

21<sup>st</sup> September 2021  
Our Ref: 15.620

Planning Policy  
Planning and Development  
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Ipswich IP1 2DE

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Dear Sir/Madam,

**Re: Ipswich Local Plan Review 2018-2036 Proposed Main Modifications – Response on behalf of the East of England Co-operative Society**

The following representations are made on behalf of the East of England Co-operative Society, specifically in relation to land within it's ownership to the east of Derby Road and north of Felixstowe Road, Ipswich (Site IP010a as referred to in the Submission Local Plan).

This land forms part of the Society's wider ownership in the area, principally in the form of the Rosehill Retail Centre which comprises part of the designated Felixstowe Road District Centre (23), which they have expanded in recent years, and which lies to the south of IP010a.

My client has engaged in earlier stages of the Local Plan process and has previously submitted a pre-application enquiry to, and subsequently engaged with, Ipswich Borough Council in relation to the remaining land, in order to explore scope to bring forward an appropriate and viable development.

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

- MM201 – New Policy Felixstowe Road, IP010;
- MM202 – New supporting text relating to this site/policy;
- PMC3 – Changes to proposals map relating to this site.

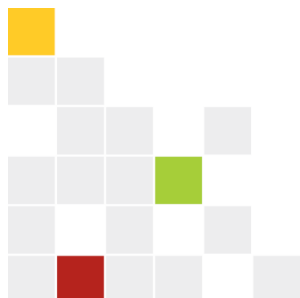
Collectively it is noted that the following captures, in summary, the nature of these changes:

**“PMC3/MM201**

**Change: IP010a and b combined and moved from Policies SP2 and SP7 to New Policy Felixstowe Road, IP010**

**Reason: To ensure New Policy – Felixstowe Road (IP010) – is sufficiently precise with regard to the reservation of land to facilitate the provision of a cycle and pedestrian bridge.”**

The Submission version of the Local Plan identified the sites at IP010a as land allocated for a mixture of residential and community use and IP010b as land allocated for residential use. Within the Main Modifications it is now proposed to be covered by one policy (IP010) and shown on the Policies map as land allocated for mixed residential and employment uses.



Land allocated for a primary school extension is also shown as an indicative location, marked with a symbol. The indicative location of a foot/cycle bridge/crossing is also annotated, consistent with the Submission version.

New Policy - Felixstowe Road (IP010) as proposed through the Main Modifications is now a criteria based policy which, as a consequence of merging requirements for both sites as set out in the allocations tables under Policy SP2 (and SP7) from the Submission document (such as percentage residential on mixed use sites; indicative capacity, density and delivery timescales) in a more generalized manner. It is felt that this results in a loss of clarity, amongst other practical considerations.

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 a loss of clarity resulting from the merging of the two sites. 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 also of concern.

A series of specific objections, with associated elaboration on these general concerns, is set out below.

#### **Object to treatment of the site as a single allocation**

Merging the two previous sites (IP010a and IP010b) under a single policy does not have regard to the different ownerships, associated aspirations and circumstances relating to each site.

Further objection below to a more generalised residential coverage provides a further specific concern on one of the consequences of this approach.

In the event that the single policy approach remains, for the avoidance of doubt, it is considered essential that any combined policy should explicitly refer to potential for each site to be delivered as a separate phase accordingly.

#### **Object to implied reduced residential coverage for western site**

Within the Submission plan a residential site coverage of 75% was presented (both within the Site Sheet and the allocations table under Policy SP2). It is now referred to as a blanket 60% residential coverage across the combined site. This is of particular concern as regard to the Submission draft reveals significant differences in approach and in turn the (albeit indicative) capacity for each individual site element (at 75% and 75 dwellings for site a; and 50% and 67 dwellings for site b), detail which has been lost through the proposed single site allocation, although the overall indicative site capacity has remained the same at 137 dwellings.

It is evident (based on previous site assessment work and the pre-application process referred to above) that a significant scale and density of development is going to be required in order to overcome substantial site preparation/remediation costs and to ensure that a viable development can be achieved. Any implied reduction in the residential site coverage, density or overall capacity achievable would therefore be unacceptable in this context.

### **Object to increased school site requirement**

It appears that the size of site required to be safeguarded for expansion of Rose Hill Primary has been increased through the Main Modifications. This is now stated as 0.8ha. Within the Submission plan it is noted that this requirement was set out explicitly as 0.5ha (within the Site Sheet) or at the most implied as 0.55ha (25% of IP010a site area of 2.22ha). No justification has been given for this increase, whilst a consequence of this being applied to future development proposals will naturally be a reduced developable residential area, with potential viability implications.

In respect of the education expansion area it is noted that the proposed supporting text acknowledges that whilst current information suggests that expansion of the school is required future forecasting may reveal different education capacity information. This appears to imply that circumstances may change. Such acknowledgement is welcomed.

Notwithstanding this it is requested that the site are required to be safeguarded in this context be returned to the previously stated 0.5ha.

### **Object to inclusion of detail previously within site sheet as detailed criteria**

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, for example and most notably the specific site layout requirements within criteria j.

### **Object to lack of explicit reference to viability considerations**

Criteria o. lists a wide range of contribution requirements, whilst Criteria n. addresses the need for a RAMS contribution. In combination, and certainly having regard for the provision of land from the western part of the site for educational use, it is considered that the range and scale of such contributions could potentially render the site unviable, particularly having regard to the high remediation costs required. It is noted that Criteria o. does include the wording “as appropriate” which could provide some comfort that a degree of discretion may be applied, although it is considered that it would be preferable that direct and explicit reference be made to such requirements being subject to viability considerations.

### **Object to bridge requirement**

Whilst it is acknowledged that requirement to safeguard a landing site for a pedestrian/cycle bridge across the railway line to link with the residential area to the north has featured in previous plans and indeed also the Submission version, it remains of considerable concern that this could further diminish the developable area of the site and harm viability of development. Furthermore reference within the proposed supporting text to the need for the development to make proportionate financial contribution towards its delivery, in addition to other contributions listed under Criteria o. and provision of land for education use (in the case of the western site) only serves to compound this issue.

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](http://www.ipswich.gov.uk/mainmodifications)  
Email: [planningpolicy@ipswich.gov.uk](mailto: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



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

<b>PART A Personal Details</b>		
	1. Personal details*	2. Agent's details (if applicable)
Title	Mr	Mr
First name	Nick	Matt
Last name	Denny	Clarke
Job title (where relevant)	Joint Chief Executive	Director, Head of Boyer Colchester
Organisation (where relevant)	East of England Co-operative Society	Boyer
Address Please include post code	c/o Agent	15 De Grey Square De Grey Road Colchester Essex CO4 5YQ
E-mail	c/o Agent	_____
Telephone No.		

**Signature: .....Date: ...21<sup>st</sup> 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.**

<b>Your name or organisation</b> (and client if you are an agent):	Matt Clarke, Boyer on behalf of East of England Co-operative Society
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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.**

<b>Main Modification number</b> <i>Please use modification reference number, e.g. MM1, MM2 etc</i>	
<b>MM201</b>	
<b>PMC3</b>	
<b>MM202</b>	

**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.**

<b>Sustainability Appraisal of Main Modifications</b> <i>Please state which part of the SA Report</i>	N/A
<b>Habitats Regulations Assessment of Main Modifications</b> <i>Please state which part of the HRA Report</i>	N/A
<b>Additional evidence submitted during and after the Hearing</b> <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"/>	<b>It would not be positively prepared</b>
<input checked="" type="checkbox"/>	<b>It would not be justified</b>
<input checked="" type="checkbox"/>	<b>It would not be effective</b>
<input type="checkbox"/>	<b>It would not be consistent with national policy</b>

**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):***

The East of England Co-operative Society objects to MM201, MM202 and PMC3 in connection with New Policy - Felixstowe Road, IP010 as follows:

- Object to treatment of the site as a single allocation;
- Object to implied reduced residential coverage for western site;
- Object to increased school site requirement;
- Object to inclusion of detail previously within site sheet as detailed criteria;
- Object to lack of explicit reference to viability considerations;
- Object to bridge requirement.

**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.***