

22nd September 2021
Our Ref: 21.6018

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Colchester
Essex
CO4 5YQ

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

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Dear Sir/Madam,

Re: Ipswich Local Plan Review 2018-2036 Proposed Main Modifications – Response on behalf of Seven Group

The following representations are made on behalf of Seven Group, specifically in relation to land within its ownership to the east and west of Turret Lane, Ipswich. This land forms a significant portion of site allocation IP054b, in respect of which these representations are therefore made.

This land forms part of Seven Group's wider ownership in the area, principally in the form of its established headquarters at 35-37 St Peter's Street.

My client has recently acquired the land either side of Turret Lane, but is aware that the former landowner (Mr Norman Agran – Rep ID 26319) had made representations at previous stages of the Local Plan preparation and examination process, including specifically a hearing statement relating to Matter 6 of the EIP. In wishing to ensure that the site can support growth of their business operations Seven Group is therefore keen to comment constructively on these latest developments in the emerging Local Plan.

The representations set out below therefore relate to the following Main Modifications:

- MM297 – New Policy - Land between Old Cattle Market and Star Lane (IP054b);
- PMC29 – Changes to Proposals Map;
- MM298 – New supporting text relating to this site/policy;
- MM261 – Amendments to Policy SP15.

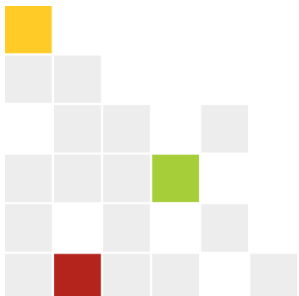
Collectively it is noted that the following captures, in summary, the nature of these changes:

“PMC29/MM297

Change: IP054b Moved from Policy SP2 to New Policy – Land between Old Cattle Market and Star Lane (IP054b)

Reason: To reflect New Policy – Land between Old Cattle Market and Star Lane (IP054b).”

The Submission version of the Local Plan identified site IP054b as land allocated for residential use (Policy SP2). Within the Main Modifications it is now proposed to be covered by a New Policy (IP054b) and shown on the Policies map as land allocated for mixed residential, employment, small scale retail uses and the electricity sub station.



The apparent change from a residential-led allocation to a more balanced mixed use approach is supported by Seven Group.

New Policy - Land between Old Cattle Market and Star Lane (IP054b) as proposed through the Main Modifications is now a criteria based policy which contains a significant number of prescriptive requirements.

The criteria appear to be drawn largely from, although notably expand upon, the details contained within the "Site Sheets" contained within Appendix 3 of the Submission plan, although with some further elements taken from other policies of the plan, as applied to the site. In the case of the former, the increased status of this information, which is now proposed to represent "Policy" as distinct from informative guidance, at this late stage in the plan making process is of concern.

A series of specific comments and objections, with associated elaboration on these general points, is set out below under each Modification.

MM297 – New Policy - Land between Old Cattle Market and Star Lane (IP054b)

We very much welcome and support the more balanced mixed use approach to the site allocation contained within this modification, and note that this is in line with the representations made by the previous land owner. Whilst the Submission draft Proposals Map had previously referred only to Residential Use, it is acknowledged that the SP2 allocations table had referred to small scale retail and leisure uses alongside the primary residential use.

Regarding this more explicitly as a mixed use site allocation is considered to be more appropriate, as too is the range of uses now referred to, most notably through inclusion of employment uses in this context.

Furthermore, reference to the new Use Class E is welcomed in bringing the policy up to date, and providing greater flexibility to future occupiers, which is considered to be in line with Government's intentions for introducing this wider ranging commercial use class. This should help to secure long-term use of the site, ensuring increased occupancy and activity levels along Turret lane, consistent with the objectives of improving the pedestrian environment as a consequence.

That said, however, we object to the intended residential element being referred to as the primary use. Given the bulk and scale of some of the existing buildings present on the allocation site as a whole, it is felt that achievement of the indicative target capacity of 40 dwellings could be secured on a relatively small portion of the site, meaning that this would not necessarily represent the primary use.

As such we would request that reference to 60% residential coverage and to residential being the primary use be deleted.

As noted above we also object to inclusion of detail previously within site sheet as detailed criteria at this late stage in the Local Plan process. It is of concern, as a matter of principle, that information previously contained as guidance or information within the Site Sheets is now proposed to be included as "Policy" through this Main Modifications process. This is on the basis that this would now have increased status in the decision making process relative to its previous presentation within an Appendix.

Whilst in some instances the presentation of requirements covered by other existing policies of the plan within this single site allocation policy is helpful, in other respects these are overly prescriptive, or would be onerous if applied as blanket requirements without having specific regard to the scale and nature of proposals being submitted.

An example of this is the requirement under criteria a. for flood risk assessment for any development proposals, or under criteria d. for archaeological assessment. A preferred approach would be to note that in all instances a degree of discretion will be applied, in accordance with the acknowledgement under criteria c. for instance, that Heritage Impact Assessment will be required on a proportionate basis.

In respect of criteria n. it should be clarified that S106 contributions will apply to residential development proposals, as distinct from uses within the other commercial use class allowed for, unless this is considered to be adequately covered by reference to the term “as appropriate.”

PMC29 – Changes to Proposals Map

Consistent with the comments set out above we support the more balanced mixed use approach to the site allocation contained within this modification to the proposals map, including reference to employment uses.

MM298 – New supporting text relating to this site/policy

It is noted that much of the text included in the proposed supporting text to this new policy has been drawn from the relevant Site Sheet previously contained within Appendix 3 of the Submission Plan. On this basis we have no objection to this, and consider that this provides generally provides helpful commentary.

Within the fourth new paragraph of supporting text it is noted that reference is made to the need for introduction of a landmark building at the corner of Star Lane and Turret Lane, highlighting the adjacent cylindrical building at the junction of Star Lane and St Peter's Street as an example of best practice in this regard. As this forms part of Seven Group's existing premises they are naturally pleased that it has been referred to in this context, and hopefully provides comfort and reassurance of their track record and willingness to work with Ipswich Borough Council to bring forward high quality development within this part of the town.

MM261 – Amendments to Policy SP15

It is noted that reference is made within this proposed modification to the support that will be given to improving the pedestrian environment on key walking routes from the Waterfront to the Central Shopping Area, including along Turret Lane. We have no objection to this strengthening of the north-south axis in this manner and consider that developments that will increase activity levels in the area whilst improving the visual appearance of the streetscene and safeguarding the existing alignment of routes through Turret Lane should support this objective.

It is trusted that the comments set out above are clear, and can be taken into consideration ahead of the plan being finalised for adoption. However should any further clarification or explanation be required, please do not hesitate to contact me.

Yours sincerely

Matt Clarke
Director, Head of Boyer Colchester

Tel:

Email: _____

Boyer

Ipswich Local Plan Review 2018-2036

Proposed Main Modifications

Consultation representation form for:

Core Strategy and Policies Development Plan Document Main Modifications
Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan
Document Main Modifications
Sustainability Appraisal of Main Modifications
Habitats Regulations Assessment of Main Modifications

Interested Parties can also comment on additional evidence submitted during and after the Hearing (these are listed in section K of the Core Documents on the Examination website documents K1-K6 and K8-K25) insofar as they relate to their representations on the Main Modifications

29th July 2021 (9.00am) – 23rd September 2021(11.45pm)

Consultation website: <https://ipswich.oc2.uk/>
Website: www.ipswich.gov.uk/mainmodifications
Email: planningpolicy@ipswich.gov.uk

Phone: 01473 432019

Council address:

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



Please return to:	planningpolicy@ipswich.gov.uk Planning Policy Planning and Development Ipswich Borough Council Grafton House, 15-17 Russell Road Ipswich IP1 2DE
Return by:	23rd September 2021 11.45 pm
This form has two parts:	Part A – Personal details
	Part B – Your representation(s).

PART A Personal Details		
	1. Personal details*	2. Agent's details (if applicable)
Title		Mr
First name	Jemma	Matt
Last name	Mansfield	Clarke
Job title (where relevant)	Property Director and General Manager	Director, Head of Boyer Colchester
Organisation (where relevant)	Seven Group	Boyer
Address Please include post code	c/o Agent	
E-mail	c/o Agent	
Telephone No.		

Signature:Date: ...23rd September 2021.....

Please note that representations cannot be kept confidential and will be available for public scrutiny. However, representations published on the Council's website will exclude your personal contact details

* If an agent is appointed and details provided above, you only need to complete the Title, Names and Organisation under Personal Details.

PART B Please complete a separate Part B for each representation you wish to make.

Your name or organisation (and client if you are an agent):	Matt Clarke, Boyer on behalf of Seven Group
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Please refer to guidance notes on completing this form.

3. Please indicate below which proposed Main Modification this representation relates to.

Main Modification number <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
MM297 / PMC29	
MM298	
MM261	

4. Please indicate below which section(s) (if any) of the Sustainability Appraisal of the Main Modifications, Habitats Regulations Assessment of the Main Modifications and/or Additional Evidence (K1-K6 and K8-K25) this representation relates to, and relate your representation to the MM specified in 3. above.

Sustainability Appraisal of Main Modifications <i>Please state which part of the SA Report</i>	N/A
Habitats Regulations Assessment of Main Modifications <i>Please state which part of the HRA Report</i>	N/A
Additional evidence submitted during and after the Hearing <i>Please use the Core Document Library reference number</i>	N/A

5. Do you consider the proposed Main Modification is:

		Please tick		Please tick
5. (1) Legally compliant	Yes	X	No	
5. (2) Sound	Yes		No	X

6. If you consider the proposed Main Modification would render the Plan unsound, please specify your reasons below (please tick all that apply below). See below for definitions.

<input type="checkbox"/>	It would not be positively prepared
<input checked="" type="checkbox"/>	It would not be justified
<input checked="" type="checkbox"/>	It would not be effective
<input type="checkbox"/>	It would not be consistent with national policy

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that

unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

7. Please give details of why you consider the Proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulations Assessment/Additional Evidence where relevant) is not legally compliant or is unsound. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the proposed Main Modification (including reference to the Sustainability Appraisal/Habitats Regulation Assessment/Additional Evidence where relevant), please also use this box to set out your comments.

Please provide details of your representation here:

Please see accompanying letter.

(continue on a separate sheet / expand box if necessary)

Please provide a concise summary of your representation here (up to 100 words):

Seven Group supports the more balanced mixed use approach to the site allocation contained within MM297 – New Policy - Land between Old Cattle Market and Star Lane (IP054b), including reference to employment amongst the range of uses. Regarding residential use as the primary use is objected to.

Introduction of information from the site sheets into the policy criteria is of concern, particularly where this is overly prescriptive. It should be clarified that all elements will be applied on a proportionate basis.

It is welcomed that Seven Group's cylindrical building has been highlighted as an example of best practice as a landmark building.

8. Please set out the changes to the Main Modification you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified at 6 above where it relates to soundness. You will need to say why this will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please specify the changes to the Main Modification you consider necessary here:

Please see accompanying letter.

(continue on a separate sheet / expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and any suggested changes.

Please ensure that Part B of your form is attached to Part A and return both to the address provided by 11.45pm on 23rd September 2021.