



Planning Policy  
Planning and Development  
Ipswich Borough Council  
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**Your ref:**  
**Our ref:**  
**Date:** 23<sup>rd</sup> September 2021  
**Please ask for:**  
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Dear Mr Hone

### **Ipswich Local Plan Review – Main Modifications consultation**

Thank you for consulting East Suffolk Council on the consultation on the proposed Main Modifications to the Ipswich Local Plan Review. East Suffolk Council continues to be supportive of the Ipswich Borough Council Local Plan Review, and this response reflects comments that the Council has raised in response to the Ipswich Local Plan Review Final Draft (January 2020), the agreements made through the Statement of Common Ground between the two authorities (June 2020, document A25 in the Core Document Library) and the Hearings Statements submitted by East Suffolk Council in November 2020 on Matter 3 and Matter 6. As per our representation to the Ipswich Local Plan Review Final Draft (January 2020), the Council does not raise any issues in relation to the overall soundness of the Ipswich Local Plan, however wishes to comment on a number of the Main Modifications as set out below.

#### **MM8/MM9/MM12**

Table 8.1, setting out the housing need across the Ipswich Housing Market Area is proposed to be updated to include the more recent figures as calculated under the standard methodology. Whilst these figures reflect the ISPA Statement of Common Ground published in June 2020 (document A21 in the Core Document Library), the figure of 542 dwellings per annum, that is proposed to be deleted, is the housing requirement that has been adopted in the Suffolk Coastal Local Plan and it may therefore be more appropriate to incorporate this figure into any calculations of proposed ISPA-wide housing growth.

#### **MM14**

The proposed changes which include the addition of new criteria g) and h) to Policy ISPA2 'Strategic Infrastructure Priorities' reflect the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

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#### MM15/MM16

The proposed changes set out under MM15 and MM16 to paragraph 8.21 and Policy ISPA3 'Cross-boundary mitigation of effects on Protected Habitats and Species' reflect the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

#### MM17

The Council notes there are a number of proposed modifications to Policy ISPA4 'Cross Boundary Working to Deliver Sites', in particular to the text related to Land at the Northern end of Humber Doucy Lane. This land forms part of a cross-boundary approach to growth, with land for approximately 150 dwellings allocated in the Suffolk Coastal Local Plan under policy SCLP12.24. The Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) set out agreement on some changes to the policy, including the inclusion of reference to the maintenance of separation between Ipswich and the surrounding settlements and inclusion of provision of an early years setting, and it is noted that these changes are proposed to be incorporated. These changes bring the policy into closer alignment with Policy SCLP12.24. The Council also supports the proposed deletion of reference to Suitable Alternative Natural Greenspace being provided on both sides of the boundary, for the reasons set out in our response to the Ipswich Local Plan Review Final Draft, in order to provide an appropriate level of flexibility.

For clarity a change to one part of the proposed modifications to this policy is suggested (shown shaded below):

"23.28ha of land comprising at the northern end of Humber Doucy Lane, identified on the Policies Map as ISPA4.1, is allocated for 449 dwellings and associated infrastructure to come forward in conjunction with land allocated under Policy SCLP12.24 in the Suffolk Coastal Local Plan in East Suffolk as a cross boundary site."

#### MM49

The proposed amendments to Policy CS11 'Gypsy and Traveller Accommodation' in relation to the provision of short stay stopping sites are consistent with the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

#### MM66/MM99/MM102

The Council's response to the Ipswich Local Plan Review Final Draft set out that the Council is supportive of Ipswich Borough Council's positive commitment to the delivery and funding of modal shift mitigation through a transport mitigation strategy as part of collaborative working through the ISPA Board. The Council notes the proposed modifications to Policy CS17 'Delivering Infrastructure', under MM66, to Policy DM21 'Transport and Access in New Developments', under MM99, and to Policy DM22 'Car and Cycle Parking in New Development', under MM102, that further the Ipswich Local Plan's positive commitment to meeting the objectives for modal shift as per the Ipswich Strategic Planning Area Statement of Common Ground (document A21 in the Core

Document Library). However, under the proposed modifications to Policy CS17 it is not clear why only off-site works or financial contributions are sought towards sustainable transport improvements, as there may be opportunities for on-site measures that would support modal shift.

#### MM84/MM85

The proposed changes set out under MM84 to Policy DM8 'The Natural Environment', through the addition of the three new paragraphs related to European sites and the Recreational Disturbance Avoidance and Mitigation Strategy, and the proposed changes to paragraph 9.8.2 under MM85 reflect the Statement of Common Ground between East Suffolk Council and Ipswich Borough Council (June 2020) (document A25 in the Core Document Library) and are therefore supported.

#### MM140

The proposed Main Modification to the targets related to strategic working set out that joint master planning with East Suffolk Council of the land north of Humber Doucy Lane would be completed by 2026/27. Whilst Policy SCLP12.24 of the Suffolk Coastal Local Plan also envisages a master planned approach for the whole site, as the timescale for delivery of the site is dependent upon education infrastructure provision it may be more appropriate to refer to undertaking master planning at an appropriate point in time to facilitate development coming forward. Further, the master planning could be developer-led, and the approach should be flexible at this stage.

Please do not hesitate to contact me should you wish to discuss any of the comments above.

Yours Sincerely,

**| Principal Planner (Policy and Delivery)**

East Suffolk Council