

22 September 2021  
Our Ref: 20.6006/Main Modifications 2021

15 De Grey Square  
De Grey Road  
Colchester  
Essex  
CO4 5YQ

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

T  
F

Sent by email only to: [planningpolicy@ipswich.gov.uk](mailto:planningpolicy@ipswich.gov.uk)

Dear Sir/Madam,

**Re: Main Modifications Consultation, Ipswich Borough Local Plan**

Ipswich School have actively and positively engaged in previous stages of the Local Plan production, including the Hearing Sessions which took place in November and December 2020 and wish to continue this involvement at the Main Modifications stage.

In its 600 year history, Ipswich School has been supported by local benefactors including Richard Felaw who in 1482 gave his house for education of boys in the town, but unlike many other private schools, Ipswich School does not have a major endowment and it therefore has to manage its assets carefully in order to be able to deliver its charitable objectives.

Ipswich School plays a major role in contributing to education in Suffolk and has a long-term strategy to open up access to the School to any worthy pupil, regardless of their ability to pay. The strategy addresses social mobility in the local community and opens pathways for deserving pupils. The School is also a significant employer in the town and provides a variety of opportunities both in terms of teaching and non-teaching roles.

The School also has significant land holdings within the Borough and is a member of the Ipswich Garden Suburb Delivery Board. Based on this history and involvement with the future of the Borough, the School has an interest in seeing the town develop as a quality environment to live and work. The aspirations of the Council as detailed within the Local Plan are welcomed and the School encourages the accelerated delivery of the Council's objectives in the coming years.

Based on this position, Ipswich School provides the comments outlined in the table below in respect of the Main Modifications identified within the consultation documents.



Main Modification	Section or Policy of the Local Plan	Comments on behalf of Ipswich School
MM28	Paragraph 8.58	Ipswich School do not consider that the Council has “thoroughly reviewed the development potential within the Borough boundary” as outlined in the Main Modification to paragraph 8.58. Ipswich School continue to maintain their long-standing view that land at Tuddenham Road, which is currently identified for “Sport Uses” is not the most appropriate use of land, when it is recognised that housing land is limited within the Borough. Had the Council undertaken a “thorough” review of all development opportunities as part of the Strategic Housing and Economic Land Availability Assessment it would have identified the opportunity for development at Tuddenham Road. MM28 is not considered to be sound as it has not been positively prepared, it is not justified and will not be effective as this strategic matter has been deferred to a future plan review. To make the plan sound, Ipswich School request that the allocation for “Sport Uses” at Tuddenham Road is amended to allow for residential development on the site which will further assist with the School’s current facilities being relocated from Notcutts Field as part of a comprehensive programme of development over the plan period. The allocation of land at Tuddenham Road will also enable the Council to significantly boost housing supply across the Borough in accordance with the National Planning Policy Framework.
MM36	Policy CS7	Ipswich School supports the revisions to the housing requirement as outlined in Policy CS7. Ensuring that the Council plan for the appropriate number of dwellings is paramount and following the Government’s standard method to quantify local housing need is supported. Ipswich School welcome the increase of units to be planned for over the plan period. MM36 is considered to be legally compliant and sound.
MM43	Policy CS10	Ipswich School support the modification to the policy which requires development proposals to “have regard to the principles, objectives and vision of the adopted SPD.” Amending the policy wording

		provides greater flexibility for landowners as they bring forward land within the IGS over the plan period. As a member of the IGS Delivery Board and a significant landowner within this strategic site, the modification is welcomed. MM43 is considered to be legally compliant and sound.
MM66	Policy CS17	Ipswich School support the modification to the policy in respect of reference to modal shift objectives within Policy CS17. Land at Notcutts Field, which is part of the Ipswich Garden Suburb, is well placed to contribute towards modal shift and the variety of sustainable transport improvements required over the plan period. MM66 is considered to be legally compliant and sound

On behalf of Ipswich School, we thank you for the opportunity to engage in the Main Modifications and continue to inform the stages of Local Plan production. We trust that the comments will be taken into account and should you have any further queries or need any further clarification or information then please feel free to contact me directly via the details below.

Yours sincerely,

**Mark Edgerley**  
Associate Director

**Tel:**

**Mob:**

**Email:** \_\_\_\_\_