2036);

d) Ensuring the provision of infrastructure needed to support growth;

e) Protecting and enhancing the quality of the historic, built and natural environment across the District.

The strategy for growth will seek to provide opportunities for economic growth and create and enhance sustainable and inclusive communities through:

f) The delivery of new Garden Neighbourhoods at North Felixstowe and South Saxmundham;

g) Utilising opportunities provided by road and rail corridors, including a focus on growth in the A12 and the A14 corridors;

h) New strategic employment allocations based around key transport corridors, including to support the Port of Felixstowe;

i) Strategies for market towns which seek to reflect and strengthen their roles and economies;

j) Appropriate growth in rural areas that will help to support and sustain existing communities.

- 2.2 This Hearing Statement supports our client's case that the Submission Draft Plan pays insufficient regard to the strategic context of meeting the full housing need up to 2036 across the Ipswich Strategic Planning Area, the potential need for Ipswich Borough Council to consider sites beyond its administrative boundaries as part of strategic cross-boundary distribution of housing growth (as reflected in Agreement C3 of the submitted Statement of Common Ground (v4 March 2019) and the fact that part of our client's site falls within the Ipswich Borough Council administrative area.
- 2.3 Policy SCLP3.1 sets out the plan for growth across the district throughout the Plan period, identifying targets and forecasts for delivery across key sectors with a significant boost planned for housing supply. The policy sets a target of delivering at least 10,476 new dwellings throughout the Plan period with the delivery mechanism largely focused on two new garden Neighbourhoods at North Felixstowe and South Saxmundham.
- 2.4 However, the policy and its supporting justification (paragraphs 3.27-3.35) fails to make any specific reference at all to the "East of Ipswich Major Centre" as defined in the Plan's settlement hierarchy (within Policy SCLP3.2). There is no indication that the area is a part of the "Spatial Strategy for Growth" through to 2036 or indeed part of any ongoing strategic cross-boundary considerations with Ipswich Borough Council.
- 2.5 The thrust of our concerns regarding Policy SCLP2.1 is therefore also equally applicable to Policy SCLP3.1, in that the policy fails to recognise the Plan's stated "close functional relationship" with Ipswich Borough.

2.6 Policy SCLP3.1 is therefore defective through its failure to recognise and address the strategic cross-boundary issues arising from the Plan's strategy for growth over the period 2018-2036, and its further failure to take account of the "East of Ipswich Major Centre", either as part of those cross-boundary considerations or as part of the Plan's growth strategy. The policy is effectively silent on these matters. Furthermore, the policy does not reflect the outcomes and agreements set out in the submitted SoCG, notably the statement that "*The Ipswich Strategic Planning Area Board provides a mechanism to discuss the authorities' approach to housing requirements and to inform and guide the approach to be taken within each Local Plan*". It is clear that the Submission Draft Plan was largely prepared in advance of these considerations, at least in as far as addressing the cross-boundary implications of meeting housing need in both Ipswich and Suffolk Coastal Districts are concerned, with the small allocation set out at Policy SCLP12.24 being added at a late stage in the Plan's preparation and without fuller consideration of other potential development opportunities in the North East Ipswich area, which include our client's site.

3.0 Point 2.18 - Is the identification of settlements set out in the Settlement Hierarchy in Policy SCLP3.2 justified?

3.1 Rushmere St. Andrew (excluding the village) is defined within Policy SCLP3.2 as constituting part of the "East of Ipswich Major Centre" within the policy's settlement hierarchy. The policy notes that "*The Settlement Hierarchy enables the Council to achieve its vision for the District, meeting the scale of development required and enhancing the quality of the built, natural, historic, social and cultural environments whilst sustaining the vitality of communities*", and also that "*The development requirements for Major Centres, Market Towns, Large Villages and Small Villages will be delivered through site allocations in the Local Plan or in Neighbourhood Plans, plus through windfall development in accordance with other policies in this Local Plan*".

3.2 The summary of the various policy approaches to the Settlement Hierarchy set out in Table 3.4 indicates that the only projected housing growth for the "East of Ipswich Major Centre" will be through development at Brightwell Lakes, at the Suffolk Police HQ site at Martlesham Heath and by development within settlement boundaries. It

is noteworthy that the proposed allocation in Policy SCLP12.24 is not listed within Table 3.4, inferring that it is in fact not being considered as part of the planned approach for housing development in the East of Ipswich Major Centre, as also discussed at paragraph 2.6 above. This is indicative of the Plan's disjointed approach towards addressing the strategic planning opportunities in that Major Centre.

- 3.3 As set out in our Hearing Statement for Matter 2A, we consider that the Suffolk Coastal Local Plan does not yet address strategic cross-boundary issues with Ipswich Borough with sufficient clarity, particularly as they will affect the later years of the Plan period. The emerging Ipswich Local Plan identifies a long-term strategic direction of growth to the north-east of the existing Ipswich urban area, which is not reflected in the Suffolk Coastal Local Plan. Such a planned direction of growth by Ipswich Borough Council is adjacent to the Plan's "East of Ipswich Major Centre" and potentially a part of that Major Centre, at least for the period post-2031.
- 3.4 The Plan's only statement, at paragraph 3.34, that "*In future Local Plan revisions, the Council will reconsider growth opportunities in the parts of the District neighbouring Ipswich, taking into account delivery rates at Brightwell Lakes and opportunity to bring forward development that supports the Business Case for strategic road routes to the north of Ipswich (as promoted by Suffolk County Council)*" is an inadequate and uncertain policy position, bearing in mind that the Plan is presently seeking to address growth requirements up to 2036, and that the Ipswich Northern Route could be delivered from 2027 onwards.

4.0 Conclusion and Proposed Change to Submission Local Plan

4.1 This Hearing Statement, specifically addressing Policies SCLP3.1 and SCLP 3.2, should be considered in the context of our client's broader case that the Plan presently fails to address the strategic cross-boundary matters being considered by the Ipswich Strategic Planning Area Board. We do not consider that Policy SCLP3.1 presently addresses such matters with sufficient clarity) and it specifically does not recognise the potential growth requirements of Ipswich Borough post-2031 and any potential requirements for further development in the "East of Ipswich Major Centre", as defined in Policy SCLP3.2 and amplified in Table 3.4.

4.2 We consider that Policy SCLP3.1, and its supporting justification, should be modified to provide a clear policy direction to the statement that is presently confined to paragraph 3.34 in the Plan, and that the "East of Ipswich Major Centre" will be expected to accommodate further growth in the later phases of this Plan period, together with supporting infrastructure such as the planned Ipswich Northern Route.



SUFFOLK COASTAL LOCAL PLAN

EXAMINATION HEARING STATEMENT

FOR HEARING SESSION ON 4 SEPTEMBER 2019

**MATTER 3 – AREA SPECIFIC STRATEGIES – DEVELOPMENT
ALLOCATIONS**

Prepared by Strutt & Parker on behalf of Bloor Homes Eastern

July 2019

Site Name:	Land North of Humber Doucy Lane and South of Lamberts Lane, Rushmere St Andrew, Ipswich
Client Name:	Bloor Homes Eastern
Type of Report:	Hearing Statement – Matter 3
Prepared by:	Derek Stebbing BA(Hons) DiP EP MRTPI
Approved by:	Andrew Butcher Dip TP. MRTPI
Date:	31 st July 2019

Suffolk Coastal Local Plan Examination

Matter 3 – Area Specific Strategies – Development Allocations

1.0 Introduction

- 1.1 Strutt & Parker are instructed by Bloor Homes Eastern to submit this Hearing Statement to the Examination for the Suffolk Coastal Local Plan (2018-2036). Previous submissions on behalf of our clients have been made to the Suffolk Coastal District Council (now part of East Suffolk Council) throughout the emerging Local Plan process.
- 1.2 Bloor Homes Eastern are promoting the residential allocation of the land to the north east of Humber Doucy Lane and Lamberts Lane, Rushmere St Andrew, Ipswich. The land was referenced by the Council as Sites 1087 and 1145 in earlier Local Plan Consultation documents and was assessed in the Initial Sustainability Appraisal. A Location Plan outlining the site and Draft Masterplan accompanied our Hearing Statement for Matter 2A. The site lies to the east of the proposed allocation of land at Humber Doucy Lane in the Plan at Policy SCLP12.24, which is the subject of this Hearing Statement.
- 1.3 The overall site is approximately 115 hectares in size and comprises two potential residential development allocations, the first being the short-term delivery comprising of 13.5 hectares of land north east of Humber Doucy Lane; and the second comprising the remaining land which lies to the north east of Lamberts Lane. This is being promoted by Bloor Homes as a medium-term opportunity for a Garden Village development. These opportunities respond to the identified role of the Local Plan in addressing the strategic objectives for the area.
- 1.4 This Hearing Statement is concerned with Matter 3 of the Examination Hearing programme, and specifically addresses Point 3.27 of the Inspector's questions for Matter 3.

2.0 **Matter 3 – Communities Surrounding Ipswich**

Point 3.27 - What is the justification for the allocation of land at Humber Doucy Lane coming forward beyond 2031? Is Policy SCLP12.24 developable within the plan period?

2.1 Policy SCLP12.24 states as follows:-

Policy SCLP12.24: Land at Humber Doucy Lane

9.9ha of land to the east of Humber Doucy Lane is identified to come forward for the development of approximately 150 dwellings post 2031. Development will come forward as part of a master planned approach with land in Ipswich Borough.

Development will be expected to comply with the following criteria:

- a) Delivery of a high quality design incorporating a mix of housing types, including affordable housing on-site;*
- b) A site-specific Flood Risk Assessment will be required;*
- c) Provision of 0.1ha of land for an early years setting if needed within the part of the site in Suffolk Coastal District;*
- d) Contribution to the creation of a ‘green rim’ around Ipswich and provision of on-site open space;*
- e) Provision of a soft edge to the urban area through the provision of significant landscaping;*
- f) Promotion of the use of sustainable modes of transport; and*
- g) An archaeological assessment will be required.*

Development will be accessed via Humber Doucy Lane. A Transport Assessment will be required to identify any necessary improvements to highways and junctions on Humber Doucy Lane and Tuddenham Road.

2.2 This Hearing Statement further supports our client’s case that the Submission Draft Plan pays insufficient regard to the strategic context of meeting the full housing need up to 2036 across the Ipswich Strategic Planning Area, the potential need for Ipswich Borough Council to consider sites beyond its administrative boundaries as part of strategic cross-boundary distribution of housing growth (as reflected in Agreement C3 of the submitted Statement of Common Ground (v4 March 2019) and the fact that a part of our client’s site falls within the Ipswich Borough Council administrative area. It should be read alongside our Hearing Statements for Matters 2A and 2C.

2.3 Policy SCLP12.24 was introduced into the Plan at a late stage, shortly before its final consultation and Submission for Examination. It has clearly been introduced because the proposals for the Ipswich Garden Suburb straddle the administrative boundary between Ipswich and East Suffolk. Indeed, this confirmed by paragraph 12.215 which states that “*The site is identified to come forward post 2031 to enable the delivery of the Ipswich Garden Suburb to become well established and for*

infrastructure such as the primary school associated with the Ipswich Garden Suburb to be delivered.”

2.4 This approach is piecemeal and disjointed. As noted in our Hearing Statement for Matter 2C the proposed allocation is not identified within Table 3.4 of the Plan as an element of the growth proposals for the “East of Ipswich Major Centre”, nor is it identified at any other point in the Plan as being within that Major Centre. Nevertheless, it is quite clearly part of a strategic development proposal (Ipswich Garden Suburb) to meet part of Ipswich’s growth requirements.

2.5 Our concerns regarding Policies SCLP2.1 and SCLP3.1 are equally applicable to Policy SCLP12.24, in that this policy also fails to demonstrate the Plan’s stated “close functional relationship” with Ipswich Borough.

2.6 It is our submission that, if Policy SCLP12.24 is to be justified, it should be set quite clearly in the context of being one element of the strategic cross-boundary issues (between Ipswich and East Suffolk) arising from the Plan’s strategy for growth over the period 2018-2036; in this case for the period post-2031. It should be further identified as being part of the “East of Ipswich Major Centre”.

2.7 As we have stated in our Hearing Statement for Matter 2A, the Plan should contain clearer policy guidance (within Policy SCLP2.1) on the strategic cross-boundary matters that will clearly affect the area to the north-east of Ipswich. These include the proposed “direction of travel” for the growth of Ipswich post-2031 and the proposed Ipswich Northern Route. It is clear that the Submission Draft Plan was largely prepared in advance of these considerations, and the relatively late addition into the Plan of Policy SCLP12.24 demonstrates that it has been reactive rather than proactive.

2.8 Policy SCLP12.24 is therefore just one small part of a much bigger strategic picture, and we consider that, as a minimum, the Plan should signal that land to the north-west of Rushmere St. Andrew may come forward for development in later years of the Plan period in order to address the wider strategic growth requirements of the Ipswich Strategic Planning Area.

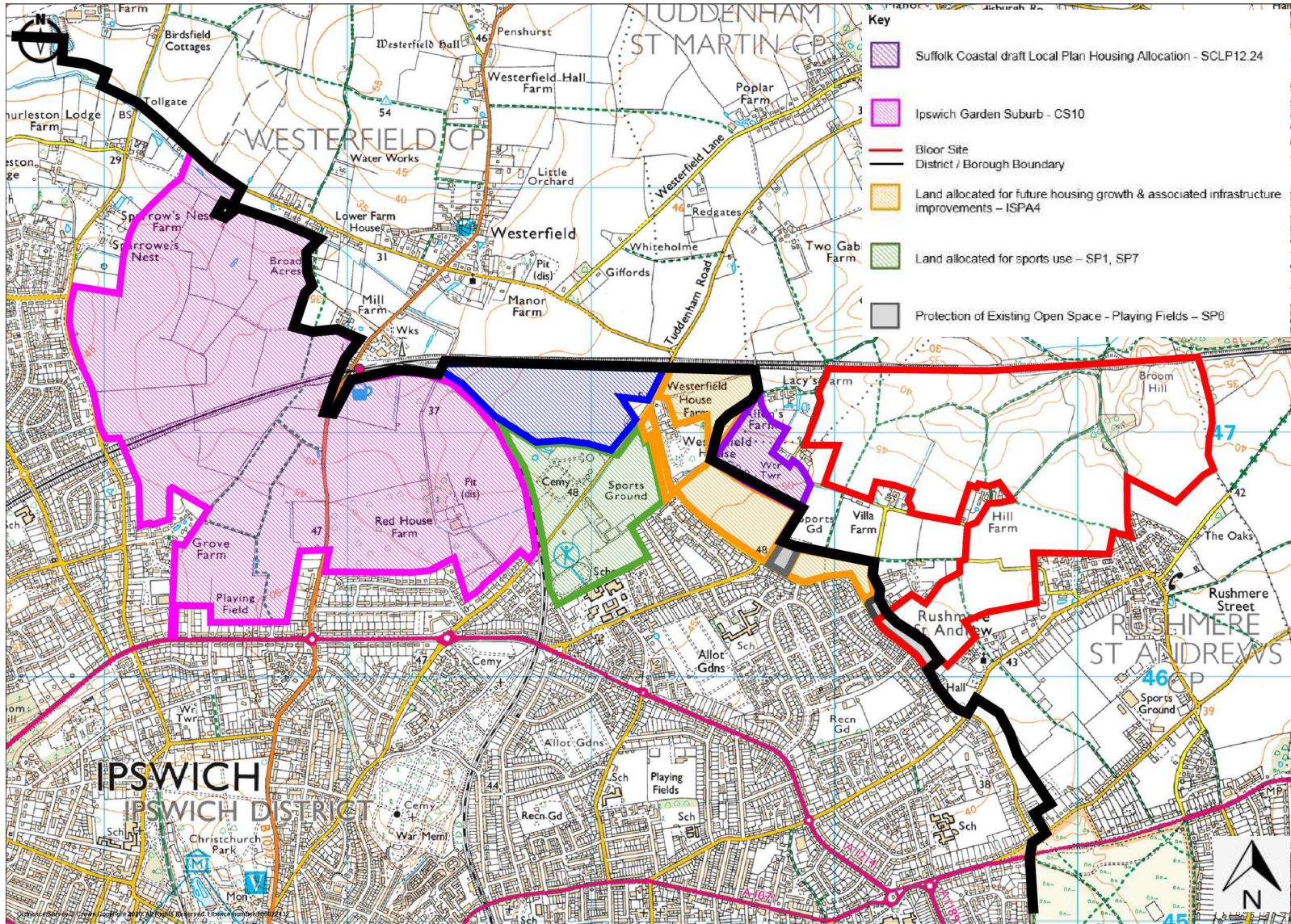
2.9 The Plan's present stated approach (at paragraph 3.34) of intending to reconsider growth opportunities in the parts of the District neighbouring Ipswich in future revisions of the Local Plan is inadequate, if the Plan is expected to provide clear strategic policies for the whole of the Plan period, namely 2018-2036.

3. Conclusion and Proposed Change to Submission Local Plan

3.1 This Hearing Statement, specifically addressing Policy SCLP12.24 should be considered in the context of our client's broader case that the Plan presently fails to address the strategic cross-boundary matters being considered by the Ipswich Strategic Planning Area Board. We do not consider that Policy SCLP12.24 and its supporting justification, as presently drafted, provides sufficient clarity or certainty on those matters, despite the fact that it is quite clearly proposed to be an element of meeting the potential growth requirements of Ipswich Borough post-2031.

3.2 Furthermore, Policy SCLP12.24 and its supporting justification, should be set within the context of contributing to the Plan's proposed distribution of growth to the "East of Ipswich Major Centre" and that further land, to the north-west of Rushmere St Andrew, may come forward for development in later years of the Plan period in order to address the wider strategic growth requirements of the Ipswich Strategic Planning Area, including the proposed Ipswich Northern Route.

Appendix D



Appendix E

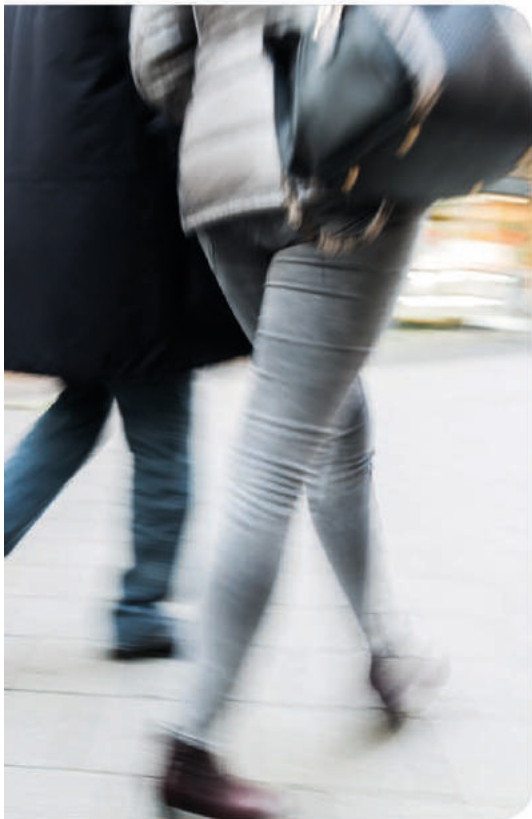


Bloor Homes

Land at Humber Doucy Lane, Rushmere St Andrew

Phase 1 Transport Feasibility Study

March 2020



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Bloor Homes

Land at Humber Doucy Lane, Rushmere St Andrew

Phase 1 Transport Feasibility Study

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CONTENTS

1	INTRODUCTION	1
1.1	Overview	1
1.2	Planning History and Site Allocations	2
2	EXISTING CONDITIONS	4
2.1	Introduction	4
2.2	Local Highway Network	4
2.3	Walking and Cycling Accessibility	6
2.4	Access to Local Amenities	8
2.5	Bus Accessibility	9
2.6	Rail Accessibility	10
2.7	Road Safety Review	11
2.8	Modal Share	12
3	ACCESS STRATEGY AND PARKING STANDARDS	14
3.1	Introduction	14
3.2	Access Strategy	14
3.3	Background Traffic flows	14
3.4	Swept Path Analysis	15
3.5	Cycleways and Pedestrian Routes	15
3.6	Providing for people with disabilities	16
3.7	Parking Standards	16
3.8	Potential Constraints for Phase 1	16
4	TRAFFIC FLOWS, TRIP GENERATION AND DISTRIBUTION	18
4.1	Introduction	18
4.2	Trip Generation	18
4.3	Trip Distribution and Traffic Assignment	19
4.4	Committed Developments	20
4.5	Future Year Traffic Growth	20
4.6	Assessment Scenarios	20
4.7	Junction Capacity Assessment	20
4.8	Wider Highway Network Impact	21
5	TRAVEL PLANNING	22
5.1	Introduction	22
5.2	Travel Plan	22
5.3	Pedestrian and Cycle Improvements	22
5.4	Car Clubs	22

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5.5	Electric Vehicle (EV) Charging Points	23
6	SUMMARY AND CONCLUSION	24
6.1	Summary	24
6.2	Conclusion	25
APPENDICES		
APPENDIX A - SITE ACCESS MODELLING RESULTS		

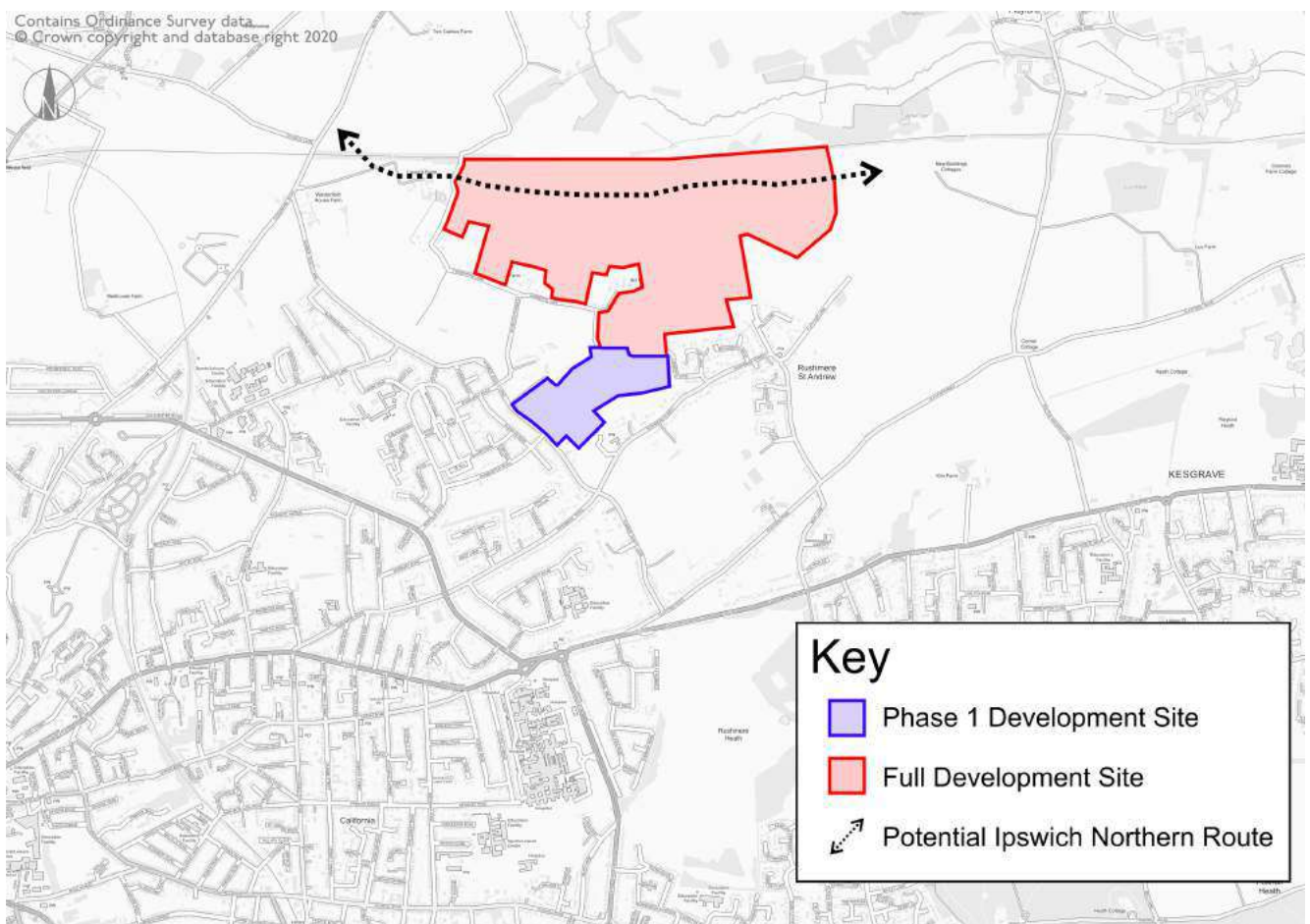
1 Introduction

1.1 Overview

1.1.1 mode transport planning (mode) have been commissioned by Bloor Homes to provide highways and transport advice for a residential development at land to the northeast of Humber Doucy Lane, approximately 3km from Ipswich Town Centre. The initial land parcel of the development is envisaged to provide circa 200 dwellings, which could act as a possible gateway for a further 1,200 dwellings and a future link to the potential Ipswich Northern Route (Inner Route). Whilst we understand that Suffolk County Council are not proceeding with the next stage of the business case into the Northern Relief Road, as confirmed at the Cabinet meeting on 25th February 2020, should this change in the future, the proposed Site can assist in the delivery of the Road. With Bloor Homes controlling a large part of the land to the north of Humber Doucy Lane, it is uniquely placed to be able to assist in the delivery of a relief road if required in the future. For the purposes of this report, the initial parcel of land is referred to as Phase 1.

1.1.2 **Figure 1.1** identifies the location of both Phase 1 and the wider site, as well as the indicative alignment of the Ipswich Northern Route (Inner Route).

Figure 1.1: Site Location

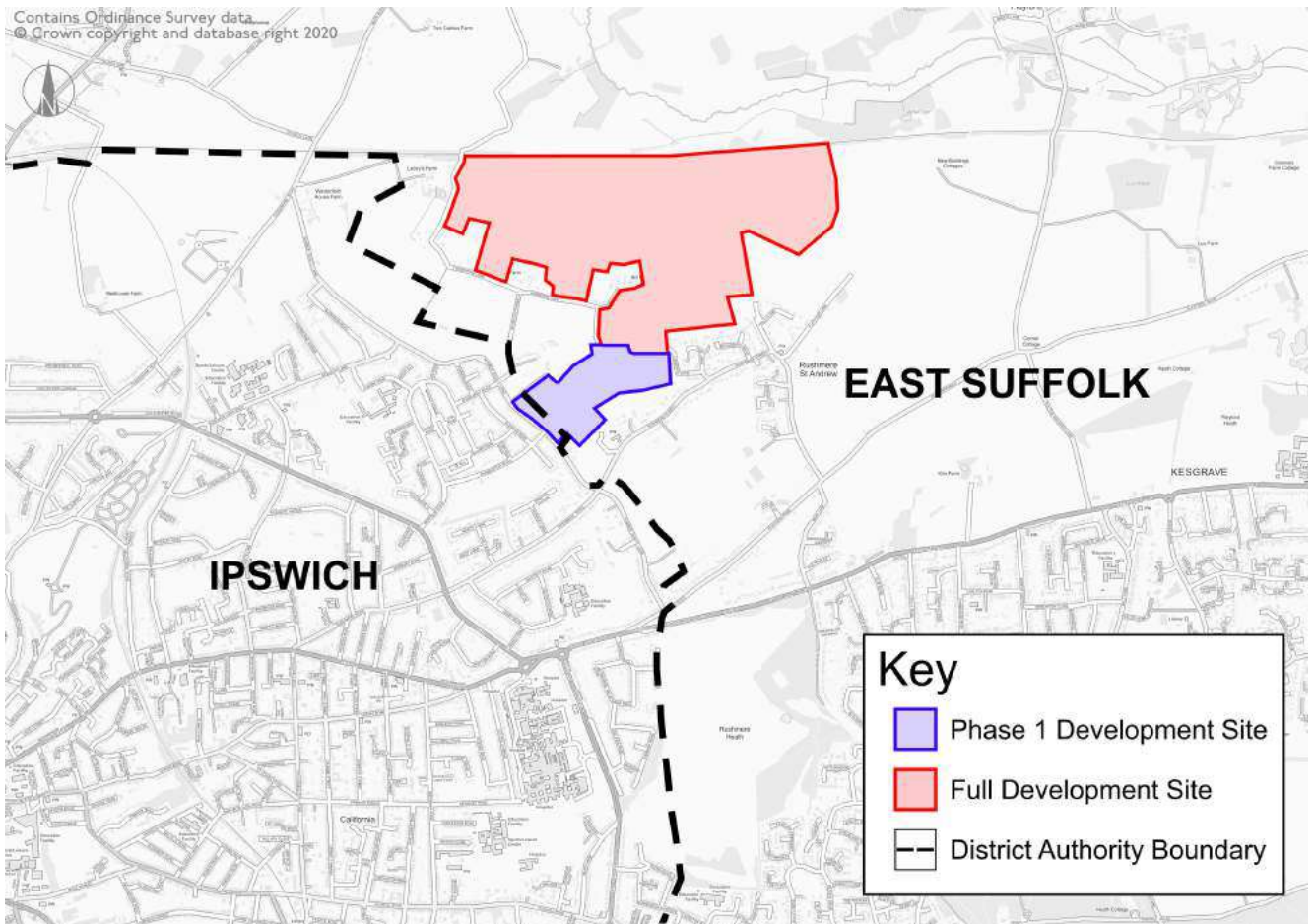


- 1.1.3 Phase 1 of the site is located on land immediately to the northeast of Humber Doucy Lane, extending from Rushmere Village Hall in the south to Tuddenham Lane in the north. The wider site encompasses a number of agricultural land parcels with areas of woodland and hedges bordering some of the fields. It is anticipated that initially this will be accessed via the Phase 1 development.
- 1.1.4 The consultation of the Ipswich Northern Route involves three key route options (outer, middle and inner) which offer links between the A14 and A12 in order to alleviate traffic routing through Ipswich and the Orwell Crossing to the south of the town.
- 1.1.5 The inner route option for the Ipswich Northern Route has the potential to route through the wider development area offering connection between the site to the A14 and the A12 to the west and east respectively.
- 1.1.6 Access to the Phase 1 site is currently proposed off Humber Doucy Lane via an existing agricultural access located approximately 40m north of Dumbarton Road, which will be widened and formalised as part of any future planning application.
- 1.1.7 In addition to the residential elements of the development, it is anticipated that Phase 1 could include a community orchard, a neighbourhood green, structural planting, meadow parkland and an area for active sports.
- 1.1.8 This Transport Feasibility Study considers the transport opportunities provided by the Phase 1 scheme, including access by sustainable modes. It also determines the level of traffic anticipated to be generated during the typical AM and PM peak hours and considers the forecast baseline traffic flows until 2036, being the end of the Plan period of both the emerging Suffolk Coastal Local Plan and Ipswich Local Plan. This study also considers appropriate design of the site access to serve Phase 1.
- 1.1.9 In addition to the general context of the site, this report will explore how the site's location could provide an excellent opportunity to link to the inner option of the Ipswich Northern Route was promoted.

1.2 Planning History and Site Allocations

- 1.2.1 The site is located within Suffolk County and Suffolk County Council (SCC) act as highway authority for the area; however, Phase 1 of the development is located in both East Suffolk Council (formerly Suffolk Coastal District Council) and Ipswich Borough Council, both of whom will require consultation as part of the proposals. The location of the site relative to the district boundaries are shown on **Figure 1.2** below.

Figure 1.2: East Suffolk Council and Ipswich Borough Council boundaries



2 Existing Conditions

2.1 Introduction

2.1.1 This chapter sets out the context of the Phase 1 site in terms of the local highway network and explores the current situation of the site in terms of sustainable transport.

2.2 Local Highway Network

2.2.1 The first phase of development is to be located on land to the northeast of Humber Doucy Lane, extending from Rushmere Village Hall to Tuddenham Lane. The village of Rushmere St Andrew is approximately 650m to the east of the site, and Ipswich Town Centre is approximately 3km to the southwest.

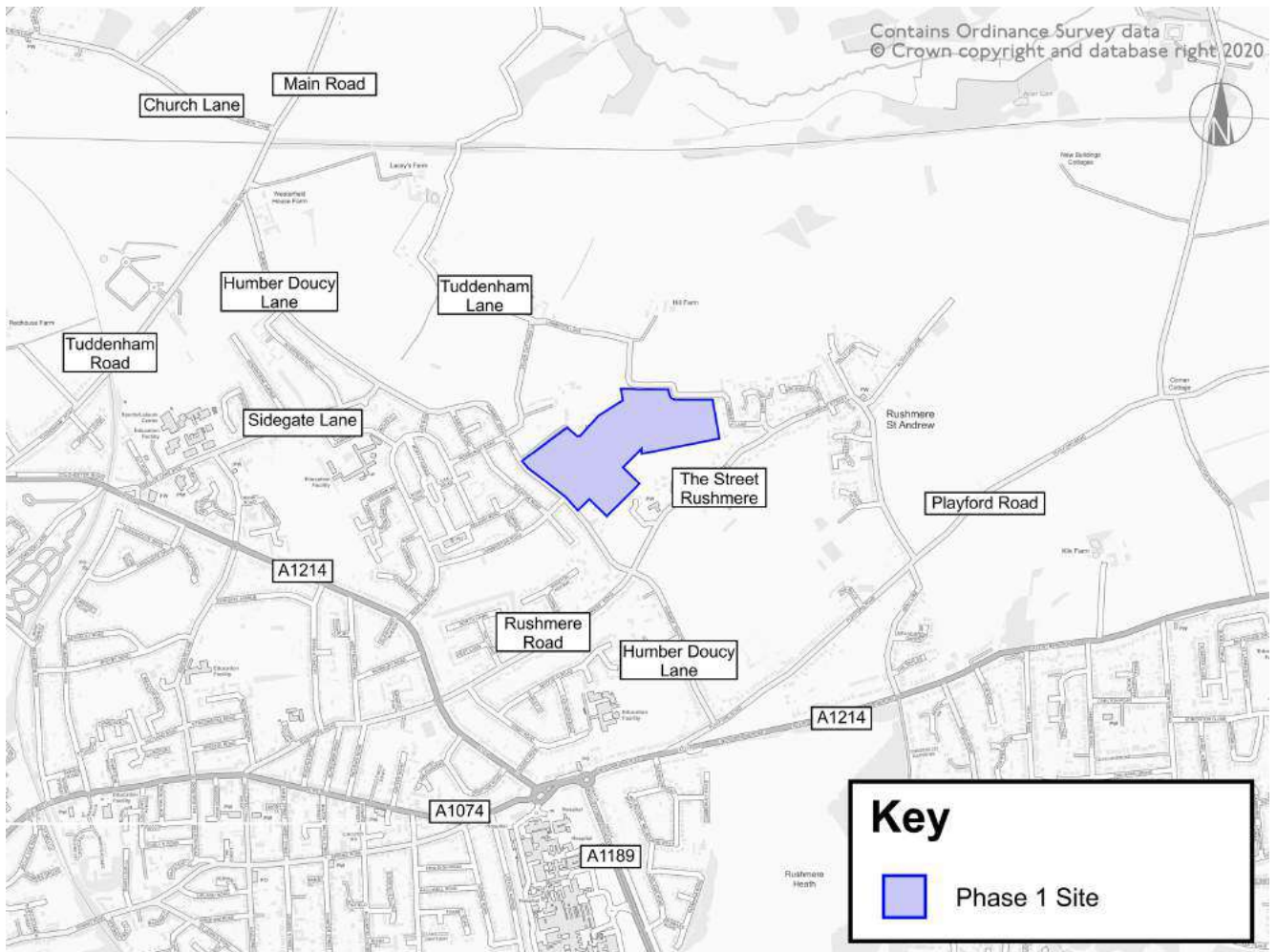
2.2.2 Access to the Phase 1 site is currently provided off Humber Doucy Lane via an agricultural access located approximately 40m north of Dumbarton Road. This will be widened and formalised as part of any future planning application in order to appropriately serve the site. The access is currently an opening in the hedge line and is shown in **Figure 2.1** below.

Figure 2.1: Existing Site Access off Humber Doucy Lane



2.2.3 Humber Doucy Lane joins The Street Rushmere and Rushmere Road to the south via a mini roundabout, providing a connection to the village of Rushmere St Andrews to the east, and Ipswich Town Centre to the southwest respectively. At its northern extent, Humber Doucy Lane connects with Tuddenham Lane, which provides an alternative route to Ipswich Town Centre and a connection to the village of Westerfield and the A14. The local highway network in relation to the Phase 1 site is illustrated in **Figure 2.2**.

Figure 2.2: Local Highway Network



Humber Doucy Lane

2.2.4 Humber Doucy Lane lies on a north-west to south-east axis and is subject to a 30mph speed limit. It has a 6m carriageway width outside the site access and benefits from 2m footway on its southern side. The road does not benefit from a centreline in the vicinity at the site frontage, and there are no parking restrictions along its extent, on site observations revealed that vehicles park on both sides of the carriageway.

2.2.5 To the south of the site, Humber Doucy Lane joins The Street Rushmere and Rushmere Road via a mini roundabout, where traffic can head south-west on Rushmere Road towards Ipswich Town Centre or north-east on The Street Rushmere towards the village of Rushmere St Andrew.

The Street Rushmere

2.2.6 The Street Rushmere lies on a north-east to south-west axis and is a single carriageway road with a 4.5m carriageway width. It is subject to a 30mph speed limit and benefits from double yellow line restrictions to restrict parking along the carriageway. There is also a segregated footway along the northern side of the carriageway, which provides direct access to the Public Right of Way (PRoW) network that dissects the site. The Street Rushmere also provides pedestrian access to the village of Rushmere St Andrew via a continuous footway along the northern side of the carriageway.

Rushmere Road

2.2.7 Rushmere Road lies on an east to west axis and is a single carriageway road with a 6m carriageway width. It is subject to a 30mph speed limit and benefits from double yellow line restrictions to restrict parking on the carriageway. Rushmere Road runs through the centre of a residential estate, with 2m footways on both sides of the carriageway. It continues west and provides a route towards Ipswich Town Centre via the A1156 Woodbridge Road.

Tuddenham Road

2.2.8 Humber Doucy Lane extends north-westerly to Tuddenham Road via a priority junction, which enables connection to the village of Tuddenham to the north and the A1214 Colchester Road to the south, which continues towards Ipswich Town Centre. Tuddenham Road is subject to a 30mph speed limit within the vicinity of the junction with Humber Doucy Lane, and has a 6m carriageway width.

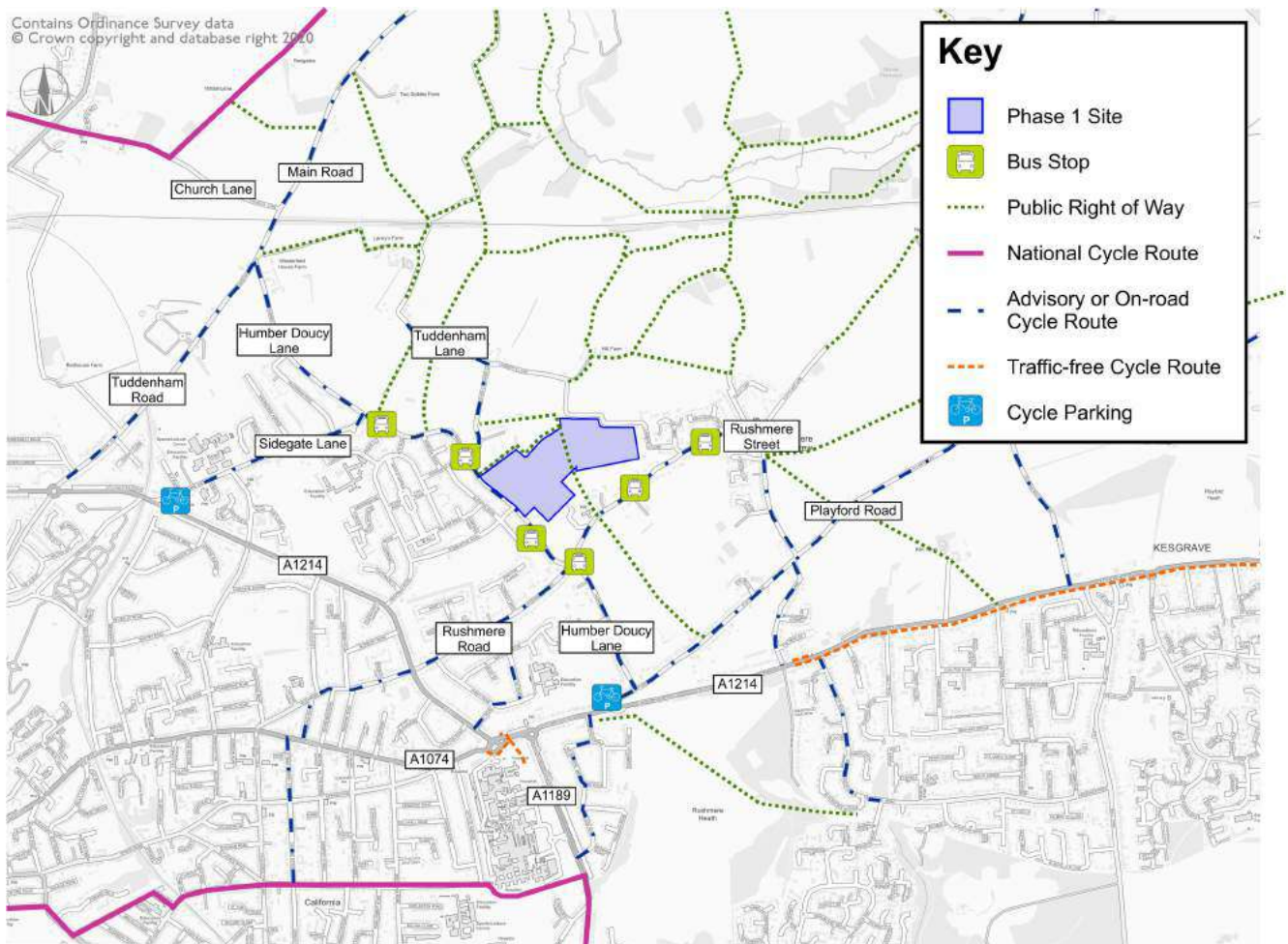
Sidegate Lane

2.2.9 Sidegate Lane is single carriageway road accessed off Humber Doucy Lane opposite Ipswich Rugby Club, and provides a secondary route through a residential estate to join the A1214 Colchester Road, which continues towards Ipswich Town Centre. It is subject to 30mph speed limit and has a 6m carriageway width, and benefits from street lighting.

2.3 Walking and Cycling Accessibility

2.3.1 A desktop study has been undertaken to understand the existing facilities for pedestrians and cyclists within the vicinity of the proposed site and shown below on **Figure 2.3**.

Figure 2.3: Public Rights of Way (PRoW) and Cycling Routes



2.3.2 The nearby area benefits from numerous footways which follow the route of the local highway network and throughout the neighbouring residential estate. It is envisaged that these existing routes will be utilised and promoted for leisure usage. Suffolk County Council also provides an online map of all of the Public Rights of Way (PRoW), which identifies that a PRoW runs directly through the centre of the proposed site another that lies on the western boundary of the site.

2.3.3 In terms of cycling accessibility, Ipswich Borough Council provides an online cycle map illustrating the on-road and off-road cycle routes within and around the town (together with cycle parking facilities) and these routes are identified in **Figure 2.3**.

2.3.4 The online map indicates the following cycle facilities within the vicinity of the proposed site:

- The full extent of Humber Doucy Lane is an advisory cycle route;
- The full extent of Rushmere Street is an advisory cycle route;
- Seven Cottages Lane, to the north of the site is an advisory cycle route. This lane turns into Tuddenham Lane which is also an advisory cycle route, before becoming a public bridleway;
- Melborne Road and Adelaide Road, to the south of Humber Doucy Lane, forms an on-road signed cycle route (National Cycle Route number 4);
- There is cycle parking where Humber Doucy Lane meets Woodbridge Road East (via Playford Road) and where Sidegate Lane meets the A1214;

- There are small sections of traffic-free cycle routes to the south of Humber Doucy Lane (at the A1214/A1189 roundabout) and on the A1214 Woodbridge Road to the south of Rushmere St Andrew; and
- The westbound side of the A1214 Woodbridge Road, to the east of Rushmere Golf Course is a traffic free cycle route.

2.4 Access to Local Amenities

2.4.1 Guideline walking distances provided in the Chartered Institution of Highways and Transportation (CIHT) document ‘Guidelines for Providing for Journeys on Foot (2000)’, are shown in **Table 2.1**.

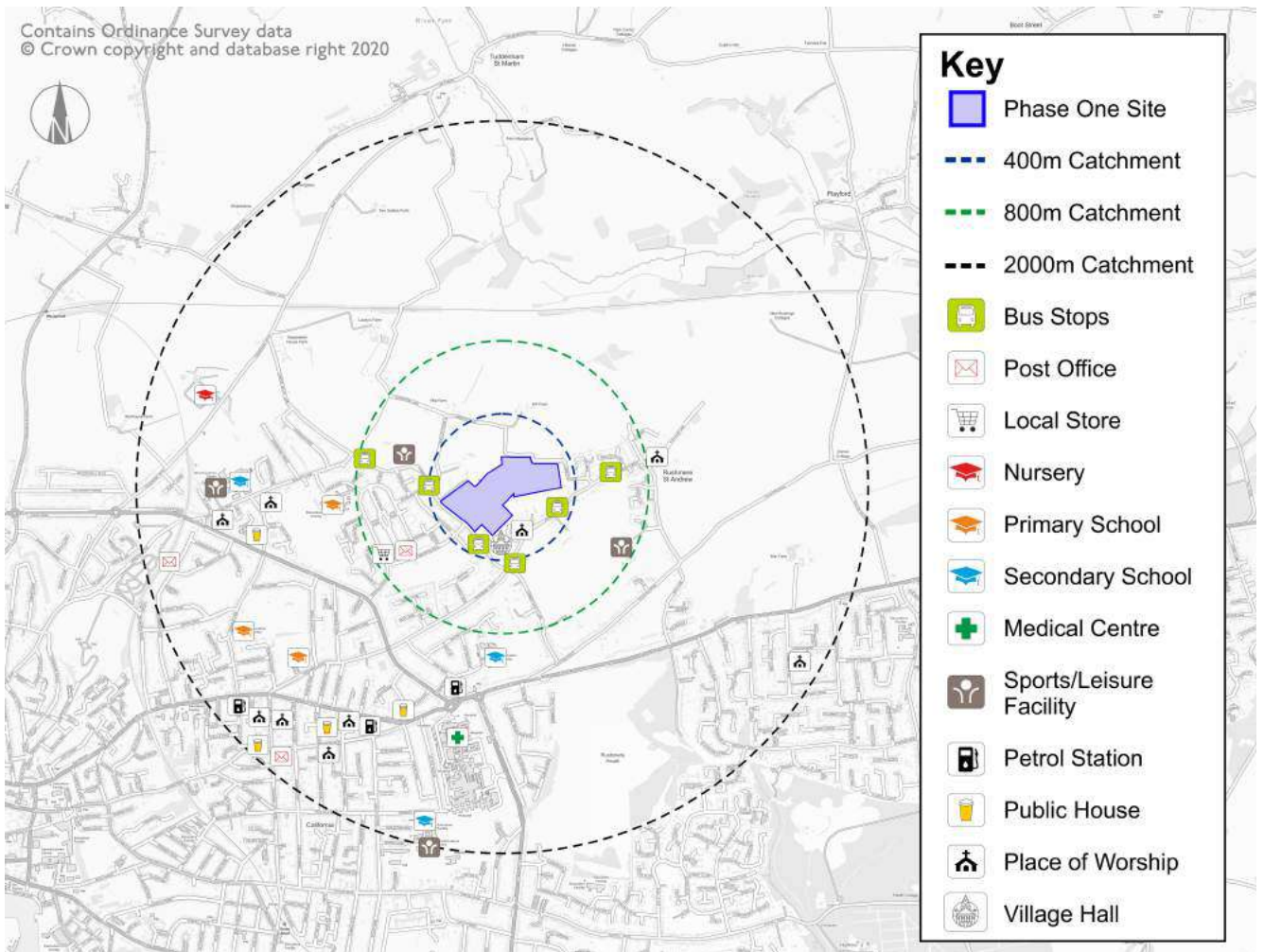
Table 2.1: CIHT Guideline Acceptable Walking Distances

Criteria	Town Centre	Commuting / Sight Seeing
Desirable	200m	500m
Acceptable	400m	1,000m
Preferred Maximum	800m	2,000m

2.4.2 The CIHT guidelines shown in **Table 2.1** suggest that, for commuting purposes, up to 500m is a desirable walking distance, up to 1km is considered an acceptable walking distance and 2km is the preferred maximum walking distance.

2.4.3 Considering the walking distance guidelines above, a desk-top study has been undertaken to understand the number and type of local amenities in the local area and to identify those that will be accessible on foot. **Figure 2.4** below outlines the findings.

Figure 2.4: Amenities Location Plan



2.4.4 As can be seen in the figure above, there are a number of bus stops within 400m of the proposed residential site (with the nearest bus stop within 100m). Rushmere Village Hall, a place of worship and a community centre are also within a 400m catchment.

2.4.5 Within 800m, further bus stops are accessible, as is another place of worship. There are also two sports and leisure facilities, a local convenience store and a post office within the 800m catchment area.

2.4.6 Further afield within 2000m, there are numerous education facilities, places of worship, public houses, petrol stations, post offices, leisure facilities and a medical centre; all of which are accessible for the residents of the proposed development.

2.5 Bus Accessibility

2.5.1 The nearest bus stop to the proposed site is called the Community Hub, located at Rushmere Village Hall on Humber Doucy Lane. This is less than 100m from the Phase 1 site and can be reached on foot within 2 minutes. The 59 bus serves this stop and provides a connection towards Ipswich Town Centre and Rushmere during the week and on Saturday; there is currently no Sunday service.

2.5.2 The 59 service also serves the Roxburgh Road stop on Humber Doucy Lane, to the north of the site access.

2.5.3 Slightly further afield, there is a second bus stop at Rushmere Road which can be reached on foot within 6 minutes. This stop is served by the 59 service and the 71 and 72 services. The 71 service runs a weekday and Saturday route between Sudbourne and Ipswich, via Orford, Hollesley and Woodbridge. In addition, the 72 service operates during the week, connecting Woodbridge and Ipswich via Martlesham and Playford.

2.5.4 A summary of the bus timetables described above are shown in **Table 2.2** below for reference.

Table 2.2: Local Bus Services

Service No	Route	Approx. Frequency – 2 way (buses/hour)		
		Weekday	Sat	Sun
59	Ipswich – Chelworth Avenue - Rushmere	Hourly	Hourly	-
71	Sudbourne – Orford – Hollesley – Woodbridge - Ipswich	08:08	08:08	-
72	Woodbridge – Martlesham – Playford - Ipswich	09:48 and 13:03	-	-

2.5.5 These existing services and stops provide future residents with an opportunity to travel sustainably using public transport, which is accessible on foot.

2.6 Rail Accessibility

2.6.1 There are two railway stations within proximity of the proposed site; with the closest being Derby Road Railway Station located 3km south of from the site. This railway station is located on the Felixstowe branch line which serves the Rose Hill area and southern area of California, Ipswich. There is an hourly service in each direction between Felixstowe and Ipswich. The railway station is managed by Greater Anglia trains.

2.6.2 Derby Road Railway Station is accessible from the site via a 10 minute cycle ride or a 6 minute car journey. This railway station is currently not easily accessible from the site via bus.

2.6.3 Westerfield Railway Station is also located close the site; approximately 3.5km northwest of the site. Westerfield station is on a branch line off the Great Eastern Main Line and is currently managed by Greater Anglia, who operate all trains serving the station. There is an hourly shuttle service to Ipswich via the Felixstowe line and there is a limited peak hour only service between Lowestoft and Ipswich.

2.6.4 Westerfield Railway Station is accessible via car in approximately 6 minutes. Westerfield railway station can also be accessed via public transport; the fastest route is served by the number 59 bus which runs from the Community Hub at Rushmere Village Hall. This journey would take approximately 19 minutes.

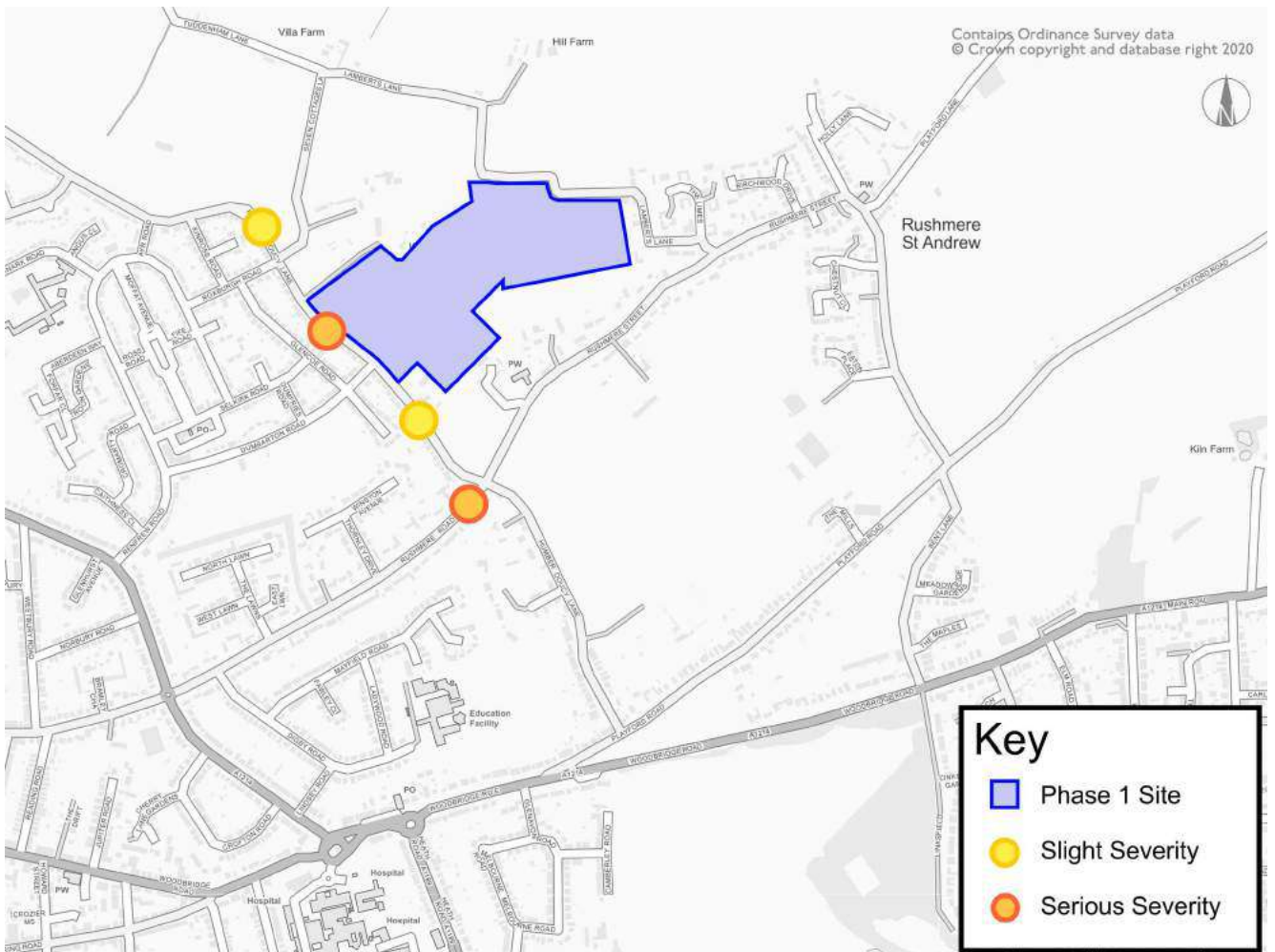
2.6.5 Individuals could also cycle to Westerfield Railway Station, where cycle parking is available, which would take approximately 11 minutes.

2.7 Road Safety Review

2.7.1 Personal Injury Collision (PIC) data has been obtained from Crashmap (crashmap.co.uk) for the most recently available six-year period (January 2013 and September 2018). The study area includes Humber Doucy Lane and the Humber Doucy Lane / Rushmere Road / The Street Rushmere roundabout.

2.7.2 The following figures show the extent of the local highway network being studied, location and severity of the PIC's reported during the study period.

Figure 2.5: PIC Location Plan



2.7.3 As shown in **Figure 2.5**, there were two collisions of serious severity and two collisions of slight severity within the specified search area during the study period. There were no fatal collisions reported within the search area during the 6 year period.

2.7.4 Based on the narrative, the collisions of serious severity occurred as a vehicle collided with a goods vehicle along Humber Doucy, with a child being injured; and a vehicle collided with a cyclist at the Humber Doucy Lane / Rushmere Road / The Street Rushmere roundabout.

2.7.5 The collisions of slight severity were due to a motorcyclist crashing after passing a stationary vehicle; and a vehicle with an inexperienced driver crashing along Humber Doucy Lane (no other vehicles were involved in the collision).

2.7.6 Based on the low number of collisions and their spread throughout the study area over the latest six-year period, it is concluded that there is no evidence to suggest that the proposed development will have a detrimental impact on highway safety.

2.8 Modal Share

2.8.1 The current modal split has been obtained from the 2011 Census data for “Method of Travel to Work” for the Rushmere St Andrew ward (E050007218), where the development is located. This travel data has been summarised below in **Table 2.3**.

Table 2.3: Modal Share – Rushmere St Andrew Ward

Method of Travel to Work	Modal Split
Underground, metro, light rail, tram	0%
Train	3%
Bus, minibus or coach	4%
Taxi	0%
Motorcycle, scooter or moped	1%
Driving a car or van	76%
Passenger in a car or a van	5%
Bicycle	5%
On foot	5%
Other method of travel to work	1%
Total	100%

2.8.2 The table above indicates that 81% of people in the Rushmere St Andrew ward currently travel to work by car, of which 76% are single occupancy car trips. Sustainable trips comprise of 5% walking to work, 3% using the train, 5% cycle to work and 4% use the bus. This indicates that by improving walking, cycling and public transport facilities to connect the site to the local area could provide an excellent opportunity to shift travel behaviours towards more sustainable modes of travel and reduce reliance on the car, particularly single occupancy car trips.

2.8.3 Consequently, the promotion of this site will assist in encouraging new and existing residents within the area to travel by sustainable modes of transport. This will be supported by preparing a Travel Plan to set out realistic measures to reduce the number of single-occupancy vehicle trips generated as a result of the development. It will also propose methods for implementing and monitoring the Travel Plan to achieve this modal shift. The Travel Plan can then be implemented for the wider site to help promote

sustainable transport for a greater audience. Some of the key measures that could be implemented are explored further in **Chapter 5**.

3 Access Strategy and Parking Standards

3.1 Introduction

3.1.1 The following section takes into consideration the existing transportation infrastructure outlined in previous chapters and explores the deliverability of the Phase 1 development at Humber Doucy Lane.

3.2 Access Strategy

3.2.1 Currently, it is proposed to deliver up to 200 dwellings as part of the first phase of the development with site access proposed via Humber Doucy Lane. The Phase 1 site already benefits from agricultural access onto Humber Doucy Lane. This will need to be widened and formalised as part of any development proposals.

3.2.2 To understand SCC access requirements to serve the development, the design guidance set out within Suffolk County Council has been reviewed. This outlines the size and scale of access roads for developments based on the proposed number of dwellings.

3.2.3 The SCC Design Guide states that Major Access Roads would be suitable for residential developments and roads serving more than 150 and up to 300 dwellings, and the following criteria should be met:

- “Two points of access should be provided to the part of the site being served and the road layout should conveniently connect those points of access”;
- “Where only one point of access is available, the road layout should form a circuit and there should be the shortest practical connection between this circuit and the point of access. This should always form the stem of a T-junction”; and
- “The minimum spacing between junctions should be 50m”.

3.2.4 The site proposes to provide a T-junction onto Humber Doucy Lane. A loop road within the site approximately 50m north of Humber Doucy Lane will provide a circuit within the internal road network.

3.2.5 In addition, a secondary emergency access point will be provided via the PRow on the western boundary of the site.

3.2.6 The proposed site access will be positioned slightly north of the existing access point in order to ensure 50m junction separation with the Humber Doucy Lane / Dumbarton junction.

3.3 Background Traffic flows

3.3.1 To determine the current traffic volumes on Humber Doucy Lane and to inform the site access design, baseline traffic flows and vehicle speeds have been determined via an Automated Traffic Count survey (ATC), undertaken over a consecutive 7-day period (12/07/19 –18/07/19) in the vicinity of the proposed site access. Currently the speed limit on Humber Doucy Lane is 30mph.

3.3.2 The ATC survey results have been analysed to calculate 85th percentile speeds and subsequently used to derive appropriate visibility splays, in line with the Manual for Streets (MfS) guidance. The 85th percentile speeds identified within the survey are included in **Table 3.1** below for reference.

Table 3.1: 85th percentile speeds and MfS Visibility Requirements

Direction	85 th percentile speed	MfS Visibility Requirements
Northbound	30.4mph	43.8m
Southbound	34.7mph	53.4m

3.3.3 The proposed access junction arrangement has been shown on **Drawing J32-4587-PS-001**, which demonstrates that the required horizontal visibility splays can be achieved. This has been designed in line with guidance set out about from the Suffolk Design Guide for Residential Areas and from the Manual for Streets (MfS) and can be delivered in line with this guidance.

3.4 Swept Path Analysis

3.4.1 In addition to the above, swept path analysis has been undertaken to ensure that a refuse vehicle would be able to access and egress the proposed Phase 1 development in a forward gear. A Traffic Regulation Order (TRO) in the form of yellow lines has been included within the access design to protect the access from potential on-street parking. The swept path analysis assessment is shown on **Drawing J32-4587-PS-002**.

3.5 Cycleways and Pedestrian Routes

3.5.1 The SCC design guide comments that for larger residential housing schemes, joint pedestrian and cycle routes should link housing areas with community facilities, schools, shopping and places of employment. Further, the footpath layout should meet the needs of elderly people. These routes need to be carefully positioned and designed in order that their use will be maximised.

3.5.2 When the provision of a footpath or footway is required it will be necessary to ensure that it is sufficiently wide and well aligned to:

- Avoid the need for pedestrians when passing each other to step out into bus carriageways or to cause damage to planted areas;
- Allow for ramped crossing to garage drives or parking spaces;
- Allow, when necessary, for occasional access along footpath by emergency vehicles; and
- Provide for statutory and another services underground.

3.5.3 Major routes will link to housing areas with schools, shopping centre and employment areas. The absolute minimum width should be:

- Cycleway – 2 metres;
- Footway – 1.8 metres.

3.5.4 The internal road network for the Phase 1 development will be designed to provide 2m footways on both sides of the carriageway throughout the site, as well as providing links to the existing PRow network shown within **Figure 2.4** and existing footways along Humber Doucy Lane.

3.6 Providing for people with disabilities

- 3.6.1 Access to any development should be available to all sections of the community. With this in mind, the following provisions should be considered:
- Suitable access routes for wheelchairs and the marking out of parking spaces close to pedestrian entrances;
 - At all road junctions for pedestrians to cross the minor road with a minimum of inconvenience. Kerbs should, therefore, be dropped flush with the carriageway and tactile paving provided at all junctions;
 - Firm, non-slip surfaces and options that avoid steps; and
 - Particular attention should be paid to the locations at which pedestrian routes cross the carriageway so that footway and footpath users are not exposed to unexpected dangers.
- 3.6.2 The highway network within the site will be designed in line with the above to ensure accessibility for all users.

3.7 Parking Standards

3.7.1 SCC outline the parking standards that should be followed within the curtilage of new developments within the SCC Suffolk Guidance for Parking, Technical Guidance (Third Edition) May 2019. The relevant standards are detailed within **Table 3.2** below.

Table 3.2: SCC Parking Standards

Land Use	Car Parking (minimum)	Cycle Parking (minimum)
1 Bedroom House or Flat	1 space per dwelling	2 secure covered spaces per dwelling. (Satisfied if garage or secure area is provided within curtilage of dwelling to minimum dimensions)
2 Bedroom House or Flat	2 spaces per dwelling*	
3 Bedroom House or Flat	2 spaces per dwelling	
4 Bedroom House or Flat	3 spaces per dwelling	

*reduction in this figure may be considered with a robust and degreed highway mitigation

3.7.2 The parking guidance also contains information regarding the size and quantum of cycle parking that should be included for new residential developments. Thus, any planning application for Phase 1 and/or the wider site should to adhere to this guidance.

3.8 Potential Constraints for Phase 1

- 3.8.1 As previously noted, there are various parcels of land along Humber Doucy Lane identified within both the Suffolk Coastal and Ipswich Local Plan SHELAA which refer to potential constraints of the area within the vicinity of Humber Doucy Lane.
- 3.8.2 In terms of highways, one of the key constraints is the increase in the development in the area impacting the local highway network. In addition, due to the proximity and connectivity of the site to Ipswich, and in order to seek to mitigate any impacts on the surrounding network, it is expected that a robust package

of measures to promote sustainable transport would form part of any proposals, such as a Travel Plan and a strategy to connect the site to the existing PRow network. This has been explored further in **Chapter 5** of this report.

4 Traffic Flows, Trip Generation and Distribution

4.1 Introduction

4.1.1 In order to confirm that the site access design discussed within **Chapter 3** will be suitable for the Phase 1 proposal the traffic conditions on the local highway network currently and in the future; the following have been considered:

- Future year traffic growth;
- Development traffic flows and distribution;
- Assessment area and scenarios; and
- Junction capacity assessments.

4.2 Trip Generation

4.2.1 An assessment has been undertaken to calculate the potential trip generation of the proposed site using the TRICS database (Version 7.6.1). Multi-modal trip rates were obtained using the TRICS database for total persons and vehicle trips. TRICS category '03 –Residential' subcategory 'A – Houses Privately Owned' has been selected for sites ranging between 60 – 300 dwellings that are located within England, excluding Greater London. This search query has returned 20 sites within the TRICS database.

4.2.2 The network peak hour people and vehicle trip rates included in **Table 4.1** below. These trip rates have been applied to the development quantum to forecast the trip generation at the site (200 dwellings).

Table 4.1: Trip Rates and Trip Generation

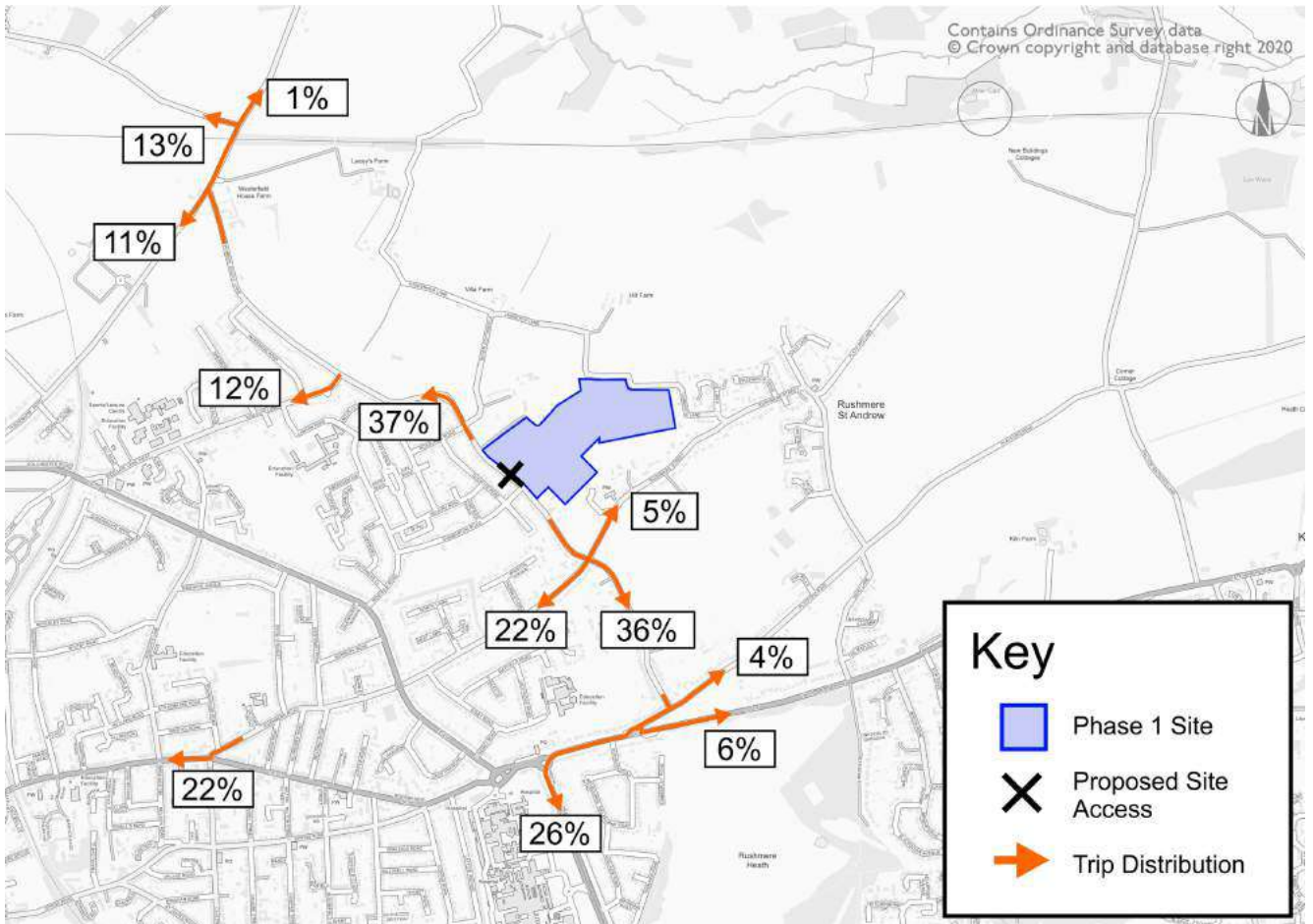
	Weekday AM Peak (08:00-09:00)			Weekday PM Peak (17:00-18:00)		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Total People Trip Rate	0.176	0.651	0.827	0.526	0.234	0.76
Total People Trips	35	130	165	105	47	152
Vehicle Trip Rates	0.111	0.332	0.443	0.299	0.144	0.443
Vehicle Trips	22	66	88	60	29	89

4.2.3 **Table 4.1** shows that the site could generate 165 people movements in the morning peak hour, and 155 people movements in the evening peak hour. Of these 88 and 89 two-way vehicle trips could be generated in the AM and PM peaks respectively.

4.3 Trip Distribution and Traffic Assignment

4.3.1 The forecast vehicular trip generation shown in **Table 4.1** has been distributed and assigned on the local network based on using the Office for National Statistics “Method of Travel to Work” data. **Figure 4.1** below summarises the likely percentage traffic impact from Phase 1 on the local highway network in the network peak hours.

Figure 4.1: Traffic Distribution



4.3.2 **Figure 4.1** shows that from the proposed site access on Humber Doucy Lane, 37% of trips will head northbound. These trips will route to Sidegate Lane (12%), Westerfield (13%), Tuddingham (1%) and Ipswich (11%). The remaining trips (63%) will head in a southerly direction towards the Humber Doucy Lane / Rushmere Road / The Street Rushmere Junction.

4.3.3 Here 22% of trips that head west towards the A1214 and Ipswich Town Centre via Woodbridge Road, 5% will head towards Rushmere Village and 6% will head towards the Humber Doucy Lane / Playford Road junction.

4.3.4 Beyond which, 4% of trips will head east on Playford Road towards East Suffolk and 6% of trips will head towards the A1214 eastbound towards the A12, whilst 26% will heading south towards the A1189 south towards Felixstowe.

4.4 Committed Developments

4.4.1 Currently there are no identified proposed developments within the vicinity of the site that would require to be considered as committed developments as part of the Phase 1 proposal, however this will need to be discussed further with Suffolk County Council and Ipswich Borough Council as part of any future planning applications for both the Phase 1.

4.5 Future Year Traffic Growth

4.5.1 TEMPro v7.2 calibrated with the National Transport (NTM AF15) dataset has been used to generate traffic growth factors specific to the site's MSOA (Ipswich 004) with a base year of 2019. Growth factors for 2020 (assumed year for submission of planning application), 2025 (assumed opening year of the site) and 2036 (end of the Suffolk Coastal Local Plan period) have been derived and are presented in **Table 4.2** below.

Table 4.2: TEMPro Growth Factors

Time Period	2020 Growth Factor	2025 Growth Factor	2036 Growth Factor
AM Period	1.013	1.098	1.185
PM Period	1.013	1.099	1.186

4.6 Assessment Scenarios

4.6.1 It is proposed to carry out assessments of the following scenarios for the AM and PM peak hour periods:

- 2020 Future Year + Development (AM and PM peak hour);
- 2025 Future Year + Development (AM and PM peak hour); and
- 2036 Future Year + Development (AM and PM peak hour).

4.7 Junction Capacity Assessment

4.7.1 Industry standard software package, Junctions 9 (PICADY), has been used to assess the capacity of the proposed site access junction.

4.7.2 In terms of modelling results, a Ratio of Flow to Capacity (RFC) value of 0.85 or less typically demonstrates that a junction arm or turning movement is operating within practical capacity and is therefore unlikely to experience regular queuing. However, junctions that are operating between 0.85 and 1.00 are considered to be operating within theoretical capacity. Any junction operating over 1.00 is considered to be operating outside of acceptable thresholds of capacity. The queue results are measured in vehicles and the delay results are measured in seconds per vehicle.

4.7.3 The baseline flows are discussed in **Section 3.3**. The above TEMPro factors have been applied for the 2019 flows in order to utilise in the junction capacity modelling

4.7.4 A summary of the modelling results for the site access junction are presented below in **Table 4.3**, and the full PICADY outputs are included in **Appendix A**.

Table 4.3: Site Access Junction Capacity Assessment

Approach	AM Peak Hour (08:00 – 09:00)		PM Peak Hour (17:00 – 18:00)	
	Queue (Veh)	RFC	Queue (Veh)	RFC
2020 Baseline + Proposed Development				
Site Access	1	0.09	0	0.04
Humber Doucy Lane	0	0.03	1	0.09
2025 Future Year + Proposed Development				
Site Access	1	0.09	0	0.04
Humber Doucy Lane	0	0.04	1	0.09
2036 Future Year + Proposed Development				
Site Access	1	0.09	0	0.04
Humber Doucy Lane	1	0.04	1	0.09

4.7.5 **Table 4.3** above indicates that the proposed site access onto Humber Doucy Lane will operate within practical capacity during the morning and evening peak hour periods for all of the scenarios assessed.

4.8 Wider Highway Network Impact

4.8.1 As well as immediate traffic impacts on the proposed site access, the wider distribution pattern detailed within **Figure 4.1** indicates that the delivery of the 200 dwellings for Phase 1 will have a highways impact upon the following key junctions in the local area and will need to be assessed in more detail as part of any future planning application or further study work;

- Humber Doucy Lane / Tuddenham Road Priority Junction;
- Humber Doucy Lane / Rushmere Road / The Street Rushmere Roundabout;
- Humber Doucy Lane / Sidegate Lane priority junction;
- Sidegate Lane West / A1214 Colchester Road junction;
- A1214 Colchester Road / Tuddenham Road Roundabout; and
- Rushmere Road / Colchester Road roundabout.

4.8.2 The traffic impact of the wider site will also need consider the junctions detailed above but due to the possibility of assigning trips to the Ipswich Northern Route (Inner Option), a new traffic distribution and assignment assessment will need to be undertaken if the current position for Suffolk County Council changes.

5 Travel Planning

5.1 Introduction

- 5.1.1 An important component of delivering a residential development is the provision of appropriate sustainable transport infrastructure and supporting measures to promote the uptake of sustainable transport from the outset.
- 5.1.2 Some of the measures will increase the sustainability of the site by improving the level of public transport and walking/cycling (as discussed in the **Chapter 2**), and as a result will have a longer-term delivery timescale. Other measures will be site specific and can be more readily introduced in order to promote sustainable travel amongst future residents.

5.2 Travel Plan

- 5.2.1 The promote travel away from single occupancy vehicles a comprehensive Travel Plan should be delivered as part of the future planning application and will be delivered in line with Suffolk County Council guidance. It is likely that the Travel Plan will include measures such as welcome packs, doctor bike sessions, cycle training and potential subsidies towards public transport tickets and cycle equipment.
- 5.2.2 The Travel Plan will be managed by a dedicated co-ordinator and will be monitored in relation to a series of agreed targets in consultation with East Suffolk Council and Ipswich Borough Council as key stakeholders.

5.3 Pedestrian and Cycle Improvements

- 5.3.1 The proposals will include a network of pedestrian and cycle routes throughout the site to link with existing provision in the surrounding area; as including along the existing advisory cycle route along Humber Doucy Lane.
- 5.3.2 In addition, the cycle network will accommodate future provision to connect to the 'Inner' option of the Ipswich Northern Route (if this is route that is progressed). It is anticipated that a 3m cycleway will be provided alongside the carriageway to connect the site towards the A14 and the A12, as well as a number of villages enroute.
- 5.3.3 Cycle parking will be provided to meet the standards prescribed by Suffolk County Council and include visitor parking in public spaces. Complementary infrastructure should also be provided such as fixed bike pumps and tool kits.

5.4 Car Clubs

- 5.4.1 Car Clubs could be introduced for the future residents of the development to provide an alternative for those who do not require regular use or ownership. There are potential partnerships with existing providers such as 'Enterprise Rent-a-Car' that should be explored in the future.
- 5.4.2 The benefits of a car club are as follows:
- Access to vehicles without financial burden of ownership;
 - No maintenance cost;
 - UK wide access; and

- Vehicles can be reserved in advance or last minute.

5.4.3 Car clubs typically work by providing residents/customers with an individual membership card to allow instant access to the network of vehicles within the car club. The schemes generally work through a dedicated app, through which residents can book a car when required.

5.4.4 A number of car club operators are transferring towards hybrid or electric vehicles which have clear benefits in terms of positively contributing towards the nationwide air quality targets.

5.4.5 Typically, there is a membership fee for the year and driving hours are paid for by credits. A developer would generally pre-load membership cards to an agreed level of credits for residents in order to sample the scheme and allow travel habits to form and to adopt to the car club scheme.

5.5 Electric Vehicle (EV) Charging Points

5.5.1 Local policy guidance seeks to promote electric vehicles by providing the appropriate infrastructure from the outset in order to facilitate use of electric and hybrid vehicles. The proposed site will provide electric vehicle charging facilities in line with current policy guidelines.

6 Summary and Conclusion

6.1 Summary

- 6.1.1 This transport feasibility study has been prepared on behalf of Bloor Homes in regard to the proposed residential development to the north east of Humber Doucy Lane. The initial land parcel of the development is expected to provide circa 200 dwellings, with the site acting as a possible gateway for a further 1,200 dwellings and a connection to the potential Ipswich Northern Route (Inner Route). Whilst we understand that Suffolk County Council are not proceeding with the next stage of the business case into the Northern Relief Road, as confirmed at the Cabinet meeting on 25th February 2020, should this change in the future, the proposed Site can assist in the delivery of the Road. With Bloor Homes controlling a large part of the land to the north of Humber Doucy Lane, it is uniquely placed to be able to assist in the delivery of a relief road if required in the future.
- 6.1.2 The current situation in terms of sustainable transport has been explored and the key findings are summarised below:
- There are numerous local amenities accessible for the new residents to use however, should the full quantum of development come forward (up to 1,400 dwellings) it will be necessary to include additional local amenities within the proposals;
 - Following a review of the most recent Personal Injury Collision records, there is no evidence to show the proposed development will have a detrimental impact on highway safety;
 - The pedestrian and cycle networks surrounding the Phase 1 development are of good quality, and the site is accessible from the existing bus services located along Humber Doucy Lane; and
 - Derby Road and Westerfield Rail Stations are accessible from the site and allow connection to Felixstowe, Ipswich and Lowestoft.
- 6.1.3 The Phase 1 site is proposed to be accessed via T-junction of Humber Doucy Lane. The access will include with a loop road within the site approximately 50m north of the access, providing a circuit appropriate to serve the development. In addition, the existing PRow route will be upgraded to provide a secondary emergency access on the western boundary of the site.
- 6.1.4 The proposed access junction arrangement shown on **Drawing J32-4587-PS-001**, demonstrating the appropriate horizontal visibility splays can be achieved. This access is in line with guidance set out in the Suffolk Design Guide for Residential Areas and Manual for Streets (MfS). Furthermore, through junction modelling to be suitable to provide safe access for residents of the proposed development, without negatively impacting existing nearby residents.
- 6.1.5 A trip generation and distribution exercise has been undertaken which has identified that the development traffic will head towards Ipswich Town Centre to the south west, the A14 to the west and A12 to the east via Humber Doucy Lane (as well as other villages enroute). Furthermore, the development traffic could be further distributed along additional routes if the inner option of the Ipswich Northern Route is progressed, as the proposed alignment currently passes through the wider site (just south of the railway line) and would provide the option for residents to access the bypass directly.

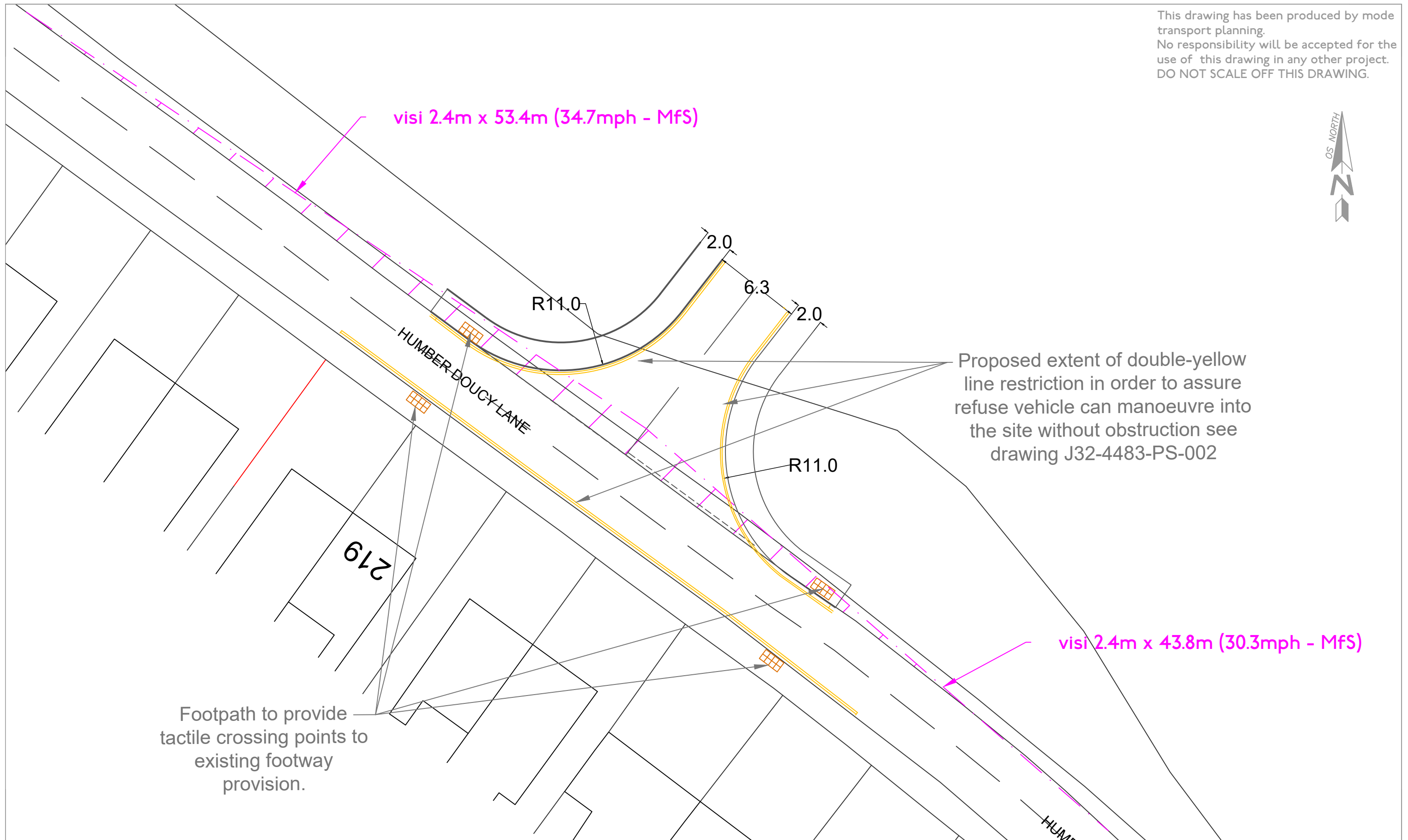
6.1.6 As part of a future planning application for Phase 1, a Travel Plan (TP) will be submitted which will set out the key aim of reducing the number of single-occupancy vehicle trips generated as a result of the development. It will also include proposals methods for implementing and monitoring the TP to achieve a modal shift. This TP can then be developed further for the wider site to provide a comprehensive sustainable transport strategy to help promote sustainable transport for the site.

6.2 Conclusion

6.2.1 In conclusion it has been demonstrated that the site could deliver a significant volume of residential development that would have access to a range of sustainable modes of transport. The proposals have been reviewed in line with the NPPF, SCC and other national best practice guidance documents and have been found to be in accordance with the transportation related policy contained within.

APPENDICES

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drawing title Indicative Access Design & Horizontal Visibility Splays	client Bloor Homes	mode transport planning LABS Atrium Stables Market Chalk Farm Road London NW1 8AH t 020 7293 0217 e info@modetransport.co.uk w www.modetransport.co.uk	scale 1:500@A3	B A	21-02-20	Revised Footway Issued
	job title Land off Humber Doucy Lane, Ipswich		drawn mf		31-07-19	
			checked pt	drawing no. J32-4483-PS-001		
			created July 19			

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Access

Egress

drawing title Refuse Vehicle Swept Path Analysis 	client Bloor Homes	mode transport planning LABS Atrium Stables Market Chalk Farm Road London NW1 8AH t 020 7293 0217 e info@modetransport.co.uk w www.modetransport.co.uk	scale 1:250@A3	A A 21-02-20 31-07-19 Revised Footway Issued
	job title Land off Humber Doucy Lane, Ipswich			
			checked pt	drawing no. J32-4483-PS-002
			created July 19	

APPENDIX A - Site Access Modelling results

Junctions 9
PICADY 9 - Priority Intersection Module
Version: 9.0.2.5947 © Copyright TRL Limited, 2017
For sales and distribution information, program advice and maintenance, contact TRL: +44 (0)1344 770558 software@trl.co.uk www.trlsoftware.co.uk
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Filename: 190724_Site Access.j9

Path: C:\Users\Mode\Dropbox (mode)\Project\London\2. Projects\J324483_Humber Doucy Lane, Ipswich\4. Data

Report generation date: 01/08/2019 12:48:52

- »2019 + Dev, AM
- »2019 + Dev, PM
- »2024 + Dev, AM
- »2024 + Dev, PM
- »2036 + Dev, AM
- »2036 + Dev, PM

Summary of junction performance

	AM				PM			
	Queue (Veh)	Delay (s)	RFC	LOS	Queue (Veh)	Delay (s)	RFC	LOS
2019 + Dev								
Stream B-C	0.1	7.58	0.08	A	0.0	6.86	0.03	A
Stream B-A	0.0	11.23	0.02	B	0.0	10.28	0.01	B
Stream C-AB	0.0	5.10	0.03	A	0.1	5.69	0.08	A
2024 + Dev								
Stream B-C	0.1	7.56	0.08	A	0.0	6.92	0.03	A
Stream B-A	0.0	11.47	0.02	B	0.0	10.51	0.01	B
Stream C-AB	0.0	4.91	0.04	A	0.1	5.63	0.08	A
2036 + Dev								
Stream B-C	0.1	7.68	0.08	A	0.0	7.01	0.03	A
Stream B-A	0.0	11.90	0.02	B	0.0	10.77	0.01	B
Stream C-AB	0.1	4.84	0.04	A	0.1	5.59	0.08	A

There are warnings associated with one or more model runs - see the 'Data Errors and Warnings' tables for each Analysis or Demand Set.

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

File summary

File Description

Title	
Location	
Site number	
Date	24/07/2019
Version	
Status	(new file)
Identifier	
Client	
Jobnumber	
Enumerator	DESKTOP-CE95GQI\ModeT
Description	

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	Veh	Veh	perHour	s	-Min	perMin

Analysis Options

Vehicle length (m)	Calculate Queue Percentiles	Calculate detailed queueing delay	Calculate residual capacity	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
5.75				0.85	36.00	20.00

Demand Set Summary

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D3	2019 + Dev	AM	ONE HOUR	07:45	09:15	15	✓
D4	2019 + Dev	PM	ONE HOUR	16:45	18:15	15	✓
D5	2024 + Dev	AM	ONE HOUR	07:45	09:15	15	✓
D6	2024 + Dev	PM	ONE HOUR	16:45	18:15	15	✓
D7	2036 + Dev	AM	ONE HOUR	07:45	09:15	15	✓
D8	2036 + Dev	PM	ONE HOUR	16:45	18:15	15	✓

Analysis Set Details

ID	Include in report	Network flow scaling factor (%)	Network capacity scaling factor (%)
A1	✓	100.000	100.000

2019 + Dev, AM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	B - Site Access - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.
Warning	Major arm width	C - Humber Doucy Lane (S) - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

Results

Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/hr)	Total Junction Arrivals (Veh)
B-C	0.08	7.58	0.1	A	35	52
B-A	0.02	11.23	0.0	B	6	8
C-AB	0.03	5.10	0.0	A	20	30
C-A					248	372
A-B					2	3
A-C					281	421

Main Results for each time segment

07:45 - 08:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	29	7	544	0.053	28	0.0	0.1	6.984	A
B-A	5	1	364	0.012	4	0.0	0.0	9.998	A
C-AB	15	4	722	0.021	15	0.0	0.0	5.093	A
C-A	205	51			205				
A-B	2	0.38			2				
A-C	230	58			230				

08:00 - 08:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	34	9	532	0.064	34	0.1	0.1	7.225	A
B-A	5	1	349	0.015	5	0.0	0.0	10.481	B
C-AB	19	5	739	0.026	19	0.0	0.0	4.998	A
C-A	243	61			243				
A-B	2	0.45			2				
A-C	275	69			275				

08:15 - 08:30

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	42	10	517	0.081	42	0.1	0.1	7.577	A
B-A	7	2	327	0.020	7	0.0	0.0	11.228	B
C-AB	26	6	764	0.034	26	0.0	0.0	4.874	A
C-A	296	74			296				
A-B	2	0.55			2				
A-C	337	84			337				

08:30 - 08:45

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	42	10	517	0.081	42	0.1	0.1	7.578	A
B-A	7	2	327	0.020	7	0.0	0.0	11.229	B
C-AB	26	6	764	0.034	26	0.0	0.0	4.876	A
C-A	296	74			296				
A-B	2	0.55			2				
A-C	337	84			337				

08:45 - 09:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	34	9	532	0.064	34	0.1	0.1	7.227	A
B-A	5	1	349	0.015	5	0.0	0.0	10.484	B
C-AB	19	5	739	0.026	19	0.0	0.0	5.002	A
C-A	243	61			243				
A-B	2	0.45			2				
A-C	275	69			275				

09:00 - 09:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	29	7	544	0.053	29	0.1	0.1	6.992	A
B-A	5	1	364	0.012	5	0.0	0.0	10.000	B
C-AB	15	4	722	0.021	15	0.0	0.0	5.097	A
C-A	205	51			205				
A-B	2	0.38			2				
A-C	230	58			230				

2019 + Dev, PM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	B - Site Access - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.
Warning	Major arm width	C - Humber Doucy Lane (S) - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

Results

Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/hr)	Total Junction Arrivals (Veh)
B-C	0.03	6.86	0.0	A	14	21
B-A	0.01	10.28	0.0	B	3	4
C-AB	0.08	5.69	0.1	A	41	62
C-A					180	270
A-B					5	7
A-C					211	317

Main Results for each time segment

16:45 - 17:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	11	3	562	0.020	11	0.0	0.0	6.540	A
B-A	2	0.56	385	0.006	2	0.0	0.0	9.409	A
C-AB	32	8	663	0.048	31	0.0	0.1	5.695	A
C-A	150	37			150				
A-B	4	1			4				
A-C	173	43			173				

17:00 - 17:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	13	3	553	0.024	13	0.0	0.0	6.669	A
B-A	3	0.67	372	0.007	3	0.0	0.0	9.755	A
C-AB	40	10	677	0.059	40	0.1	0.1	5.657	A
C-A	177	44			177				
A-B	4	1			4				
A-C	207	52			207				

17:15 - 17:30

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	17	4	542	0.030	16	0.0	0.0	6.855	A
B-A	3	0.83	354	0.009	3	0.0	0.0	10.276	B
C-AB	53	13	696	0.076	53	0.1	0.1	5.603	A
C-A	213	53			213				
A-B	6	1			6				
A-C	253	63			253				

17:30 - 17:45

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	17	4	542	0.031	17	0.0	0.0	6.855	A
B-A	3	0.83	354	0.009	3	0.0	0.0	10.276	B
C-AB	53	13	696	0.076	53	0.1	0.1	5.596	A
C-A	213	53			213				
A-B	6	1			6				
A-C	253	63			253				

17:45 - 18:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	13	3	553	0.024	14	0.0	0.0	6.672	A
B-A	3	0.67	372	0.007	3	0.0	0.0	9.758	A
C-AB	40	10	677	0.059	40	0.1	0.1	5.647	A
C-A	177	44			177				
A-B	4	1			4				
A-C	207	52			207				

18:00 - 18:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	11	3	562	0.020	11	0.0	0.0	6.541	A
B-A	2	0.56	385	0.006	2	0.0	0.0	9.413	A
C-AB	32	8	664	0.048	32	0.1	0.1	5.693	A
C-A	150	37			150				
A-B	4	1			4				
A-C	173	43			173				

2024 + Dev, AM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	B - Site Access - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.
Warning	Major arm width	C - Humber Doucy Lane (S) - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

Results

Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/hr)	Total Junction Arrivals (Veh)
B-C	0.08	7.56	0.1	A	35	52
B-A	0.02	11.47	0.0	B	6	8
C-AB	0.04	4.91	0.0	A	22	32
C-A					295	443
A-B					2	3
A-C					276	414

Main Results for each time segment

07:45 - 08:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	29	7	544	0.053	28	0.0	0.1	6.972	A
B-A	5	1	360	0.013	4	0.0	0.0	10.127	B
C-AB	16	4	749	0.021	16	0.0	0.0	4.907	A
C-A	244	61			244				
A-B	2	0.38			2				
A-C	227	57			227				

08:00 - 08:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	34	9	533	0.064	34	0.1	0.1	7.210	A
B-A	5	1	343	0.016	5	0.0	0.0	10.650	B
C-AB	21	5	772	0.027	20	0.0	0.0	4.786	A
C-A	290	72			290				
A-B	2	0.45			2				
A-C	271	68			271				

08:15 - 08:30

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	42	10	518	0.081	42	0.1	0.1	7.557	A
B-A	7	2	321	0.021	7	0.0	0.0	11.468	B
C-AB	28	7	805	0.035	28	0.0	0.0	4.630	A
C-A	352	88			352				
A-B	2	0.55			2				
A-C	331	83			331				

08:30 - 08:45

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	42	10	518	0.081	42	0.1	0.1	7.558	A
B-A	7	2	321	0.021	7	0.0	0.0	11.468	B
C-AB	28	7	805	0.035	28	0.0	0.0	4.632	A
C-A	352	88			352				
A-B	2	0.55			2				
A-C	331	83			331				

08:45 - 09:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	34	9	533	0.064	34	0.1	0.1	7.215	A
B-A	5	1	343	0.016	5	0.0	0.0	10.653	B
C-AB	21	5	772	0.027	21	0.0	0.0	4.790	A
C-A	290	72			290				
A-B	2	0.45			2				
A-C	271	68			271				

09:00 - 09:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	29	7	544	0.053	29	0.1	0.1	6.980	A
B-A	5	1	360	0.013	5	0.0	0.0	10.129	B
C-AB	16	4	749	0.021	16	0.0	0.0	4.909	A
C-A	244	61			244				
A-B	2	0.38			2				
A-C	227	57			227				

2024 + Dev, PM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	B - Site Access - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.
Warning	Major arm width	C - Humber Doucy Lane (S) - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

Results

Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/hr)	Total Junction Arrivals (Veh)
B-C	0.03	6.92	0.0	A	14	21
B-A	0.01	10.51	0.0	B	3	4
C-AB	0.08	5.63	0.1	A	43	64
C-A					197	296
A-B					5	7
A-C					228	343

Main Results for each time segment

16:45 - 17:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	11	3	558	0.020	11	0.0	0.0	6.581	A
B-A	2	0.56	380	0.006	2	0.0	0.0	9.540	A
C-AB	32	8	671	0.048	32	0.0	0.1	5.634	A
C-A	165	41			165				
A-B	4	1			4				
A-C	187	47			187				

17:00 - 17:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	13	3	549	0.025	13	0.0	0.0	6.720	A
B-A	3	0.67	365	0.007	3	0.0	0.0	9.924	A
C-AB	41	10	686	0.060	41	0.1	0.1	5.585	A
C-A	194	49			194				
A-B	4	1			4				
A-C	224	56			224				

17:15 - 17:30

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	17	4	536	0.031	16	0.0	0.0	6.922	A
B-A	3	0.83	346	0.010	3	0.0	0.0	10.507	B
C-AB	55	14	708	0.078	55	0.1	0.1	5.519	A
C-A	233	58			233				
A-B	6	1			6				
A-C	274	69			274				

17:30 - 17:45

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	17	4	536	0.031	17	0.0	0.0	6.922	A
B-A	3	0.83	346	0.010	3	0.0	0.0	10.507	B
C-AB	55	14	708	0.078	55	0.1	0.1	5.517	A
C-A	233	58			233				
A-B	6	1			6				
A-C	274	69			274				

17:45 - 18:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	13	3	549	0.025	14	0.0	0.0	6.721	A
B-A	3	0.67	365	0.007	3	0.0	0.0	9.927	A
C-AB	41	10	687	0.060	41	0.1	0.1	5.574	A
C-A	194	49			194				
A-B	4	1			4				
A-C	224	56			224				

18:00 - 18:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	11	3	558	0.020	11	0.0	0.0	6.585	A
B-A	2	0.56	380	0.006	2	0.0	0.0	9.542	A
C-AB	33	8	671	0.049	33	0.1	0.1	5.634	A
C-A	165	41			165				
A-B	4	1			4				
A-C	187	47			187				

2036 + Dev, AM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	B - Site Access - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.
Warning	Major arm width	C - Humber Doucy Lane (S) - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

Results

Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/hr)	Total Junction Arrivals (Veh)
B-C	0.08	7.68	0.1	A	35	52
B-A	0.02	11.90	0.0	B	6	8
C-AB	0.04	4.84	0.1	A	23	34
C-A					323	485
A-B					2	3
A-C					302	453

Main Results for each time segment

07:45 - 08:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	29	7	539	0.053	28	0.0	0.1	7.042	A
B-A	5	1	352	0.013	4	0.0	0.0	10.351	B
C-AB	16	4	761	0.022	16	0.0	0.0	4.835	A
C-A	267	67			267				
A-B	2	0.38			2				
A-C	248	62			248				

08:00 - 08:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	34	9	527	0.065	34	0.1	0.1	7.299	A
B-A	5	1	334	0.016	5	0.0	0.0	10.948	B
C-AB	22	5	787	0.027	22	0.0	0.0	4.703	A
C-A	317	79			317				
A-B	2	0.45			2				
A-C	296	74			296				

08:15 - 08:30

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	42	10	511	0.082	42	0.1	0.1	7.678	A
B-A	7	2	309	0.021	7	0.0	0.0	11.895	B
C-AB	30	8	824	0.036	30	0.0	0.0	4.534	A
C-A	385	96			385				
A-B	2	0.55			2				
A-C	362	91			362				

08:30 - 08:45

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	42	10	511	0.082	42	0.1	0.1	7.678	A
B-A	7	2	309	0.021	7	0.0	0.0	11.895	B
C-AB	30	8	824	0.036	30	0.0	0.1	4.536	A
C-A	385	96			385				
A-B	2	0.55			2				
A-C	362	91			362				

08:45 - 09:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	34	9	527	0.065	34	0.1	0.1	7.302	A
B-A	5	1	334	0.016	5	0.0	0.0	10.952	B
C-AB	22	5	787	0.027	22	0.1	0.0	4.707	A
C-A	317	79			317				
A-B	2	0.45			2				
A-C	296	74			296				

09:00 - 09:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	29	7	539	0.053	29	0.1	0.1	7.049	A
B-A	5	1	352	0.013	5	0.0	0.0	10.356	B
C-AB	16	4	761	0.022	17	0.0	0.0	4.837	A
C-A	267	67			267				
A-B	2	0.38			2				
A-C	248	62			248				

2036 + Dev, PM

Data Errors and Warnings

Severity	Area	Item	Description
Warning	Minor arm flare	B - Site Access - Minor arm geometry	Is flare very short? Estimated flare length is zero but has been increased to 1 because a zero flare length is not allowed.
Warning	Major arm width	C - Humber Doucy Lane (S) - Major arm geometry	For two-way major roads, please interpret results with caution if the total major carriageway width is less than 6m.

Results

Results Summary for whole modelled period

Stream	Max RFC	Max delay (s)	Max Queue (Veh)	Max LOS	Average Demand (Veh/hr)	Total Junction Arrivals (Veh)
B-C	0.03	7.01	0.0	A	14	21
B-A	0.01	10.77	0.0	B	3	4
C-AB	0.08	5.59	0.1	A	44	67
C-A					213	319
A-B					5	7
A-C					251	376

Main Results for each time segment

16:45 - 17:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	11	3	554	0.020	11	0.0	0.0	6.635	A
B-A	2	0.56	374	0.006	2	0.0	0.0	9.688	A
C-AB	33	8	677	0.049	33	0.0	0.1	5.593	A
C-A	178	44			178				
A-B	4	1			4				
A-C	206	51			206				

17:00 - 17:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	13	3	544	0.025	13	0.0	0.0	6.787	A
B-A	3	0.67	359	0.008	3	0.0	0.0	10.116	B
C-AB	43	11	693	0.061	42	0.1	0.1	5.538	A
C-A	209	52			209				
A-B	4	1			4				
A-C	245	61			245				

17:15 - 17:30

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	17	4	530	0.031	16	0.0	0.0	7.009	A
B-A	3	0.83	337	0.010	3	0.0	0.0	10.772	B
C-AB	57	14	717	0.080	57	0.1	0.1	5.468	A
C-A	251	63			251				
A-B	6	1			6				
A-C	301	75			301				

17:30 - 17:45

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	17	4	530	0.031	17	0.0	0.0	7.009	A
B-A	3	0.83	337	0.010	3	0.0	0.0	10.773	B
C-AB	57	14	717	0.080	57	0.1	0.1	5.463	A
C-A	251	63			251				
A-B	6	1			6				
A-C	301	75			301				

17:45 - 18:00

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	13	3	544	0.025	14	0.0	0.0	6.788	A
B-A	3	0.67	358	0.008	3	0.0	0.0	10.120	B
C-AB	43	11	693	0.061	43	0.1	0.1	5.530	A
C-A	209	52			209				
A-B	4	1			4				
A-C	245	61			245				

18:00 - 18:15

Stream	Total Demand (Veh/hr)	Junction Arrivals (Veh)	Capacity (Veh/hr)	RFC	Throughput (Veh/hr)	Start queue (Veh)	End queue (Veh)	Delay (s)	LOS
B-C	11	3	554	0.020	11	0.0	0.0	6.638	A
B-A	2	0.56	374	0.006	2	0.0	0.0	9.692	A
C-AB	33	8	677	0.049	33	0.1	0.1	5.591	A
C-A	177	44			177				
A-B	4	1			4				
A-C	206	51			206				



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Appendix F

Sustainability Appraisal Concerns

- 1.1 The preparation of a Sustainability Appraisal to inform the Local Plan is a legal requirement, as per the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations').
- 1.2 Furthermore, the NPPF makes clear (paragraph 32) that Local Plans should be informed by a Sustainability Appraisal that meets the relevant legal requirements; and that this should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains).
- 1.3 Requirements of the SEA Regulations include the need to explain why options have been selected, and alternatives rejected; and to appraise options to the same level of detail.
- 1.4 The emerging Ipswich Local Plan is accompanied by a Sustainability Appraisal ('the SA/SEA').
- 1.5 The SA acknowledges (Section 3, paragraph xxxvi) that the Spatial Strategy proposed in the Local Plan is a combination of several of the Spatial Options, but mostly aligns with Spatial Option 1.
- 1.6 Firstly, whilst it could be said that the spatial strategy the emerging Local Plan proposes resembles Spatial Option 1 more than the other options appraised, it is not Spatial Option 1. As such, the SA does not appear to have assessed the spatial strategy within the emerging Local Plan in a manner that enables comparison to reasonable alternatives.
- 1.7 Further to this, it is problematic that the commentary in Table 2 of the SA (which seeks to explain the reason for the selection of options and the rejection of alternatives – a requirement of the SEA Regulations) refers to Spatial Option 1 as having been the option selected. This of course contradicts earlier commentary within the SA, which confirms the selected option merely most closely resembles Option 1 relative to other options appraised.

- 1.8 Turning to the appraisal of the Spatial Options against the SA objectives, we have a number of concerns and comments in relation to how Spatial Option 1 and Spatial Option 2 (increased development beyond the Borough boundary) are assessed, as set out below.

SA Objective 2 (to meet the housing requirements of the whole community)

- 1.9 In respect of Spatial Option 1 (Higher-density urban regeneration), the SA/SEA suggests that this will have a minor positive impact on SA objective 2. It merits emphasising that this SA objective refers to meeting the housing requirements of the whole community. However, nowhere within the appraisal of this option does it appear to have considered the differing housing needs of the community, and the implications for these of pursuing this option. Instead, it appears to have simply focused on the quantum of development, without considering the type. Even prior to considering this issue, the appraisal identifies concerns in relation to this option, noting that it is unlikely to meet needs on its own. We consider that such an option in focussing on higher-density urban regeneration is unlikely to meet the housing needs of all, and would result in a narrow range of types of homes being delivered, skewed heavily towards smaller, flatted accommodation. This may disadvantage those requiring larger, family homes; as well as those in need of specialist accommodation. The SA should recognise this, and the scoring adjusted accordingly.

- 1.10 In respect of Spatial Option 2, we agree that increased development beyond the Borough boundary would have a major positive effect in relation to SA objective 2. In addition, and to assist a decision-maker in comparing this with alternative options, it should be recognised that through this approach there are far greater prospects that a variety of forms of housing and accommodation will be provided which meet the needs of all of the community, including through provision of affordable housing and specialist accommodation.

SA Objective 5 (to improve levels of education and skills in the population overall)

- 1.11 In respect of Spatial Option 1 and SA objective 5, the appraisal notes that future residents in these locations would likely have good access to education services. It

should be recognised that all school-aged people in the Borough should have access to education, regardless of proximity to educational facilities. Ability to access educational facilities without reliance on a private car is of relevance to the SA/SEA (SA objective 18), but not SA objective 5.

- 1.12 The assessment of Spatial Option 1 against SA objective 5 goes on to suggest the option may result in capacity concerns in some locations. However, despite identifying what would appear to be a significant issue in relation to this SA objective, Spatial Option 1 is still given a score of minor positive in relation to this.
- 1.13 In respect of Spatial Option 2, the appraisal recognises that this approach is likely to engender fewer capacity concerns. However, it also states that access to education services in these locations may well be more limited. We consider that access is highly unlikely to be so difficult as to constitute a negative impact in relation to this particular SA objective. Again, it is more relevant to SA objective 18. As Spatial Option 2 is assessed as having a minor negative impact in relation to promoting sustainable travel, the scoring of this SA objective as a minor negative for the same reasons is, in effect, double-counting this one issue.

SA Objective 11 (to reduce vulnerability to climatic events and flooding)

- 1.14 The SA/SEA assesses Spatial Option 2 as having a minor negative impact on this SA objective, explaining that fluvial flood risk is present in and around Ipswich. It makes reference to there being areas of fluvial flood risk to the north of Ipswich.
- 1.15 In actual fact, the Environment Agency flood mapping shows that the greatest areas of Flood Zone 2/3 are located within Ipswich itself (and as such, relevant to Spatial Option 1); and to the south of Ipswich. Areas of Flood Zone 2/3 to the north are very limited. The vast majority of land to the north of Ipswich is Flood Zone 1 – land least at risk of flooding from tidal or fluvial sources. Certainly, a significant quantum of development could be accommodated to the north or east of Ipswich without having to develop land in Flood Zone 2/3. The SA/SEA's conclusion on Spatial Option 2's impact on SA objective 11 is, in our view, reliant on entirely specious reasoning.

SA objective 12 (safeguard the integrity of the coast and estuaries)

- 1.16 In relation to SA objective 12 (safeguard the integrity of the coast and estuaries), the appraisal scored Option 1 as a minor positive, and justifies this by stating:

“Option 1 would situate nearly all new development within urban locations and it is therefore unlikely that it would adversely affect the coast or estuaries. However, it would also not provide an opportunity to enhance the setting or character of the coast and estuaries”.

- 1.17 This appraisal completely overlooks that large sections of the Suffolk coast comprise Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites which are vulnerable to recreational disturbance. Recreational Disturbance Avoidance and Mitigation Strategy for Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils ('the Suffolk RAMS') confirms that the entirety of Ipswich Borough is within the Zone of Influence of European sites, i.e. it can be expected that, without mitigation measures, residents of Ipswich Borough will visit these European sites.

- 1.18 Whilst it is recognised that higher density development located within existing urban areas may be able to make financial contributions towards mitigation, their ability to incorporate Suitable Alternative Natural Greenspaces (SANGs) will of course be extremely limited.

- 1.19 In respect of Spatial Option 2 and SA objective 12, the appraisal states:

“Situating development in the rural areas could make it difficult to avoid adverse impacts on the coast and estuaries in all cases, including the biodiversity value, sensitive landscapes and heritage value prevalent here. This would be particularly the case if a new settlement were delivered.”

- 1.20 It concludes that there would be a minor negative impact.

- 1.21 We consider the SA's appraisal of Spatial Option 2 in relation to this SA objective to be wholly misconceived.

- 1.22 As noted above, the entirety of Ipswich Borough is within the Zone of Influence of the coastal SPAs, SACs and Ramsar sites. As such, development beyond the Borough boundary would be no more within the Zone of Influence than development within it. Development beyond the boundary is highly unlikely to have a direct impact (as in, encroach into any of the protected areas) on any of the estuaries or coasts, as, with the exception of the Stour and Orwell Estuaries SPA/Ramsar site, none of the estuaries or coastal areas are within such proximity to the Borough such that increased development beyond the Borough boundary would feasibly encroach into such areas. In any case, the Stour and Orwell Estuaries only has potential to be directly impacted by development to the south of the Borough.
- 1.23 The option of increased development beyond the Borough boundary has potential to incorporate SANGS and to reduce recreational disturbance of the European sites, not simply from future residents of the development, but also from existing residents within the locality. Spatial Option 2 should be seen as having a positive impact on this SA objective when compared to alternatives.

SA objective 13 (to conserve and enhance biodiversity and geodiversity)

- 1.24 Turning to SA objective 13 the appraisal in relation to this appears to be based on the misconception that greenfield land is inherently of ecological value. This is not the case. Indeed, intensively farmed agricultural land is generally of negligible ecological value, and such the ecological value of land can often be enhanced through its development.
- 1.25 In relation to Spatial Option 1, despite the appraisal text noting that it may be difficult to incorporate high quality green infrastructure into high-density, urban development, it fails to reflect this in the scoring of this option.
- 1.26 Furthermore, the text on Spatial Option 1 makes reference to landscape designations. This is an entirely different matter to biodiversity, one unrelated to this SA objective.
- 1.27 In respect of Spatial Option 2, in addition to the aforementioned flawed assumption that greenfield land is of ecological value, we note that the text notes the potential positive effects of this approach with low density development giving rise to opportunities for

ecological enhancements. However, the scoring (minor negative) does not reflect this positive effect.

SA objective 14 (to conserve and where appropriate enhance areas and assets of historical and archaeological importance)

1.28 In relation Spatial Option 1 and this SA objective, the appraisal text identifies the potential negative effects, stating as follows:

“Should taller buildings be required to meet the higher density requirements, there is greater potential for development to have an adverse impact on long-distance views and to discord with the local character. A large quantity of cultural heritage assets, including Listed Buildings, Scheduled Monuments and Conservation Areas, are situated within the urban areas of Ipswich, the setting of which could be adversely impacted by any nearby high-density developments or tall buildings”.

1.29 Notwithstanding this wholly negative assessment provided by the SA/SEA in relation to SA objective 14, the option is inexplicably scored as a positive / negative impact, rather than minor negative or major negative.

1.30 Spatial Option 2 is assessed as having a positive / negative effect on SA objective 14. However, from the commentary, it is clear that the negative impact relates to perceived concerns regarding harm to the character of rural locations.

1.31 Firstly, this is not an issue that is relevant to SA objective 14. This is more a matter for SA objective 15.

1.32 Secondly, and in any case, we do not agree with the statement that “where development takes place in rural locations it is more likely to discord with the local character and adverse impacts may be more likely”. On the contrary, it should be recognised that planning policies can, and more often than not do, insist that development responds positively to local character and context, including in rural areas. Development need not have an intrinsically harmful impact on the character of small settlements, as the SA/SEA appears to imply here.

SA Objective 15 (to conserve and enhance the quality and local distinctiveness of landscapes and townscape)

- 1.33 In relation this SA objective and Spatial Option 1, the appraisal states that:
- “With most development taking place in urban areas, it is uncertain the extent to which high density development might discord with the local townscape character”.*
- 1.34 We consider that a strategy wholly reliant on higher density development will, necessarily, result in negative impacts on the townscape. It should be recognised that Ipswich is not currently characterised by high density development, and such an approach would be very much at odds with the existing character of much of the Borough.
- 1.35 As such, we consider the assessment of Spatial Option 1 against SA objective 15 as a minor positive is unjustified.
- 1.36 In relation to Spatial Option 2, this is assessed as having a major negative impact on this SA objective. However, from the text it appears that the SA/SEA has failed to acknowledge that harm to the landscape can be mitigated and that there are likely to be a number of opportunities to provide development in locations which are not sensitive in landscape terms.
- 1.37 Furthermore, the appraisal of Spatial Option 2 in relation to this SA objective appears to have entirely overlooked the issue of townscape, instead focussing solely on landscape. It should be recognised that Spatial Option 2 will have a positive impact on landscape, by virtue of avoiding having to rely on increasing densities within the existing settlement.

SA Objective 16 (to achieve sustainable levels of prosperity and growth throughout the plan area)

- 1.38 In relation to SA objective 16, the appraisal of Spatial Option 1 identifies the potential harm of this approach to nearby market towns, but the scoring against this objective (major positive) does not reflect this concern.

Conclusion

- 1.39 As noted earlier, the Sustainability Appraisal is an important component of the Local Plan, and plays a key role in justifying the approach taken, as well as the options rejected.
- 1.40 The SA which accompanies the emerging Local Plan at this stage gives rise to a number of concerns, particularly in relation to how the selected option has been assessed (if at all), and the robustness of the assessment which resulted in it being selected and alternatives rejected.
- 1.41 In particular, the issues identified above in relation to numerous SA objectives have resulted in the Spatial Option 1 being assessed as being far more positive than should be the case.
- 1.42 Conversely, there are numerous instances where a flawed approach to assessment of Spatial Option 2 has resulted in it being assessed as unduly negative.
- 1.43 As such, the SA prepared alongside the emerging Local Plan (Regulation 19) does not provide the necessary justification of the strategy proposed by the emerging Local Plan.
- 1.44 Once the appraisal is updated to address the above, the Council should review whether the strategy it proposes is suitable; and whether the reason for rejecting alternatives is still applicable.