

Date: 23<sup>rd</sup> September 2021  
Enquiries to:  
Tel:  
Email:



Dear Mr Fulcher,

### **Ipswich Borough Council Local Plan Main Modifications Consultation**

Thank you for consulting Suffolk County Council (SCC) on the main modification for the Ipswich Local Plan.

This response has been written in reference to agreed positions between the County Council and the Borough Council in Statements of Common Ground drafted prior to examination hearings, however it is noted that there are a number of new policies and SCC will also provide comment on these where appropriate.

Proposed amendments will show deleted text in ~~strike through~~ and added text in *italics*.

#### New Site Allocation Policies

It is noted that the site allocation document has been reformatted so that site allocations and their full list of constraints have been brought into policy. This approach is supported. Below, comment will be provided on policies SCC believes require amendment.

##### *New Policy For ISPA4.1*

In general SCC supports this policy, however it requires an amendment. In the Statement of common ground between IBC and SCC, the authorities agreed to include information on archaeology and a requirement to assess this site. The information has been included in a new paragraph, which is welcome, however there is not requirement for archaeological evaluation within the policy itself. In order for this part of the plan to be sound and consistent with the policy for the East Suffolk part of the site in the Suffolk Coastal Local Plan, a requirement for archaeological assessment should be included in the policy.

##### *New Policy Sites off Nacton Road, South Ravenswood*

SCC supports this policy, but suggests a change for clarity. The policy explains that parts of the Ravenswood allocations are in the Minerals Consultation Area, however does not explain the significance of this. The purpose of safeguarding mineral resources (in this instance sand and gravel) is to prevent them from becoming permanently unusable. Therefore, developments sites over a certain size (5ha) where there may be usable mineral resources should assess the quality and quantity of the mineral to determine whether some of that mineral can be used in the construction of the development. The following amendment is proposed to clarify the policy.

xiv. Sites IP150b and IP152 are over 5ha and fall within the Minerals Consultation Area *and applications should be accompanied with an assessment of the quality and quantity of sand and gravel resources on site to determine if some of this mineral can be used in the construction of the development;*

It would also be helpful if relevant policies in the Suffolk Minerals and Waste Local Plan were identified in explanatory text to the policy: Policy MP10 Minerals Consultation and Safeguarding Areas.

#### New Opportunity Area Policies

Policies which detail how development should approach the opportunity areas are supported with some amendments proposed. In particular the opportunity areas should also include the possibility for the development of community facilities to meet the needs of residential development. Specifically, SCC is mindful of the deficit of early years education places in the town centre and waterfront areas, recognised in the Statement of Common Ground between the County and Borough Councils

#### *Opportunity Area A*

The first section of the policy should include community facilities as part of the acceptable mix of uses to meet the needs of the residential population. This would make the policy consistent with the allocation for site IP037, which includes a requirement for early years facilities, as well as help to address the deficit in early years provision in the area.

Due to the close proximity of the area to sites safeguarded in the minerals and waste local plan, the second section of the plan should include the requirement “*Have regard to nearby uses safeguarded in Suffolk minerals and waste planning policy.*”

#### *Opportunity Area B*

Similar to opportunity area A, it would be helpful to include community uses to meet the needs of residents, such as early years facilities.

#### *Opportunity Area C*

Part f of this policy should be amended to “*school and early years education*” to help meet the deficit of early years places in the area.

#### *Opportunity Area E*

Similar to opportunity area A, it would be helpful to include community uses to meet the needs of residents, such as early years facilities.

#### *Opportunity Area F*

Part d of this policy should be amended to: Residential *and community* uses where appropriate within mixed use developments adjacent to the river.

#### *Opportunity Area G*

Part a of this policy should be amended to: Residential *and community* uses where appropriate within mixed use developments adjacent to the river.

Due to the close proximity of the area to sites safeguarded in the minerals and waste local plan, the second section of the plan should include the requirement “*Have regard to nearby uses safeguarded in Suffolk minerals and waste planning policy.*”

#### *Opportunity Area H*

Due to the close proximity of the area to sites safeguarded in the minerals and waste local plan, the second section of the plan should include the requirement “*Have regard to nearby uses safeguarded in Suffolk minerals and waste planning policy.*”

#### Gypsie Traveller Site Allocation IP400

It is noted that site IP400 is a new site added to meet the needs of Gypsies and Travellers and that IBC consulted SCC directly as landowners and the Corporate Property department has responded directly. Their response has been included as an appendix, for completeness.

In addition to comments from SCC corporate property we would like to raise the following.

Expanding an already established site provides a simple solution to meet need to find appropriate land for this type of housing. It also could give an opportunity to integrating new families or families who would struggle to find a plot to live on by themselves.

However this is not in line with the previous experience of the County Council. In our experience the more successful Traveller communities are usually smaller with the same families on them or close friends. It is our understanding that this is their preferred way of life as many do not necessarily like living amongst other gypsy or travellers in large groups. In larger mixed groups there are usually the more dominant families who try to exert control over a site, which means distrust and conflict amongst the rest of the families or even fear.

Suffolk County Council's view is that careful consideration should be given and mitigations put in place if the expansion is to include families who are not closely linked to the existing residents.

### Education

#### *Early Years*

The inclusion of the early years setting in policy IP037 is welcome, however in order to be clear about the requirements of the site it is recommended that the policy specify the land area for the early years requirement. Table 80 identifies that 90 places should be provided on this site. SCC would request, 1292.7m<sup>2</sup> or 0.13ha (rounded up).

The New Policy for the Mint Quarter includes does not include the early years setting associated with the primary school, which is recognised in Table 8a, is not included in the policy. For completeness the policy should be amended to state: "Mint Quarter/Cox Lane East Regeneration Area facing Carr Street (IP048d): 0.43ha for a primary school *and early years provision*"

### Minerals and Waste Planning Policy

The main modifications have included most of the agreed additions set out in the SoCG between SCC and IBC with regards to minerals and waste, which is welcome. However, there are some sites near safeguarded facilities which have not been acknowledged, or there are inconsistencies of policy wording between sites. In order to be clear and unambiguous to developers and decisions makers these issues are highlighted and amendments suggested

#### *Site Allocation Policy IP003*

In part 'b' of this policy, it is recommended that the word "retention" is replaced with the word "safeguarding". This would make the language of the policy more in line with chapter 17 of the NPPF and the Suffolk Minerals and Waste Local Plan

#### *Site Allocation Policy IP004*

The current wording of part i of this policy is: "The site is close to uses which are safeguarded through the Suffolk Waste and Minerals Local Plan (2020)". While this does highlight the relationship it does not explain the significance of being near a safeguarded site, or what may be expected of developers and decision makers because of it.

For consistency and clarity it is recommended that the wording in other policies near to safeguarded minerals and waste sites is used, which is: *“The site allocation is within 250m of a safeguarded waste use site and concrete batching plant in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the minerals and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby facilities”*

While the safeguarded sites near to IP004 are part of IP003, and will require relocation when IP003 is redeveloped, safeguarding will still be a material consideration in planning decisions while the waste and concrete batching site are operational.

#### *Site Allocation Policy IP037*

The policy acknowledges there is a relationship with safeguarded waste sites. However, while this does highlight the relationship it does not explain the significance of being near a safeguarded site, or what may be expected of developers and decision makers because of it.

For consistency and clarity it is recommended that the wording in other policies near to safeguarded minerals and waste sites is used, which is: *“The site allocation is within 250m of a safeguarded waste use site, a railhead and wharves in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the mineral and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facilities”*

#### *Site Allocation Policy IP080*

The policy acknowledges there is a relationship with safeguarded a safeguarded minerals site. However, while this does highlight the relationship it does not explain the significance of being near a safeguarded site, or what may be expected of developers and decision makers because of it.

For consistency and clarity it is recommended that the wording in other policies near to safeguarded minerals and waste sites is used, which is: *“The site allocation is within 250m of a safeguarded railhead and wharves in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the mineral and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby waste facilities”*

#### *Site Allocation Policies IP119, IP120b and IP279*

These site allocation policies do not recognise two safeguarded minerals and waste sites within 250 meters. These policies should contain the following text.

*“The site allocation is within 250m of a safeguarded waste use site and concrete batching plant in the SMWLP. It should be demonstrated that the development of the site allocation does not prevent the minerals and waste facilities from operating as normal, and that the users of the proposed development are not adversely impacted by the presence of the nearby facilities”*

While the safeguarded sites near to these allocated sites are part of IP003, and will require relocation when IP003 is redeveloped, safeguarding will still be a material consideration in planning decisions while the waste and concrete batching site are operational.

## Transport

### *Policy CS5*

The aim of 15% modal shift in this policy is very welcome.

### *Thresholds for Transport Assessments and Transport Statements*

It is noted that thresholds for transport statements and transport assessments has been updated to align with new use class order. It is also appears that the thresholds match the guidance in SCCs travel plan guidance in order to align TAs, TSs and TP's which is supported. The TP Guidance has not yet been updated to reflect the new Use Class Order, however SCC would appreciate discussion with IBC before the policy is finalised to ensure that both organisations are aligned in the approach to using the thresholds.

*Policy SP16 Transport Proposals in the IP-One Area*

Modifications to this policy are supported

*Policy SP17 Town Centre Car Parking In the IP-One Area*

Modifications to this policy are in line with what is agreed in statements of common ground between the Borough and County Councils and is and is supported.

*New Policy For Sustainable Transport Outside of IP1 Area*

SCC supports this policy, but suggests there could be some improvements. Reference to adopted cycling and walking infrastructure strategies of both the councils could be mentioned in the policy, not just the explanatory text, and projects contributing to the Transport Mitigation Strategy for ISPA.

The second paragraph could also make reference to improving the quality of PRow themselves, as well as linkages to them. Below are suggested amendments

"The Council will seek opportunities to deliver specific sustainable travel infrastructure improvements outside the IP-One Area through safeguarding sites/routes where necessary, new developments and/or seeking funding opportunities. *In particular opportunities will be sought to deliver routes that implement the Ipswich Cycling Strategy, Suffolk County Council Walking and Cycling Infrastructure Plan and The Transport Mitigation Strategy for the Ipswich Strategic Planning Area.*

Throughout the Borough, development should improve linkages to *and quality of* the public rights of way network, including cross boundary links, where opportunities exist to do so."

-----

I hope that these comments are helpful. SCC is always willing to discuss issues or queries you may have. As previously mentioned the County Council is willing to discuss anything raised in this response.

Yours sincerely,

Senior Planning and Growth Officer  
Growth, Highways, and Infrastructure

**Appendix 1: Message from SCC Corporate Property on proposed extension to West Meadows Travellers site.**

“Dear Sirs,

I refer to your letter of 28th July (copy attached) , which has only recently reached me, regarding a proposal to increase the number of pitches within the West Meadows site.

As you may be aware SCC is no longer the owner of the WM site, which was sold to a management company owned by the residents, it does however retain a roadside strip of land across the frontage (with which to protect future use).

It is our belief that the current rights of way over the roadside strip, as currently enjoyed by the residents, are adequate to support additional pitches (i.e. SCC can prevent change of use but not intensification).

I do not, therefore, believe there are any comments SCC would wish to make on the proposal in its capacity as landowner. It is, however, possible that my colleagues in other directorates of SCC may wish to comment from a planning or community perspective and, if they do, I have drawn their attention to the deadline for submissions of 23rd September.

regards

Senior Manager Corporate Property