

COMMITTEE: COUNCIL **REF NO:** C/14/02
DATE: 17 SEPTEMBER 2014
SUBJECT: IPSWICH GARDEN SUBURB –
INTERIM ADOPTION OF DRAFT
SUPPLEMENTARY PLANNING
DOCUMENT
PORTFOLIO HOLDER: COUNCILLOR JONES
HEAD OF SERVICE: MATTHEW LING

Short description of report content and the decision requested:

Following statutory public consultation on the draft Supplementary Planning Document (SPD) for the Ipswich Garden Suburb (IGS) (previously referred to as the Northern Fringe) area of Ipswich, this report summarises the changes considered necessary and appropriate in response to the feedback received. The SPD relates only to the area covered by CS10 of the adopted Core Strategy (CS) and does not introduce new policies. It is recommended that the draft SPD is approved as interim guidance prior to full adoption, in order for the SPD to have greater weight as a material consideration in the determination of any planning applications. Full adoption of the SPD is anticipated in late 2015 following adoption of the Core Strategy and Policies development plan document review.

Ward(s) affected:

Rushmere, St Margaret's, Castle Hill and Whitton.

List of Appendices included in this report:

- a) Appendix 1 – Policy CS10 from adopted Core Strategy 2011*
- b) Appendix 2 – Revised Policy CS10 from proposed Core Strategy Focused Review*
- c) Appendix 3 – Residents Responses - Summary of Comments*

- d) *Appendix 4 – Northern Fringe Protection Group pro forma Responses - Summary of Comments*
- d) *Appendix 5 – Consultee Responses – Summary of Comments*
- e) *Appendix 6 – Northern Fringe Protection Group Letter – Summary of Comments*
- f) *Appendix 7 – Save Our Country Spaces Letter – Summary of Comments*
- g) *Appendix 8 – Other Interested Parties – Summary of Comments*
- h) *Appendix 9 – Developers Responses – Summary of Comments*
- i) *Appendix 10 – East of England Design Review Panel Letter*
- j) *Appendix 11 – East of England Design Review Panel – Summary of Comments*
- k) *Appendix 12 – SA / SEA Responses – Summary of Comments*
- l) *Appendix 13 – Amendments to Figure 11 of draft SPD*
- m) *Appendix 14 – Amendments to Infrastructure Tables in draft SPD*
- n) *Appendix 15 – Ipswich Conservation and Design Panel Minutes 29/05./14*
- o) *Appendix 16 – Crest response to East of England Design Review Panel comments*
- p) *Appendix 17 – Letter from Ben Gummer MP*
- q) *Appendix 18 – Note of ATLAS engagement with preparation of Ipswich Northern Fringe Draft SPD (September 2013)*
- r) *Appendix 19 – NHS England note dated 09/07/14*
- s) *Appendix 20 – SA Addendum*
- t) *Appendix 21 – Ben Gummer and Conservative Group Representations following Executive 14th August 2014*
- u) *Appendix 22 – Liberal Democrats Group Representations following Executive 14th August 2014*

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This report was prepared after consultation with:

Legal Services

Finance and Procurement

Internal and External consultees – see report

The following policies form a context to this report:

Adopted 2011 Core Strategy and Policies Development Plan Document -
policies as listed in appendix 1 of the draft SPD.

Building a Better Ipswich

LIST OF BACKGROUND PAPERS AS REQUIRED BY LAW

*(papers relied on to write the report but which are not published and do not
contain exempt information)*

1. None

OTHER HELPFUL PAPERS

*(papers which the report author considers might be helpful – this might
include published material)*

- 2. Draft Supplementary Planning Document Ipswich Garden Suburb**
- 3. Strategic Environmental Assessment and Sustainability Appraisal
November 2013**
- 4. Draft Preliminary SuDS (Sustainable Drainage System) Strategy
2013 Northern Fringe**
- 5. Secretary of State letter 30 September 2010 dismissing appeal by
Mersea Homes against refusal of planning application
IP/09/00465/OUT for approx. 1000 dwellings in the Northern Fringe**
- 6. Executive Report E/11/59 – Adoption of Ipswich Borough Council
Core Strategy and Policies Development Plan Document, 13th
December 2011**
- 7. Executive Report E/13/22 – Ipswich Local Development Scheme
Review, 16th July 2013**
- 8. Executive Report E/13/45 – Ipswich Local Plan: Core Strategy
Focused Review and Site Allocations, 15th October 2013**
- 9. Executive Report E/12/18 – Management, Constitution and
Working Method for Preparation of Northern Fringe
Supplementary Planning Document, 24th July 2012**
- 10. Executive Report E/12/52 – Northern Fringe – Issues and Options
27th November 2012**

- 11. Executive Report E/13/60 – Northern Fringe – Draft Supplementary Planning Document Ipswich Garden Suburb and Sustainability Appraisal, 26th November 2013**
- 12. IBC dedicated Northern Fringe (Ipswich Garden Suburb) web page for evidence base documents and background information**
<https://www.ipswich.gov.uk/taxonomy/term/699>
- 13. Adopted Core Strategy and Policies Development Plan Document 2011**
- 14. National Planning Policy Framework 2012**
- 15. National Planning Policy Guidance 2014**
- 16. Draft Core Strategy Focused Review and Draft Site Allocations and Policies Development Plan Document October 2013**
- 17. Adopted Core Strategy and Policies Development Plan Document 2011.**

1. Introduction

- 1.1 At the Executive Committee meeting on 26th November 2013, the Executive resolved to approve, for the purposes of public consultation, the draft Ipswich Garden Suburb (IGS) Supplementary Planning Document (SPD) and the Sustainability Appraisal incorporating Strategic Environmental Assessment, together with an eight week period of public consultation to be carried out by the Head of Development and Public Protection. It was also resolved at the meeting that the results of the public consultation and any proposed amendments to the draft SPD, would be reported back.
- 1.2 This report sets out the feedback received in response to the public consultation, along with commentary on how the consultation responses are addressed in the draft SPD and where appropriate certain amendments to the draft SPD are considered necessary. A summary of responses and resultant SPD amendments are outlined in this report.
- 1.3 A copy of the consultation draft of the SPD which was produced for public consultation, can be viewed online using the following web address:-
[https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_Northern_Fringe_Garden_Suburb_SPD_v12 - Draft for Public Consultation.pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_Northern_Fringe_Garden_Suburb_SPD_v12_-_Draft_for_Public_Consultation.pdf). A revised version of the draft with recommended changes has been produced and accompanies this report. Colour versions are available by request or online. The Sustainability Appraisal (Strategic Environmental Assessment) is also available online using the following web address:-
[https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_Northern_Fringe_SPD_SA_Report - 13-11-2013 - FINAL 9 .pdf](https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/ipswich_Northern_Fringe_SPD_SA_Report_-_13-11-2013_-_FINAL_9_.pdf)
- 1.4 The report recommends the draft SPD is approved as interim guidance following the proposed amendments identified. Full adoption of the SPD cannot take place until the Core Strategy and Policies Focused Review is adopted, which is scheduled for October 2015. Given the fact that a planning application for part of the IGS site has been submitted, interim adoption is considered to give greater weight to the draft SPD as a material consideration when determining any forthcoming planning applications prior to adoption of the SPD.
- 1.5 The proposed SPD has been prepared in recognition of the Secretary of State's views on an appropriate planning approach to this area.

2. Background

History of draft SPD development

- 2.1 The draft SPD is the result of several years of work to bring forward the mainly agricultural land between Westerfield village and Henley Road / Tuddenham Road as a major urban extension as identified in the adopted Core Strategy. The Core Strategy was adopted by the previous administration. Since the Core Strategy was adopted in December 2011, work has progressed on this SPD
- 2.2 The development of the IGS involves major challenges due to its large scale, multiple ownership, the need to incorporate a wide range of supporting infrastructure and the mitigation of impacts on local communities.
- 2.3 An urban extension on this scale needs a co-ordinated master plan approach so as to ensure a properly integrated community is formed with the necessary supporting infrastructure provided in the right place and at the right time. The Government supported this approach by IBC when dismissing a planning appeal for piecemeal development of part of the Northern Fringe in 2010 (Mersea Homes appeal – land south of rail line between Henley Road and Westerfield Road).
- 2.4 This co-ordinated approach was then endorsed via the adopted Core Strategy 2011 (see Policy section below) as a key prerequisite for the Northern Fringe development.
- 2.5 Following the appeal process, the principal interested developers (Crest, Mersea Homes and Ipswich School) made the welcome decision to work together, with the Council, to establish a satisfactory way forward, and officers designed a management approach to the production of the SPD with extensive professional input from David Lock Associates (DLA). Additionally, representatives of the Advisory Team for Large Applications (ATLAS) from the Homes and Communities Agency have provided substantial support to the project, and a summary of their involvement and view of the process is included at Appendix 18.
- 2.6 Executive Committee on 24th July 2012 agreed to a management plan for the preparation of the SPD. This involved the setting up of a variety of Groups/Panels to inform the process as follows. The Community Steering Panel was established representing Westerfield Parish Council, Save our Country Spaces (SoCS), the Northern Fringe Protection Group (NFPG), the Ipswich Society and ATLAS, as well as IBC councillors. The Spatial Planning Working Group and Transport Working Group comprising IBC and Suffolk County Council officers and the developers' technical advisors were also formed. The Development Steering Group was the main body steering the direction of the project

and comprised landowners, developers and their technical advisors, IBC/SCC professional staff, and ATLAS. IBC facilitated and chaired all of these bodies and input from all of the groups has been valuable in moulding the SPD.

- 2.7 Executive Committee in November 2012 considered an Issues and Options Document prepared by DLA. This set out three Options for the disposition of uses based on a common land use budget incorporating a nominal 100ha of land for housing. An initial Strategic Environmental Assessment and Sustainability Appraisal Report of the Issues and Options document was also undertaken, and the draft SPD's response to the recommendations in that report is included at para 1.31 of the draft SPD.
- 2.8 Executive agreed to public consultation on the Options. Based on the consultation responses and other planning considerations, Option 2 was selected for further development (see paras 1.19 within the draft SPD) and the draft SPD has now been worked up on this basis.
- 2.9 The key purpose of the draft SPD is to guide the development of the IGS area (previously known as the Northern Fringe) as a whole and identify the infrastructure needed to ensure delivery of the IGS on a comprehensive basis. Guiding the development is essential given the numerous landowners/developers involved whose objectives do not necessarily align. They include Mersea Homes, Crest Strategic Projects, Ipswich School, Fonnereau Estates and CBRE.
- 2.10 Following 18 months of a multi-disciplinary team of planners, highway engineers, surveyors, urban designers, drainage engineers and others working together with developers, community groups and other stakeholders, a development framework for the IGS was produced.
- 2.11 The framework was then prepared in the form of a draft SPD and following approval of the Executive in November 2013, the draft document underwent a period of public statutory consultation.

Strategic Environmental Assessment and Sustainability Appraisal (SEA/SA)

- 2.12 A Strategic Environmental Assessment and Sustainability Appraisal (SEA/SA) has been commissioned by the Council with a view to optimising the provisions of the document in terms of social, economic and environmental sustainability. A report dated 12th September 2013 was received from Hyder Consulting and sets out recommendations for further improvement of the SPD. These recommendations were incorporated into the draft SPD. The SEA/SA was then updated (13th November 2013) and this update considers whether there are reasonable alternative approaches to the disposition of uses, density etc. but concludes that the draft SPD proposals are the best option for the reasons given.

- 2.13 The Core Strategy Review proposes amendments to policy CS10 and includes an Infrastructure table relating to the IGS. This will be subject to a separate sustainability appraisal under the review process. This will evaluate further the robustness of the IGS allocation, although it is noted that the first phase of IGS has been adopted through the Core Strategy (2011).
- 2.14 The updated, November 2013 SEA/SA was also consulted on as part of the draft SPD public consultation. Specific comments related to this have been received and are summarised within the 'Consultations' section of this report.

Public Consultation of draft SPD and SEA/ SA

- 2.15 The period of consultation ran from Monday 13th January 2014 to Monday 10th March 2014. Public notices and a total of 3,925 letters and e-mails were sent to notify residents and interested parties of the consultation period as well as details of a series of public exhibition events.
- 2.16 A total of 518 people were recorded as attending the public exhibitions over ten days. The exhibition also covered the consultation on Core Strategy Focused Review and Site Specific Allocations proposals.
- 2.17 A range of responses were received and are summarised within the Consultations section of this report.

Planning Applications

- 2.18 A planning application for the majority of the Fonnereau site was received in summer 2014.

Executive Committee Meeting 14th August 2014

- 2.19 Ben Gummer MP spoke at the Executive meeting on 14th August 2014 and written representations from him, the Conservative Group and the Liberal Democrat Group were received following the above meeting and these have been reported and addressed in the 'Consultations' section of this report.
- 2.20 Executive Committee authorised the Head of Development and Public Protection, in consultation with the Portfolio Holder for Planning, to make minor changes to the SPD wording and layout to ensure the document is easier to understand without materially changing the meaning of the contents. A small number of changes are being proposed that are made within the authority given by this resolution. These are set out in paragraphs 5.96 and 12.5 b) & s) of this report.

3. Relevant Policies

- 3.1 Building a Better Ipswich, the following themes are relevant to the SPD: A Stronger Ipswich Economy; Keeping Ipswich Moving; Quality Housing for All; and A Greener Ipswich.

National Planning Policy Framework (NPPF)

- 3.2 Paragraph 153 of the NPPF states:-

*Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified. **Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.***

- 3.3 The National Planning Policy Guidance (NPPG) 2014, which has recently been produced to replace the previous suite of planning practice guidance, advises that supplementary planning documents should be prepared only where necessary and should build upon and provide more detailed advice or guidance on the policies in the Local Plan.
- 3.4 The NPPG goes on to advise that the requirements for producing SPDs are set out in Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and are addressed further in section 10 of this report.
- 3.5 It is also worth noting that the Planning & Compulsory Purchase Act 2004 (s23(1)) states:-

The local planning authority may adopt a local development document (other than a development plan document) either as originally prepared or as modified to take account of—

- (a) any representations made in relation to the document;*
- (b) any other matter they think is relevant.*

- 3.6 This enables amendments to the SPD to be made in order to address matters other than those raised in comments received through the public consultation.

Local Planning Policy

- 3.7 Appendix 1 of the draft SPD sets out the relevant local planning policies, but the following policies in particular require discussion.
- 3.8 Adopted Core Strategy Policy CS10 (see Appendix 1 to this report) allocates 1,000 dwellings south of the railway line between Westerfield Road and Henley Road, prior to 2021. This draft SPD proposes a

disposition of uses and amounts in accordance with this allocation. The SPD then proposes guidance on how the remainder of the Northern Fringe area could be developed, which accords with the draft Core Strategy Focused Review proposals.

- 3.9 Policy CS10 also says the Northern Fringe will be the main source of housing supply for the Borough after 2021, but adds that should housing delivery be falling significantly short of requirements the release of additional land will be considered earlier than 2021. In such a scenario planning applications would be difficult to resist, provided they complied with the SPD, even if the additional land was not yet allocated through the Local Plan. This is because of para 49 of the NPPF which states-

Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up to date if the LPA [local planning authority] cannot demonstrate a 5 year supply of deliverable sites

- 3.10 The Council does not currently have a five year supply of housing land. The Council's monitoring report 9 2012/13 (June 2014) identified the five year supply requirement as 4,067 dwellings against a supply of 3,729 dwellings, which included an element of development at the Northern Fringe.
- 3.11 In calculating the five year supply requirement, the National Planning Policy Framework requires an additional 5% supply to be added to the requirement plus any shortfall. The five year requirement is therefore 3,500 dwellings + 373 dwellings (shortfall: the total shortfall was 1,118 dwellings at 31st March 2013 divided by 15 years ($1,118 / 15 = 74.5$ dwellings per year $\times 5 = 373$ dwellings)) + 5%, which is 194 dwellings, which totals 4,067 dwellings.
- 3.12 Annual housing figures are recorded for the previous monitoring period (in this case 1st April 2013 to 31st March 2014) in the following June/July and it is expected these figures will show housing completions of around 200 for 2013/14 resulting in a shortfall around 1,600 dwellings.
- 3.13 The Council needs to address this shortfall and would be assisted through the release of more land within the IGS, as already identified in adopted Core Strategy policy CS10. It would also enable the appropriate infrastructure including a railway bridge and a secondary school to be comprehensively planned and delivered across the whole IGS area, in accordance with the Core Strategy and Secretary of State's views.
- 3.14 The draft Core Strategy (CS) Focused Review report to Executive on 15th October 2013, which was approved for public consultation purposes, confirmed a need for 677 dwellings per annum up to 2031.

Achieving 677 per year for 20 years is extremely challenging and this has only ever been achieved over the period 2004-2009. Also, the NPPF requires that a 5% buffer is also provided for in the five year supply. There is a need for more houses as opposed to flats. Between April 2001 and March 2013 the percentage of new homes built that were flats was 65.1% (not including student units) – 66% (including student units).

- 3.15 Therefore, the whole Northern Fringe area covered by the SPD is now identified as a strategic allocation in the CS Review Proposals (Policies) Map, for the development of up to 3,500 dwellings within the Review period. This is necessary in order to ensure a continuous supply of housing land during the plan period in accordance with the National Planning Policy Framework, along with an area identified for replacement sports facilities off Tuddenham Road (policy CS10). The draft Review Policies Map also includes the approximate disposition of land uses in the whole strategic allocation, reflective of the draft SPD proposals. Revised Policy CS10 proposed in the CS Focused Review can be viewed at Appendix 2.
- 3.16 There is no longer any national policy to prioritise brownfield sites over greenfield sites for housing development. However, Councils can set their own policies in this regard. Current Policy CS9 requires 60% of all new development up to 2027 to take place on brownfield sites; however, new policy CS9 in the Review has deleted this target percentage.

4. Options Considered / Under Consideration

- 4.1 Adopted CS policy CS10 commits IBC to the preparation of this SPD, as it is essential to ensure the proper coordinated planning of IGS supported by all necessary infrastructure.
- 4.2 Other than to progress this SPD, there would appear to be no suitable alternatives to the proper planning of IGS. This was accepted by the Secretary of State in dismissing the Mersea appeal in 2010 and the Inspector in finding the adopted Core Strategy sound in 2011.
- 4.3 The Council remains at risk of speculative piecemeal planning applications being successful without a strong development framework in place. The SPD would provide the necessary strong planning framework to resist such applications if it is considered that they do not ensure the proper planning of the locality. The interim adoption of the SPD would assist in increasing its material weight in the planning decision making process, prior to the SPD being fully adopted next year. Delays in adopting the SPD would damage efforts to secure the proper planning of the area.

- 4.4 Alternative approaches, including alternative locations, to the delivery of development of the IGS site have been evaluated and discounted by the SEA/SA.

5. Consultations

Consultation undertaken

- 5.1 An eight week period of statutory consultation was undertaken from Monday 13th January 2014 to Monday 10th March 2014. This was an extended period to take account of simultaneous consultations on the Council's Local Plan documents. Public notices and a total of 3,925 letters and emails were sent to notify residents, statutory consultees and interested parties of the consultation period and exhibition locations and dates.
- 5.2 The staffed exhibitions covered five locations: Gainsborough Sports Centre; Henley Road Sports Club; Westerfield Church; Town Hall and Colchester Road Baptist Church with a total of 518 people recorded as attending over ten days. The exhibition also covered the consultation on Core Strategy Focused Review and Site Specific Allocations proposals.

Level and type of responses received

- 5.3 Responses were received from a total of **479** different addresses and organisations. A table detailing the external consultees who commented on the application can be found in appendices 5-9.
- 5.4 Written responses to the public consultation were received in three main formats with total numbers received for each in brackets:-
1. Comment Forms (89 received) – these were produced by IBC for people to make representations, and were designed as a structured questionnaire based on the chapters of the SPD.
 2. Northern Fringe Protection Group (NFPG) consultation pro-forma (362 received) – these were produced by the NFPG and circulated to residents. It combines both Core Strategy and SPD feedback, including commentary and tick box section for individuals to express agreement with a series of statements.
 3. Individual Correspondence (76 received) – included private letters and responses from a range of residents, statutory consultees, interested parties and landowners.
- 5.5 It is important to note that more than one format of response was received from one address. Hence the totals received of each format exceeds the 479 total mentioned in paragraph 5.3 above.
- 5.6 Furthermore a letter from the Northern Fringe Protection Group is stated to be making representation on behalf of 323 people (which is a total of its 183 members and 140 other residents who have authorised the NFPG to represent them).

Summary of responses received

- 5.7 Given the volume of responses received it has been necessary to group the feedback received and summarise in tables attached as appendices to this report.
- 5.8 The following summary tables have been produced and can be viewed at the noted appendix:-
- Appendix 3: Residents summary of comments
 - Appendix 4: NFPG consultation pro forma summary
 - Appendix 5: Consultees summary of comments
 - Appendix 6: NFPG summary of comments
 - Appendix 7: Save Our Country Spaces (SOCS) summary of comments
 - Appendix 8: Other interested parties summary of comments
 - Appendix 9: IGS Landowner / Developer summary of comments
- 5.9 The purpose of the public consultation of the draft SPD was to gain feedback on its content and whether the strategies and masterplan delivered the key objectives of the Ipswich Garden Suburb vision. A very large proportion of the responses received were focused on policy matters which are not for consideration within the SPD. Issues relating to the allocation of the land for development and loss of agricultural land, are frequently raised along with concerns that brownfield sites and existing housing stock within Ipswich should be developed prior to development at IGS being commenced. These are not matters for the SPD to address but are strategic policy issues which have been considered as part of the present Core Strategy or are being considered through the Core Strategy Review.
- 5.10 As set out in the relevant policies section of this report, the IGS area has been identified as a strategic site for housing and therefore the principle that it can be developed for housing has been established. Housing need for the borough has also been reviewed and it is concluded that IGS alongside brownfield sites within Ipswich are required to fulfil the Borough's housing need and the Core Strategy Review has therefore made the necessary alterations to policy CS10 to reflect this.
- 5.11 There was disappointment expressed that the foreword is misleading since it does not reflect the Council's position expressed in the Core Strategy Review. It gives the impression that development will not take place in other locations until after 2021, which is not the Council's intention as explained in para 1.10 and chapter 7 of the SPD. In response it is noted that the foreword was written in the context of planning policy relevant at the time, although the Council does have some emerging policy which has been picked up in the SPD to ensure it is addressing the likelihood of alternative development options which may come forward in the future. The need to update the foreword is

recognised and will be undertaken as part of the interim adoption of the SPD.

- 5.12 In addition to the concerns regarding the principle of developing IGS, a number of other concerns were frequently raised. The following are some of the main concerns which were raised by respondents. This does not cover all points raised, but those issues which were frequently highlighted and require greater discussion as part of this report. A more complete summary of points is contained in the appendices.
- 5.13 The following issues are summarised along with officers responses as to how it is considered these have been addressed in the SPD or where appropriate alterations need to be made:-

Transport

- 5.14 A recurrent point which is expressed very strongly in many of the responses received is a concern with the transport impacts resulting from the proposed development and the inadequacy of the Transport Strategy set out within the SPD to deal with those impacts. Primarily there is a view that the existing road network is insufficient to deal with the extra traffic generated by the proposals and the mitigation suggested in the SPD does not go far enough. Many responses consider that substantial improvements are required and many cite the 'northern bypass' as a solution which should be in place before development commences in IGS area. For the mitigation which is outlined in the SPD, there is concern that the replacement of existing roundabouts along Valley Road with traffic lights will reduce traffic flows further and compound existing problems with traffic congestion in this area. There is also a general view expressed that the reliance on the car is underestimated and the locations of existing and future employment sources have not been factored in. The knock on effects on this to air quality and the commercial attractiveness of Ipswich as a town for future investment is considered to be detrimental as a result.
- 5.15 The strength of feeling on this matter is recognised and residents' concerns are understood. However, in identifying this site for housing Suffolk County Council as highway authority have accepted the principle of up to 5,000 homes being built at IGS without the need for any new road building subject to an appropriate sustainable transport strategy. This is set within a context of the highway authority's general strategy (Ipswich Fit for the 21st Century strategy now known as Travel Ipswich) which is to prioritise sustainable modes / achieve a modal shift and secure better management of the existing network rather than building additional road space.
- 5.16 The Transport Strategy set out in chapter 6 of the SPD sets out the measures by which sustainable modes of transport could be prioritised for IGS along with exit points which are traffic light controlled to enable traffic flows to be controlled onto the existing road networks. This along with the master plan contained in the SPD illustrates how a good range of local facilities could be provided within walkable neighbourhoods,

together with excellent cycle and walking connections within the site to maximise accessibility. These measures are among a range contained within the SPD which are considered to encourage lower car usage. Connectivity to other parts of the Borough by a variety of transport modes is necessary.

- 5.17 It is of course recognised that there will still be vehicular traffic resulting from the proposed development. However, the houses are needed and building anywhere in Ipswich will result in traffic increase. Given the scale of IGS and the comprehensive way in which it is intended to be planned through the SPD, there is an opportunity to reduce this number through the site wide measures outlined in the SPD and make improvements to sustainable modes of transport in the area such as bus and train services.
- 5.18 A detailed transport assessment is required to be submitted with future planning applications. This will give a more detailed assessment of the traffic resulting from the developments and from this a scheme of mitigation can be determined in order to ascertain the improvements/traffic calming needed to surrounding roads and junctions, cycle / pedestrian connections and increased capacity to public transport. Wherever houses are built, traffic will increase.
- 5.19 Transport effects will be considered within Environmental Impact Assessments to be submitted with planning applications.
- 5.20 In general terms it must be acknowledged that the site, in being about 1 mile away from the central area of the largest urban area in Suffolk, is within an inherently sustainable location.

Drainage / Flooding

- 5.21 Concerns have been expressed regarding the proposed drainage strategy for the site, given the nature of the clay soil and existing problems with flooding in the area. There is concern that the problem has not been fully investigated nor sufficient sensitivity factored in for more extreme weather events. Going forward, questions have been raised as to how an effective SuDS can be secured and maintained.
- 5.22 Pages 73-74 of the SPD sets out more on the SuDS strategy and identifies the preliminary work which has been undertaken and concludes that a strategy can be implemented which is effective. The preliminary SuDS strategy takes account of increases in expected peak rainfall intensity in accordance with national guidance. Details of the adoption and supervision of SuDS, will need to be submitted and approved as part of the planning application before construction can commence.
- 5.23 Concerns are also noted that the IGS SPD SuDS proposals do not appear to provide a solution that fully fits with recommendations of the IBC drainage engineer. Further information relating to the hydrology and topography of the site are also considered necessary to show how

these have informed the flood prevention and SuDS. In discussion with the IBC drainage engineer, some alteration and additional information is proposed to the SPD with regards to drainage. The preliminary SuDS strategy will also move from being a draft document to being adopted as part of the SPD (copy of this can be viewed at https://www.ipswich.gov.uk/sites/www.ipswich.gov.uk/files/Preliminary_SUDS_masterplan_ver6_.pdf). This includes topography and hydrology information for the site. The strategy has informed the basis for the content of the SPD and sets out the work upon which the future planning applications are expected to develop within their proposals. The preliminary SuDS strategy does highlight that figure 12 (location of SuDS) which is included in the present SPD draft is an indicative plan of the likely position of the strategic SuDS. This means that further detailed assessments and strategy may result in alterations to the noted size and location of the strategic SuDS, and that the development plan and areas identified as residential may need to alter as the required SuDS strategy is developed. It is already noted in the key recommendations set out in para 4.53 of the SPD, the aspects of the SuDS strategy which require further consideration, but in order to highlight the iterative nature of the SuDS strategy produced so far it is considered necessary to reiterate the indicative nature of figure 12 and that the detailed SuDS design may result in parts of the residential areas proposed in the development plan being needed to accommodate strategic areas of SuDS.

- 5.24 Drainage effects will be subject to Environmental Impact Assessments to be submitted with planning applications

Infrastructure

- 5.25 Comments were received requesting more detail on the necessary sewage infrastructure improvements be included in the SPD. The Environment Agency have also commented that the necessary upgrades and capacity issues on the matter, should be explored prior to submission of an application and that this is supported by para 162 of NPPF. At this time discussions are ongoing between Anglian Water and developers on the matter. The SPD sets out the need for a comprehensive SPD wide Infrastructure Delivery Plan to be included with any future planning application which will need to provide further detail on this issue. It is important to note that Anglian Water have not raised objections to the SPD or in that regard the infrastructure requirements set out within it.
- 5.26 The Core Strategy Review seeks to introduce flexibility on land release across the SPD area and on that basis some points have been raised regarding the effectiveness of some of the trigger points for infrastructure needing to be based on site-wide housing triggers rather than based on individual neighbourhoods. This is recognised and it is suggested that the trigger points for some items of infrastructure need to be amended accordingly.

- 5.27 Overall there is some concern related to how the necessary infrastructure will be secured. The SPD does require a detailed development sequencing and infrastructure delivery plan that covers the whole Garden Suburb, to be submitted with the future planning applications. These are expected to set out the proposed sequence delivery of the development proposed in the application and the supporting infrastructure outlined in the SPD. This will form the basis for applications to be assessed and appropriate conditions and legal agreements (under S106 of the Town and Country Planning Act 1990) to be agreed to secure the necessary infrastructure at the appropriate times. As set out in the SPD the whole process will be subject to scrutiny by a future proposed Delivery Board to be set up by the Council specifically to monitor, review and manage the successful delivery of the garden suburb. It is expected that the Delivery Board would be established after the Core Strategy Review has been adopted.
- 5.28 As shown by Table 1 in the SPD, the Council has produced a list of infrastructure and service requirements that it believes necessary to mitigate the impact of the wider development and secure the delivery of a sustainable urban extension to Ipswich. The list may continue to be refined as further information on need and local capacity issues comes to light, whilst further discussions between IBC and the various developers should help to update the trigger points for securing infrastructure or contributions thereto where appropriate.
- 5.29 Viability: Subsequent to drawing up the initial version of this list, the Council procured independent viability advice to help inform the deliverability and viability of the identified infrastructure. The appointed consultant, Peter Brett Associates (PBA), has produced a development appraisal that is considered in accordance with the National Planning Policy Framework and the latest available guidance on viability as required by the Council's brief. It is considered important to emphasise to Councillors that development viability testing is an ongoing process, and since the main body of work was carried out by PBA (April - October 2013) there have been increases in both build costs and house prices within Ipswich. As such, the position as presented by PBA can only be construed as indicative at the time of testing.
- 5.30 Affordable Housing: Notwithstanding, PBA find that the scheme is able to deliver the level of infrastructure as listed in the SPD (which although now amended remains at a similar overall cost) alongside affordable housing provision that will be low in the initial phases of development but increases to around the policy target of 35% and above towards the end of the build period. However, the exact level of affordable housing will continually be assessed throughout the phases of development in line with changes to both development costs and revenues.
- 5.31 Initial discussions on scheme viability have also taken place with one of the prospective developers of the site, Crest Nicholson, and their appointed cost consultants EC Harris. The viability model used by EC

Harris indicated that a lower amount of affordable housing could be achieved when compared to PBA's findings, although this was shown alongside the full complement of supporting infrastructure such that officers are confident that the delivery of this and affordable housing is achievable.

- 5.32 However, in order to improve scheme viability and therefore maximise the level of affordable housing that can be provided, it is considered that some of the trigger points for infrastructure delivery as previously included in the SPD (and as tested) can be moved until such a time when the development is generating more revenue, which in turn would reduce financing costs to the developers. This is particularly relevant to the initial phases of development, where development costs including site preparation and initial road junction improvements around the site would be incurred without any house sales. As such, it is recommended that the trigger point for the completion and land transfer of initial ancillary works to include the visitor facility / community centre at the Country Park be amended to the occupation of 500 dwellings in Henley Gate rather than 300, which in addition to improving scheme viability would allow for the further expansion of the neighbourhood to enable utilities and road infrastructure to connect this part of the site.
- 5.33 Following consultation with the local agents for the NHS a serviced site with contributions is now seen as the optimal solution for the delivery of a health centre, rather than a reserved site as currently specified in the draft SPD. NHS Suffolk representations have identified a deficit in primary health care capacity in the catchment area to IGS. It is therefore advised that in order to ensure new primary health care capacity is delivered for IGS residents, a site of sufficient size to meet the related health care needs is provided, along with developer contributions in order to bring forward a health centre at an appropriate point by an NHS body. It has been ascertained that based on the population arising from IGS, a 0.2ha sized site is an approximation of the area required at this stage, which would include parking, drainage and landscaping.
- 5.34 It is considered that the remaining changes to the table add clarity to what would be required, with some items now merged where appropriate, whilst there is an additional reference to the provision of on-site signage (monoliths) which was not included previously but has been indicated as a requirement in previous development viability testing.
- 5.35 Consequently, at this stage it is considered that the Council should aim to secure the infrastructure as listed in the table and at appropriate points in the development as indicatively shown, in order to suitably mitigate the impacts of the development and secure a sustainable form of development. Officers also consider that the viability evidence at this stage supports the provision of an element of affordable housing in the first phase(s) of development, and thereafter the Council should look to

secure at least the policy target subject to viability testing at the appropriate time.

- 5.36 It should also be noted that the SPD allows for developers to put forward their own triggers/infrastructure delivery plans which would be considered on their own merits having regard to the overall SPD, and all relevant considerations. Infrastructure impacts will be quantified in Environmental Impact Assessments which will have to be submitted with individual planning applications.
- 5.37 Westerfield Rail Station: More recently Network Rail have begun to present proposals as part of their operational improvements to the line, which include relocating Westerfield Railway Station to the west side of Westerfield Road. The implications for improved passenger and station facilities, together with parking facilities need to be further discussed with Network Rail, to ensure successful collaboration on the matter and maximising the transport potential of this rail facility in the context of the IGS proposals.

Design and Scale

- 5.38 Concerns have been raised that the density of the garden suburb is inappropriate for this area of Ipswich and will not be consistent with the pattern of development which adjoins the site. It is also highlighted that the density proposed and minimum garden sizes set out in the document will not result in the character envisaged for a garden suburb. In response to this it is advised that the garden sizes accord with adopted planning policy and the density is set at a level which balances the desire to make the most efficient use of this greenfield site and still enables an appropriate character to be achieved. Minimum distances between certain house elevations are advised within the SPD to ensure sufficient spacing between properties and levels of residential amenity (para 5.46). This is in part to make the most of this greenfield site in terms of meeting the housing needs of the borough, although it should be noted that this is at the lower end of the housing densities currently advised in the Council's planning policy (policy DM30). Despite being denser than adjoining areas of housing, there are still substantial areas of strategic green space which are required in the SPD, and this together with the very clear view on the garden city principles included in the SPD is considered to provide sufficient basis and does not compromise on the garden suburb character which the SPD seeks to achieve. The density proposed (35 dph net) is compliant with policy DM30.

Community Development

- 5.39 Some concerns have been raised which assert inadequate provision being made within the document for certain sectors of the community – such as older people including the elderly, ethnic minorities, teenagers as well as certain community uses being allocated within the plans such as churches. The SPD does not make reference to provision for certain community / ethnic / religious groups. It does however propose a mix of housing and community facilities which would be available to

all groups but does not identify specific community uses at this stage. Chapter 8 of the SPD sets out how community development will be established in the development and this will be the process by which future community needs are identified and accommodated.

- 5.40 Also in response to concerns raised relating to the IGS development not being very integrated with the existing town, it is noted that the SPD identifies ways in which development can integrate with the town through transport connections (eg. paras 6.10 and 6.25). Also the SPD takes account of the wider needs of Ipswich through provision of the Country Park and Visitor Centre as well as fulfilling housing need for the town. The Community Development Strategy which will need to be submitted and agreed, will set out how the new community will be established and develops links with the surrounding neighbourhoods (para 8.1).

Air Quality

- 5.41 Following on from concerns relating to traffic is the impact this will have on existing air quality within the town. Detailed assessments of air quality and necessary monitoring and mitigation will be determined at planning application stage in the Environmental Impact Assessment. These will be based on traffic modelling submitted with the planning applications.

Long Term Management / Maintenance

- 5.42 Included in some of the responses were some queries and concerns relating to the long term management and maintenance of the public open spaces and community spaces. A point is also raised in reference to any future service charge on residents not being fair if it is to be put towards provision which is open to use by other residents or should be paid for through existing council tax charges.
- 5.43 As set out in chapter 9 of the draft SPD, the exact details of how the future management and maintenance of IGS public open space and community facilities would operate does need further investigation. In line with Garden City principles the management of the public and community spaces could be undertaken by a management trust which would ensure the ongoing opportunity for local residents to play an active role in their operation and provision. Alternatively, or in addition IBC could play a positive role in the long term management of the public open spaces. This requires further investigation by the Council and progression through a future Delivery Board.
- 5.44 Whilst alternative arrangements to management and maintenance would be further explored, it is likely that the Country Park elements would remain the responsibility of the council and the funding aspects highlighted in responses would be a consideration in this option. The investigation of alternative management models does not preclude the council from having a potential option in this, and it is proposed to include some additional wording to that affect to paragraph 9.5 of the draft SPD.

5.45 In the long term it is envisaged that SuDS would be maintained by a SAB (SuDS Approving Body) which in this instance would be Suffolk County Council. The requirement for SABs and their role is to be established in future legislation which is expected to be brought in next year. In the event that this does not come in prior to consideration and determination of a planning application on IGS, interim management arrangements will need to be approved.

Loss of Biodiversity / Trees / Hedgerows

5.46 There have been in principle concerns at the impact the proposed IGS will have on these issues as well as more specific concerns on how these will be addressed in the SPD. The preparation of the SPD has been informed by a comprehensive habitat survey of the area carried out for the Council by the Suffolk Wildlife Trust. This survey identifies the main habitats of value as being the existing hedgerows, pockets of woodland, and mature trees on the site.

5.47 Ecology and Biodiversity assessments are required to be submitted with future planning applications/Environmental Impact Assessments and these will identify necessary ecology / biodiversity measures needed to maintain and enhance the value of site for wildlife. More detailed hedgerow and tree surveys are also required as part of the future planning applications and these would ascertain the arboricultural quality and extent of trees/hedgerows to be retained in the IGS area.

5.48 In terms of approach there are concerns that the SPD does not go far enough in protecting and ensuring the existing trees and hedgerows are retained in the proposed development. In particular reference has been made to the removal of one specific sentence from IBC's Vision Statement & Core Objectives "... the retention of existing on site vegetation – the retention of existing trees and hedgerows in the interest of biodiversity and in order to maintain and improve the canopy cover, which is a defining characteristic of the adjacent St Margaret's Ward" which is felt to indicate a contradiction to the sustainability principles and the garden suburb concept set out in the SPD.

5.49 It is considered that the very strong and clear green vision for IGS remains throughout the SPD. In particular the 'Character' theme for SPD vision clearly sets out the expectation that the garden suburb will be landscape dominated which includes new planting, open spaces and the retention of the best of existing hedgerows and trees for nature (para 2.17). Further details on the importance of Landscape and Open Space within IGS is included on page 54 and refers to existing trees, hedgerows and woodland forming an important landscape feature and should be used to inform the layout and landscape strategy. The design principles includes provision for retaining hedgerows and trees. The master plan is set around the existing grid of hedgerows and significant trees. Further tree/hedgerow work is required to be submitted with future planning applications, to inform layout and

biodiversity matters. The removal of the sentence highlighted in para 5.49 above, is not considered to undermine the green vision for IGS and is considered appropriate given that the outcomes of more detailed design and tree/hedgerow survey work may identify some trees / hedgerows as not being suitable for retention. Full landscape effects will be considered within Environmental Impact Assessments.

Consultees

- 5.50 Appendix 5 includes a summary table of comments received from a range of statutory consultees, parish councils, neighbouring local authorities, interest groups as well as our local design review panel (Ipswich Conservation & Design Panel). Some issues raised are already covered in the subject matters discussed above. Others, however, are specific to the respondents' field and are discussed in the following section.
- 5.51 Suffolk County Council has responded to the public consultation of the draft SPD, and has noted that most of their comments from previous consultation stages have been taken into account. However, it is noted that whilst the document contains more information, the vision and objectives could be clearer and the document should set out how the sustainability appraisal process has influenced the choice of spatial option. It is also stated that there is a role for the SPD to raise the issues of traffic and air quality, highlight the relevant policy and state how these very important aspects will be considered by the authority, as well as how they may impact design / layout of the development. The implications for traffic and air quality are recognised within the SPD. The Transport Strategy sets out the expectations in this regard and opportunities for sustainable travel. The overall layout has been set out as a consequence of trying to achieve walkable neighbourhoods and well connected developments. Further investigation into air quality and traffic impacts is required by the SPD and implications for the proposals considered.
- 5.52 There is also some concern raised with regards to the vision and core objectives, which are said to incorporate more physical and qualitative features, weakening the prominence of the objectives and suggests that those excluded from this chapter are not such a priority. Sustainable transport, is cited as an example, which is not included in the vision where priorities are established (paragraph 2.1 does not include sustainable transport as a priority). The Vision and Core Objectives for IGS are based over four themes which are considered to give emphasis to the key requirements and basis for the development of IGS which is grounded in national and local policy. Sustainable transport is specifically referenced within the connectivity theme and aspects which encourage sustainable transport is referenced in the other three themes. Paragraph 2.1 includes a list of garden city principles from a Town and Country Planning Association (TCPA) publication which are considered as a starting point for the IGS vision, which is set out in more detail in remainder of the chapter and includes sustainable transport.

- 5.53 Suffolk County Council welcomes the continued recognition of education provision. It also states that the reservation of sites for the secondary school is also reassuring and as noted in a previous response a new secondary school is needed by 2020 and the SPD should support the earlier release of this site if needed. Following further discussion on the point of reservation sites for the secondary school, in some respects it is considered that it is not reasonable or logical to require reserve sites on the two neighbourhoods (Fonnereau and Henley Gate) in addition to the preferred Red House farm site, but in accordance with latest legal advice, continued recognition will still be needed that provision of a site to accommodate a secondary school may still be required in either Fonnereau or Henley Gate in the event that the Red House site cannot be secured in the necessary time frames. Alternative purchase options could also be available if the Red House Farm site does not come forward soon enough and these should be pursued in order to secure the site. A change to the SPD to that effect is considered appropriate and has been discussed with Suffolk County Council.
- 5.54 Suffolk County Council also noted that the provision of recycling facilities within neighbourhoods (such as local centres) could be expressed more clearly than in Para 2.64, as well as the Council's requirements relating to heritage and archaeology. In response it is noted that these matters are highlighted within the SPD and the applications will still need to accord with the relevant planning policies and advice from statutory consultees at the time the planning applications are submitted. With regards to waste and recycling this is highlighted in the objectives section and is expected to be further developed through submission of strategies required in chapter 10 (waste management plans and sustainability assessment which includes topic on waste). Similarly for heritage and archaeology these are specifically noted in the SPD as a issues which need to be addressed and further detail is required through Archaeology Assessments and Heritage Statements as required in chapter 10 of the SPD.
- 5.55 Comments have been raised by residents and consultees with regards to the early provision of the Country Park, and in some comments it was highlighted it should be provided prior to the first phase of the IGS development commencing. This was a point raised in particular by Suffolk Wildlife Trust, as well as Suffolk Coastal who commented that they would support its early provision. The Country Park delivery is associated with the adjoining Henley Gate neighbourhood and on that basis the trigger for this is linked to the occupation of houses in this neighbourhood. The trigger is currently set at 300 dwellings, although it is proposed to increase this to 500 dwellings based on viability factors as set out in paragraph 5.33 of this report. It is however proposed that tree planting and landscaping details are agreed and commenced at an early stage in the development of Henley Gate which would assist with

the establishment of trees and natural landscaping by the time the Country Park is opened.

- 5.56 The Ipswich Conservation and Design Panel raised some quite specific comments relating to looking at maximising south facing dwellings and raised the concern of the sustainability measures being vulnerable to cost pressures. In this regard it is highlighted that 'Climate Change' is a key theme and core objective within the SPD and includes measures relating to code for sustainable homes, renewable energy sources and passive design measures. The Core Strategy sets the policies on the sustainability measures required and viability considerations. Achieving suitable code levels may require maximising south facing roofs where possible, but this will be assessed at a detailed stage.
- 5.57 The panel also noted that the improvements to Westerfield Station are too vague. Possible improvements are noted in the Transport Strategy included in the SPD, but the actual details related to what will be required and appropriate will need to be considered in light of detailed transport assessment results and discussion with relevant parties including Network Rail. Also on the topic of the transport implications related to the SPD, the need for an East-West bus link was noted by the panel. Again the potential for this is identified in the SPD but will need further discussion following consideration of detailed transport assessment information.
- 5.58 Suffolk Wildlife Trust noted in their comments that the recommendation of restoring the area of land around Red House Farm to parkland was not taken up in the SPD which in their opinion is regrettable. There is much included in the SPD which recognises the importance of the buildings and natural features associated with the Red House Farm site, and although the parkland would not be restored, the protection and adequate buffering of these trees, along with the hedgerows across the site, should be secured on the basis of the SPD. Requirements for future planning applications includes requirement for an Arboricultural survey and Landscape Plan, as well as a Heritage statement which is required to have particular regard to setting of Red House Farm complex. It is expected that together these documents will assess the tree and hedgerow quality and contribution to landscape setting in this particular area and set out the protection measures to retain them. The importance of these trees / hedgerows are noted in the SPD and will be expected to be addressed accordingly in any future planning applications.
- 5.59 The Church of England Diocese of St Edmundsbury & Ipswich propose that an embedded faith worker could facilitate the community development of IGS and intend to offer to manage a future community facility, possibly in partnership with other ecumenical partners. The points raised are recognised as having potential to assist the strategy for community development of IGS. For the purposes of the SPD however such details have not been specified beyond recognising that community development is an important factor and will need to be set

out in a strategy submitted with any future planning application (the draft SPD para 8.2 and Table 1 also expects a Community Development Officer to be established through planning obligations). Similarly the desire to bid for schools within IGS is noted but is not addressed in the SPD as it will be subject to later discussions once details of the schemes progress.

- 5.60 Comments sent on behalf of NHS East of England, objected to the proposal contained within the SPD, that the District Centre would deliver a 'reserved site for a health centre'. Further updated information on this aspect has been received and is contained in appendix 19. It is concluded that a serviced site with contributions is now seen as the optimal solution for the delivery of a health centre, rather than a reserved site as currently specified in the draft SPD. It is therefore advised that in order to ensure new primary health care capacity is delivered for IGS residents, a site of sufficient size to meet the related health care needs is provided, along with developer contributions in order to bring forward a health centre at an appropriate point by an NHS body. It has been ascertained that based on the population arising from IGS, a 0.2ha sized site is an approximation of the area required at this stage to accommodate 6 GPs, which would include parking, drainage and landscaping. The impact on health services will be further assessed as part of the Environmental Impact Assessments required to accompany planning applications for the site.
- 5.61 Mid Suffolk District and Babergh District Council's raised a number of points and concerns with regards to future development of the site. Many related to traffic which are mainly covered through the transport section above. Specific points were however also raised regarding the potential restricted use of the proposed railway bridge and its impact on traffic flows, as well as a request for traffic calming measures for certain roads close to the site within the Mid Suffolk boundary. On these points it is again for the outcomes of the detailed transport assessment to determine what exact mitigation is necessary for the IGS developments and surroundings. Provision is made in the SPD that traffic calming in other locations other than those specifically identified will be required and the restricted bridge is a suggestion in the transport strategy which would need to be subject to further investigation to fully understand its impacts on traffic. The traffic implications of employment sites is recognised in the SPD and would need to be explored further in the detailed transport assessment. Paragraph 6.17 identifies potential for bus routes to link main employments sites in the town which will be investigated further in the context of future transport assessments.
- 5.62 Public Health Suffolk - Suffolk County Council, commented on the SPD and for the most part the points raised are covered in the above topics. There was however specific mention of the school being located in an ASTSWF (Areas Susceptible to Surface Water Flooding) designation and concern for this decision even with the SuDS strategy. In producing the SPD the site for the secondary school has been carefully

considered in the context of the ASTSWF, the Environment Agency have not raised any concern and the inclusion of school playing fields in this area would assist with the overall drainage strategy. It is considered that the school buildings can be, subject to details, suitably located in the suggested area.

- 5.63 English Heritage comment that although the SPD identifies the listed buildings in proximity to the site, no reference is made to these designated heritage assets elsewhere in the SPD. English Heritage also make reference to the Sustainability Appraisal report which recommends changes to the core objectives in order to set out a clear commitment to conserving the setting of heritage assets and ensuring the wider historic landscape is protected and cultural heritage is taken into account. These points have been considered and it is agreed that the SPD could be improved in terms of ensuring these matters are fully considered. It is therefore proposed that an additional paragraph is added within the 'Character' theme of the vision (page 22-23) which highlights the contribution the historic and cultural heritage of the surroundings can make to establishing character within IGS and setting out an objective to conserving the setting of listed buildings and taking into consideration the wider cultural heritage of the area.
- 5.64 Sport England have raised some concern with regards to the sports provision identified and how this will meet needs, particularly where provision is to be a shared facility with schools. They have concluded that further work will need to be carried out to develop a strategy for the provision, design and delivery of all indoor and outdoor sports facilities, which they would be happy to assist on. As part of the planning applications to be submitted further detailed work building on the SPD with regards to sport facility needs and provision will be required. The strategy for sport provision can be developed in consultation with Sport England and included as part of the Infrastructure Delivery Plan.
- 5.65 Natural England whilst welcoming the inclusion of the Country Park, note that the Ipswich Core Strategy Appropriate Assessment identified the Country Park as an essential mitigation requirement to divert additional recreational pressure, associated with development, away from European sites such as the Stour and Orwell Estuaries SPA and Ramsar site, and thus avoid adverse effects on these sites. It is advised by Natural England that this basis for the Country Park requirement should be specified in the SPD and that it will be appropriately designed and managed to ensure that it will deliver the mitigation requirement identified in the Appropriate Assessment. This is agreed and it is proposed to add this wording to paragraphs 3.15 and 4.9.

IGS Developers

- 5.66 The two main developers (Crest and Mersea Homes) for the IGS site have commented on the SPD. Both have given their broad support for the SPD, whilst raising some concerns regarding certain aspects of the

draft. These are summarised in Appendix 9 alongside specific responses from IBC officers to address their points.

- 5.67 Crest raised queries over the locations of district and local centres, as well as details of the railway bridge. All have been addressed in more detail in Appendix 9. No changes are proposed as a result of the comments made in relation to the local and district centres as the locations of these have been fully considered and are logical to the wider objectives of the IGS vision. Consultant advice on retailing requirements/location was undertaken at an early stage in the SPD preparation. Greater clarity on the railway bridge being for all modes of transport is however a change which is proposed in response to the point raised by Crest.
- 5.68 One of the most significant points raised by Crest related to infrastructure delivery and viability across the IGS area. On this matter it is noted that the SPD requires an Infrastructure Delivery Plan to detail further how infrastructure will be delivered and funded between landowners / developers. The question of viability and balance of profitable uses across the SPD area is acknowledged and is intended to be addressed through the Infrastructure Delivery Plan which sets out the comprehensive delivery of required infrastructure by landowners. This fundamental matter remains to be resolved.
- 5.69 Mersea Homes raised substantially more detailed concerns in comparison to Crest, although they noted their broad support for the vision and objectives, and the principle of comprehensive planning. A fuller summary of the points raised are included in Appendix 9, many are related to a concern that the SPD is not flexible enough and some terminology is too prescriptive. There is also some concern with the terminology used and implications for adherence to certain requirements, the specific examples referenced have been reviewed and it is considered that the SPD is sufficiently flexible in its approach and does allow for individual applications, whilst ensuring that the overall standard of development is not diminished. Arguments for the exemplary requirement for sustainable development to be amended to good practice, is not agreed with and in the interests of setting a high expectation for standards the exemplary requirement will remain.
- 5.70 Some points raised have been considered and it is concluded do require some amendments to the SPD, to ensure compliance with policy and clarify expectations. These changes include a revision to paragraph 3.17 which relates to public open space within residential areas and the “requirement” that an additional 10% of land within residential areas shall be provided as public open space in addition to the open space types set out in paragraph 3.16. It is proposed to replace “requires” with “seeks”, which better reflects core strategy policy DM29. It is also agreed that more appropriate words for para 4.22 could be used to reflect the overall aim to ensure developers are expected to contribute towards strategic infrastructure as opposed to the current wording which states ‘jointly liable’.

5.71 Concerns regarding the level of detail required at certain points of the application process and the additional documents included in the planning application requirements which do not appear on the Council's validation list, have been considered however it is concluded that in both instances given the nature, complexity, scale of development and in the interests of comprehensive planning, the requirements for the level of detail is justified. Similarly the trigger points identified for the infrastructure is considered necessary to set out a framework for ensuring the necessary infrastructure to support the development is provided. The indicative nature of the triggers is noted in the supporting text and that the planning application details such as the Infrastructure Delivery Plan may indicate alternative trigger points which can be agreed with the Council.

East of England Design Panel

5.72 As part of the public consultation exercise for the draft SPD it was considered an appropriate time to have an external design review in order to independently review the SPD document and ascertain whether the approach taken is logical and robust enough to deliver the vision and objectives identified.

5.73 The external design review was undertaken by the East of England Design Panel who are managed by Design South East a not-for-profit organization. 'Design South East' is the trading name of the North Kent Architecture Centre Limited, which is a Company Limited by Guarantee. The company is governed by a voluntary board of Directors appointed openly from the public and private sectors. Details on the Directors are on www.designsoutheast.org. Design South East developed the South East Design Panel in 2002 and have managed the South East design review service since that date. Following the closure of Shape East in December 2013, Design South East formally took over the management of the East of England Panel and the delivery of design review in the East of England. Like the South East Panel, the East of England Panel is managed by Design South East, and the advice given is that of the Panel rather than Design South East.

5.74 The comments by the external design review panel have been reviewed and comments have been received from our local design review panel and Crest on their comments. The panel's full response is included at Appendix 10 and a summary of the points raised by the panel together with an IBC response are included in Appendix 11. Full minutes from the Ipswich Conservation and Design Panel are included at Appendix 15 and Crest's letter of response at Appendix 16.

5.75 In summary the external panel recognised that IGS is an ambitious project with considerable potential. It was concluded by the panel that the draft SPD is fundamentally sound in its scope and purpose, although the masterplan itself is not yet showing how the garden suburb will be anchored to the town as a whole, rather than simply

being an appendage to it. It was also suggested that it would help if the masterplan were presented more clearly, distilling and strengthening the main design moves to distinguish them from the lesser supporting elements.

- 5.76 Crest have also submitted representations in response to the panel's comments, and they advise that they concur with the view expressed by the panel that the SPD requires further refinement and joint working to achieve a robust policy context against which development proposals can be assessed and agreed. Crest conclude that a final SPD will provide a strong basis for the comprehensive delivery of the vision for the IGS and ensure the provision of key infrastructure is not compromised. This view is agreed with but until the Core Strategy Review is adopted (predicted to be October 2015), the SPD cannot be fully adopted. For that reason we are recommending the SPD for adoption as interim guidance in the intervening period.
- 5.77 With regards to the concern raised that the masterplan does not show how the garden suburb will be connected to the town, this is a clear part of the vision whereby the 'community' and 'connectivity' themes of the vision, highlight the objective to be well-integrated and being accessible to existing residents. This objective is then followed through in the remainder of the SPD document which sets out the basis for how the developments can be integrated with the town and the documents which are expected to develop these opportunities. For instance the Placemaking Strategy (figure 6 on page 49 of the SPD) identifies different edge treatments expected to address different land uses, including existing residential areas and roads within the town which adjoin IGS, the detailed design would be expected at planning application stage. The importance of IGS making connections and integrating with existing communities is highlighted in Chapter 8, which sets out the expectation that connections and integration with adjacent neighbourhoods will be considered further as part of the Community Development Strategies (see para 8.1). The design detail is also expected to make reference to existing characteristics of the housing in Ipswich (para 5.3 page 78) and the transport strategy, which is partly based on encouraging attractive links to incentivise other modes of transport to the car, which would be informed by the transport assessments to be submitted.
- 5.78 Following on from this it is concluded that there are certain aspects relating to the development of IGS which require further investigation. Some of these are recognised in the SPD such as the community development strategy in chapter 9 of the SPD, as well as design coding and details of the open space strategy.
- 5.79 It is also concluded that as a result of the points raised, that certain changes and amendments are required. These include: recognising that opportunities exist for allotments and food production areas within blocks and alongside railway lines; identifying the potential for cycle and footpath links to Westerfield Railway station; and amendments to

emphasise the rail bridge connections in order to deliver sustainable development.

Sustainability Appraisal

- 5.80 Appendix 12 of this report sets out the comments received in relation to the SA/SEA along with a joint response from Hyder and IBC officers on the points raised. Some of the concerns raised related to issues outside of the IGS site and expected more detail to be contained with the SA. On these points it is noted that the SA/SEA is a strategic assessment of the SPD and is not intended to be a detailed assessment of sustainability issues, these will come in at planning application stage through EIA. There were also concerns raised related to other data / evidence bases not being used to provide indicators. As a general note not all possible evidence can be identified here, nor is it helpful to do so. The SA/SEA has also been through a scoping stage and at that stage comments relating to indicators and evidence base were addressed and agreed. It is recognised that other evidence bases exist which could provide further results on the indicators but at this level a small range of data which is already measured and available, provides the best overview for a particular issue.
- 5.81 Hyder have advised that in their opinion the SA/SEA does not need to be revised but an addendum to the document will be produced to cover the SPD changes recommended by this report. A copy of this addendum is attached at Appendix 20 of this report.

Representations at Executive Committee by Ben Gummer MP

- 5.82 Mr Gummer provided the following statement in advance of his appearance at the Council's Executive Committee. His statement was that he:
- Welcomes Borough's determination to build houses.
 - Welcomes Borough's aspirations for the scheme.
 - Welcomes changes made to draft Masterplan.
 - Welcomes pace of Borough's process.
 - Notes that changes still need to be made to Masterplan, which is still at interim stage.
 - Notes additional improvements that could be made to make development more sustainable.
 - Notes planning application made by Mersea Homes.
 - Notes that final draft of Masterplan not yet complete.
 - Notes that there are still confusions in interim draft.
 - Asks whether recommendation that Masterplan be put to Full Council be delayed until final draft of plan be completed.
- 5.83 It was agreed at the 14th August 2014 Executive that representations submitted thereafter by Mr Gummer or other councillors would be considered and included within this report to Council. The above points are largely addressed below with the exception of the last point. In the

case of that point, the two over-arching reasons why it is recommended to proceed with the interim adoption of the masterplan are that (a) it is considered that it is of sufficient quality to be adopted; and (b) because of the submission of the current application for the majority of the Fonnereau site, the interim adoption would enable the SPD, as amended, to be a material consideration in the assessment and determination of the current application.

Representations following Executive meeting, from IBC's Conservative Group and Ben Gummer Member of Parliament for Ipswich (Appendix 21)

- 5.84 As a preface to their comments, IBC's Conservative Group and Ben Gummer MP note their support for the construction of new houses in Ipswich and support a scheme for the Northern Fringe that is of high quality and adequately served by good infrastructure, although it is highlighted that the current masterplan does not anticipate such a development.
- 5.85 A number of points raised relate to Transport, specifically Road Access; Road Infrastructure; Fonnereau Way; Cycling; Bus Services; and Position of Secondary School. In addition to this concerns were also raised with regards to Flooding & Topology; Housing Design Quality; Affordable Housing Mix; and Process. Each matter is discussed in the following paragraphs.
- 5.86 Road Access: Concerns are raised that the Masterplan envisages car traffic only accessing the new development via access points on Westerfield Road and upper end of Henley Road. The restricted number of access points is thought to lead to bottle necks on an already congested road network and also means that the new development is not sufficiently 'knitted-in' to the existing developments.

Response-Limiting the points of vehicular access is identified in the SPD as a way in which traffic impact can be more effectively managed and fed onto the existing road network by taking into account existing traffic levels on the network. The number of access points into the site are limited in terms of access for private motor vehicles but a greater number of access points are proposed for other forms of transport and will enable suitable permeability for adjoining residents to access and connect into the site. This is as required by SCC Highways.

- 5.87 Road Infrastructure: Comments are made relating to more consideration needing to be given to new road infrastructure being built prior to development taking place on this site.

Response -The SPD has been based on the view from Suffolk County Council as Highway Authority, that new road building is not necessary to accommodate the vehicles generated by the proposed housing, providing robust alternative transport modes are also developed. At this point in time there are no proposals or indication that substantial new

road infrastructure will be built. Currently we are faced with a housing need, which as a Council we have a duty to address. It is therefore not considered reasonable or appropriate for the policy position and development of the site to be delayed further in order to reconsider road infrastructure.

- 5.88 Fonnereau Way: The submitted comments note that this is a historic route and more should be made of it within the SPD so that it provides a new green walking link from Christchurch Park, through the development, straight north to the countryside beyond.

Response-The SPD highlights Fonnereau Way as a long established public footpath which forms a route between Christchurch Park and Westerfield village. Paragraph 4.7 of the SPD identifies Fonnereau Way as a part of the landscaping and green infrastructure strategy which is critical to the success of achieving a garden suburb character. As part of that it notes that the route must be enhanced. Fonnereau Way is also recognised in para 4.44 and figure 11 of the SPD as a key feature of the access and movement strategy, and as an important north-south connector. It is also highlighted as a distinguishing feature of the Fonnereau neighbourhood in chapter 5 of the SPD and is included into the street cross sections to show how the route could be enhanced and incorporated alongside new development. Overall it is considered that Fonnereau Way as an important connection has been identified, together with the requirement for its retention and enhancement, details of how this could be designed and finally a requirement within the infrastructure tables in chapter 10 for this to be undertaken.

- 5.89 Cycling: The comments state that it is found to be surprising that there is no serious consideration for new cycle 'super-highways' into the town centre. It is thought that infrastructure to make cycling easy and safe is not there and this is an opportunity to correct this. However serious consideration and detailed examination of this has not been included in the Masterplan.

Response-The fact that there is scope to improve cycling infrastructure around the town is not disputed. The SPD is very clear on the objectives for improving sustainable travel from the site to the town centre. Commentary is given on the potential routes to the town centre, but these need to be more informed by detailed transport assessments which would be undertaken at the planning application stage. Within that more informed framework, a clearer picture of cycling needs generated by the development can be concluded and the necessary mitigation i.e. connection routes can be proposed. In terms of wider cycle connections around the town this needs to be part of a broader strategy taken forward by Suffolk County Council in order to ease access around the town.

- 5.90 Bus Services: The comments highlight that bus services cannot be relied upon solely as the means of delivering a good sustainable travel

plan, and the example of Ravenswood which has had a cut in bus services is cited.

Response-The SPD sets out a range of incentives to encourage sustainable travel within the transport strategy (chapter 6 of the SPD) and does not rely solely on bus travel. Bus travel is however an important part of the strategy and the viability pressures of provision, particularly in the early phases are recognised. Hence paragraph 6.20 of the SPD and the infrastructure tables within chapter 10, identify the need for phased delivery plans of bus services, and possible subsidy and temporary services at the initial phases.

- 5.91 Position of Secondary School: The comments state that the position of the secondary school raises questions and that a more central location would be more logical in order to encourage cycling and walking. Concerns raised with present position which only has one access road serving it. Also in relocating the school it could provide a semi-green barrier to existing residents' houses. As a minimum it is requested that the impact of the school position on travel patterns is reappraised and the results published.

Response-The SPD has taken forward the position of the Secondary School on the Red House site, following an Issues and Options assessment which looked at different distributions of land uses including the Secondary School being located in each of the three neighbourhoods. This was then consulted upon and on the basis of the feedback received Option 2 which identified the Secondary School on the Red House site would form the basis of the SPD. The draft SPD was approved at Executive in November 2013 for further public consultation. It is also worth noting that the location of the Secondary School is now supported by Suffolk County Council as education authority.

The Red House site for the school was taken forward partly due to the phasing of sites and when they would come forward for development as well as accessibility. The Red House site was considered to have more certainty in terms of it being available at the time it was required for the School in comparison to the Ipswich School site. The SPD does allow for alternative sites for the Secondary School to be considered if the phasing of development sites no longer accords with when a Secondary School is required.

- 5.92 Flooding and Topology: The comments note that whilst the Council has secured its own flooding advice, there are still concerns that this potential threat to development has not been properly assessed. Independent advice has ascertained that the layout of the scheme could exacerbate flood risk, as it does not properly respect the topology of the site. It is commented that no proper or detailed topological studies appear to have been undertaken and no decent topological maps are included in the document. The independent advice taken has suggested that some re-orientation to the plans could reduce flood risk,

without jeopardising density levels and with increased amenity for residents.

Response-The SPD is based on a significant amount of background work/technical evidence which was undertaken to identify the potential options for the Masterplan and an assessment of which one was most appropriate to take forward into the SPD. This was undertaken and reported as part of the 'Issues and Options Report 2012'. This report includes an assessment of topography and other site features and context. The merits of the option eventually chosen and why, is explained on pages 12-14 of the SPD. The SPD includes reference to the background work and web links to the relevant documentation at paragraphs 1.18 and 3.4 of the SPD.

One of the recommended changes to the SPD is the inclusion of the Preliminary SuDS Strategy, which includes a contoured plan on page 5 of the strategy and shows early pre-development flood risk modelling results. The SPD includes on page 33, a constraints plan, with areas susceptible to SW flooding shown.

On the basis of this background work, open / green spaces have been generally shown in valley bottoms. Formal green areas are shown to be connected by linear spaces along the lines of field boundaries, and creates a network providing a naturally draining basis for the Sustainable Urban Drainage Masterplan. There is the potential for this to be improved and the quantity and location of green spaces may need to be looked at again in the light of detailed drainage assessments to be undertaken with the planning applications. In particular more detailed consideration needs to be given to the 'at source' SuDS design which is advised in the Preliminary SuDS Strategy and shown in the secondary and tertiary street cross sections. These smaller scale SuDS when located in line with natural contours of the site, are advocated as the most efficient way of maximising the water storage capacity. This is a level of detail which is not shown in the more strategic plans in the SPD, such as Figure 13 (the Illustrative Masterplan), but are shown in the more detailed aspects of the street cross sections and Preliminary SuDS Strategy. Overall however it is considered that the broad locations of the land uses are appropriate and have taken account of the topography of the site.

- 5.93 Housing Design Quality: It is commented that the standards set are generic, weak and will not achieve the high quality that IBC wishes to achieve. More deliberate statements on housing design quality are considered necessary which cite exceptional developments elsewhere in the UK and Europe. Accordia and Harlow Be are specifically mentioned.

Response-The SPD has established firm baselines for the creation of a Garden Suburb. These address rural edge issues as well as the placemaking qualities expected of a modern residential development. In particular, there has been an emphasis from the outset on the

conservation of existing landscape assets – primarily hedgerows and field trees – and the historic buildings on the site (Red House Farm). The SPD goes to some lengths to identify and ensure the protection of these features. In addition, a network of open space has been established which helps protect the setting of Fonnereau Way, and retains the most attractive northern edge of the site as a Country Park. There are several additional open spaces which will add to the garden suburb setting, and provision for allotments.

The concept of three ‘neighbourhoods’ underpins the urban design of the site. The SPD is clear in setting out the importance of these locations in generating distinctive layouts and built form. The emphasis on retaining field boundaries has produced a gridded street pattern and an emphasis on perimeter block design in the SPD. Between the blocks, a clear hierarchy of street types has been established (including, in the latest revision, secondary and tertiary streets). Plans and cross sections show how urban blocks will contribute to the garden suburb setting.

The SPD is not a pattern book for design – that level of detail belongs to the Design Codes which are required by the SPD at the detailed application stage. The precedents quoted - Accordia in Cambridge and New Hall, Harlow – are the product of exceptional circumstances which unfortunately do not apply to the garden suburb site – in Cambridge exceptional property values and a local housing market responsive to innovative architectural design, in Harlow a single private landowner willing to divide their site into smaller development packages and encourage high quality architectural design. Within the market and land value / ownership limitations on the Ipswich site, the SPD makes a strong case for site responsive design and the negotiation of design quality.

- 5.94 Affordable Housing Mix: It is commented that the Masterplan suggests affordable housing will be a smaller proportion at the beginning of the scheme, with the greater weight being provided towards the end. This has generated concern that it will lead to an imbalanced development, with some areas with greater numbers of social housing and others with fewer, leading to ‘ghettoisation’ of social tenants. There is also concern that not enough thought has gone into alternative models of affordable housing such as shared equity, rent-to-buy and housing association.

Response-The SPD recognises that in the light of provisions within the NPPF relating to the viability and deliverability of proposed developments, flexibility around the provision of affordable housing may be necessary to deliver a wider package of infrastructure to support a phase of development. The quality and type of affordable housing levels will be secured through each neighbourhood and phasing plans, at the planning application stage. The SPD and associated planning policies would allow for alternative affordable

housing models to be considered provided they meet identified housing needs.

- 5.95 Process: Within the comments submitted, it is also asserted that Ipswich Conservatives have made previous points which have not been incorporated such as a 'green barrier' being placed between the new build and existing housing, and alternative provision being made in the District Centre for local traders using a farmers market model.

Response -With reference to a 'green barrier' this has been incorporated within the Place Making Strategy (Figure 6 on page 49 of the SPD) which recognises that a soft landscaped area is required to address those edges where new housing adjoins existing housing. The precise detail of this landscaping will be considered in more detail at the planning application stage. Whilst, this soft landscaped edge solution may not go far enough for some to address this concern, it is a balanced approach which will provide an appropriate boundary treatment. The siting of public open space as a 'green barrier' for instance would result in public areas to the rear of housing which would represent unsatisfactory urban design whereby public open spaces are created that lack appropriate levels of surveillance and security. A balance has to be struck between integration and separation of new development.

With reference to the District Centre the requirements for this are flexible enough to allow for a range of smaller unit sizes and paragraph 3.31 of the SPD specifies that the design of the District Centre incorporates a public space which is capable of accommodating events and outdoor activities. This therefore allows for the provision of markets.

- 5.96 It is also stated that repeated representations made by Ben Gummer MP and on behalf of residents, have not been responded to and no changes have been made to the Masterplan. The MP's earlier comments on the Draft SPD were reported in the August 2014 Executive report, where it was concluded that no changes were considered appropriate or necessary as a result. It is noted that a subsequent point has been made following the Executive report, regarding the illustrative figure on page 18 of the SPD which has been amended following the Executive meeting (noted in 12.5 b) of this report).

- 5.97 Concerns were raised with regards to the consultation undertaken. It is stated that as residents' concerns about traffic, design standards and flooding have received little or no response, it is concluded that the consultation was neither thorough nor entirely genuine.

Response -On this point it is reiterated that many of the comments we received related to the 'in-principle' concerns residents have regarding the building on the Ipswich Garden Suburb area. Other matters which were frequently raised related to transport or drainage issues. On many

of these points, the role of the SPD is to set the framework which steers and guides the future development of the area. The principle of developing the northern fringe was established in 2011 through the Core Strategy. Not all the answers on drainage design and transport mitigation are available as yet, nor would it be appropriate to incorporate that level of detail within the SPD at this stage, in the absence of development details which the developers will determine. There has been a significant amount of strategic modelling and assessment undertaken to ascertain whether the area could be developed and to determine a scope for the quantum and type of development which could be accommodated. The SPD sets out the framework, from which future planning applications are expected to undertake further detailed assessment work using more informed assumptions of housing types, development sizes, delivery rates etc. The concerns residents have, have been considered and the consultation has been very useful in highlighting those matters of most concern to local residents so that we can seek to ensure they continue to be followed through and addressed during the planning application process. In addition to this, there has been significant engagement with external parties during the creation of the SPD which is detailed throughout this report, including Appendix 18 which details Atlas' support of the process undertaken. We would therefore strongly disagree that consultation was neither thorough nor entirely genuine.

- 5.98 It is also noted that with regards to presentation, the Masterplan shows a lack of thought and care that is required of a scheme of this size and explains why so many basic errors around infrastructure and design quality have been made. Two examples are given:- Misleading artist impression of lakes and a cricket pitch located on a slope.

Response-The artist impression will be amended to reflect a more typical appearance of such SuDS features. In reference to the cricket pitch this was intended as an example of the leisure and sport potential for the site. The reference to the cricket pitch could be removed from the illustrative masterplan and the area can be left as green space to be considered for other leisure/sporting uses as appropriate.

Representations following Executive meeting, from IBC's Liberal Democrat Group (Appendix 22)

- 5.99 These comments raise major concerns relating to traffic. In particular it is stated, that they do not believe that the traffic exercises carried out have been sufficiently rigorous or that the impact has been measured on the existing road network in the Borough and surrounding villages. It is also noted that the Highway Authorities' response is insufficient and shows a lack of modelling or regard to vehicular traffic movements in the north of Ipswich in the future. The long term economic and environmental impacts are expected and are considered to have been ignored. In addition to this the lay of the land appears to have been ignored in much of the planning of the site and if there is work still to be done this should not be rushed by the developer.

5.100 Response-The SPD and allocation of the site for housing, is based on SCC strategic traffic modelling, to determine the likely impacts and mitigation required for large scale housing in this location. This was considered an appropriate level of assessment for that stage of policy work. A next level of more detailed transport assessments will now be required with the planning applications, which will be more informed by the specific details proposed in the developments as well as how the necessary improvements for transport can be included in the proposed developments and how they will be funded and delivered.

5.101 In terms of the lay of the land, it is not clear in what respects this is thought to have been ignored. The Masterplan is intended to take account of existing trees and hedgerows and therefore, maintain the existing pattern of field divisions across the site. In areas susceptible to flooding, green and open spaces are shown. The SPD has been under discussion and in the process of being produced for over two years. It is a well-considered document that takes account of the site's features and sets out an ambition and basis for proposals to be taken forward. It is for these reasons that the SPD is being recommended for approval rather than developer pressure, although the submission of a planning application does highlight the need for greater weight being attributed to the SPD sooner rather than later, so that it can be effectively used in the determination process. With regards to criticism over the lack of detail, this will be forthcoming with the next stage of planning application submissions.

6. Risk Management

Risk Description	Consequence of risk	Risk Controls	Probability of risk occurring taking account of controls (scale 1-6) 1 – almost impossible 6 – very high	Impact of risk, if it occurred taking account of actions (scale 1 – negligible; 4 – catastrophic)	Actions to mitigate risk
1. Failure to adopt interim version of draft SPD with suggested changes.	Full adoption of the SPD cannot take place until around October 2015. Weight can still be attached to the draft SPD when assessing a planning application submitted prior to full adoption	IBC adoption of an SPD to guide development and infrastructure provision.	2-3	3	Interim adoption of SPD with suggested changes.

	<p>of the document. Interim adoption would formally recognise and take account of public consultation undertaken and would give the current draft SPD further weight in planning considerations. Without the SPD being given sufficient consideration and weight in determining planning applications, could result in poor Development Management of the Northern Fringe- piecemeal, poor quality development, uncoordinated infrastructure.</p>				
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7. Environmental Impact Assessment

- 7.1 The Council commissioned a sustainability appraisal (SA) of the Northern Fringe Area Development Brief Supplementary Planning Document from Hyder Consulting (UK) Limited. The SA includes Strategic Environmental Assessment (SEA) under European Directive 2001/42/EC and Environmental Assessment of Plans and Programmes Regulations 2004. The SA process has run in parallel with every stage of preparation of the SPD, to enable the SPD to respond to the SA findings. This included the SA of the Issues and Options report for the SPD, full details of which are at: http://www.ipswich.gov.uk/site/scripts/documents_info.php?categoryID=494&documentID=1518. Details of how the SPD has responded to the SA as regards transport, waste, Red House Farm, homeworking, housing mix and “secure by design” are set out in para 1.31 et seq of the SPD.

- 7.2 The Sustainability Appraisal Report and Non-Technical Summary have been fully consulted on, alongside the draft SPD. Largely positive scores are recorded for the Garden Suburb against SA objectives overall. Negative or mixed impacts recorded against some environmental objectives are acknowledged, including soil resources, the effects of traffic, effects on water resources and potential waste generation. Some of these impacts relate to the allocation of the land through policy CS10 rather than the detailed strategic development framework set out in the SPD. However, the SA process has helped to ensure that where possible the SPD includes mitigation for any potential negative effects.
- 7.3 Outline planning applications for the garden suburb will include Environmental Statements which will include detailed assessments covering the subjects listed in section 10 of the draft SPD.

8. Equalities and Diversity Implications

- 8.1 The SPD is a strategic policy document aimed at steering the quantity and nature of development coming forward in the Ipswich Garden Suburb development area. The document sets out objectives for providing a wide range of housing to cater for a variety of needs along with the community facility and services necessary to support these new residents. The exact nature of the housing provided and community facilities considered necessary to serve their needs will be established as the planning applications are submitted and more detail is provided. Accessibility within and around the development will be explored in greater detail once housing and building design is submitted. Building regulations will also have a significant role to play in securing suitable access arrangements for all new buildings. The document itself will be available electronically.

9. Financial Considerations

- 9.1 All funding to amend the existing draft SPD as agreed and to produce an interim copy of the draft SPD, would be funded from the existing Town Planning budgets.
- 9.2 Each new home completed in Ipswich results in the receipt of the Government's New Homes Bonus grant. This is paid each year for six years and is based on the amount of extra Council Tax revenue raised for new-build homes, conversions and long-term empty homes brought back into use. There is an additional payment made for the provision of affordable homes.
- 9.3 The Ipswich Garden Suburb would deliver up to 3,500 homes, which will include an element of affordable housing.
- 9.4 The Homes and Communities Agency (HCA) recently invited expressions of interest for the Large Site Infrastructure Programme.

This follows the Autumn Statement 2013 which announced that a package of support would be made available to accelerate and unlock the development of large housing sites. An expression of interest has been submitted by the Council for capacity funding to enhance the Council's resources to deal with the future planning of IGS.

10. Legal Considerations

- 10.1 The European Directive 2001/42/EC on the assessment of the effect of certain plans and programmes on the environment was implemented into national legislation by the Environmental Assessment of Plans and Programmes Regulations 2004 (the "Regulations"). The Council has undertaken an assessment as part of the sustainability appraisal and the Regulations require that consultation is carried out on the assessment in accordance with the procedure set out in the Regulations. This consultation was undertaken alongside the Ipswich Garden Suburb SPD, following consultation on a scoping report in 2012.
- 10.2 Part 2 of the Planning and Compulsory Purchase Act 2004 established the system of local development planning. Supplementary planning documents (SPD) are a category of planning documents which supplement the policies in a local plan. Unlike local plans, SPDs are not required to be submitted to independent examination.
- 10.3 The Town and Country Planning (Local Planning) (England) Regulations 2012 set out the procedure to be followed by local planning authorities in relation to the preparation of local plans and SPDs, including consultation with interested persons and bodies and the documents which must be made available at each stage.
- 10.4 SPDs are subject to one round of public consultation in Regulation 12 for a period of not less than four weeks. In the case of the Ipswich Garden Suburb SPD, following a 'call for ideas' consultation on the scope and content of the document, two rounds of public consultation have been undertaken on options in 2013 and latterly on a draft document in 2014, given the scale of the document.
- 10.5 In order to adopt the Ipswich Garden Suburb SPD a consultation statement prepared under Regulation 12(a) is required, which sets out the persons the local planning authority consulted, a summary of the main issues raised and how these issues have been addressed in the SPD. The contents of the consultation statement are included in this report and the appendices. The consultation statement will be published alongside an adoption statement in accordance with Regulations 14 and 35, at the time of interim adoption planned for September 2014.

- 10.6 Full adoption of the SPD is anticipated in late 2015 after adoption of the Council's Core Strategy Review following an Examination in Public on the latter document.
- 10.7 Counsel's advice was sought on the soundness of the changes proposed to the draft SPD. In particular, advice was sought in relation to the proposed revisions to the railway bridges, secondary school and health centre infrastructure provision. This followed concern from developers as to the legality of some of the changes being proposed to the draft SPD. Counsel advised that changes to the draft SPD would require a sufficient evidence base, which would need to be delivered through the Infrastructure Delivery Plan. Adjustments have also been made with regards to health care facilities and secondary school, in order to ensure requirements are fair and reasonable.
- 10.8 Counsel's advice identified the importance of the Infrastructure Delivery Plan to inform the appropriate trigger points for infrastructure provision. The draft SPD does highlight the indicative nature of the triggers contained in the infrastructure tables, and more informed delivery points could be agreed through the Infrastructure Delivery Plan.
- 10.9 As a result of Counsel's advice further alterations have been made to the proposed SPD changes, which are reflected in the recommendations laid out in section 12.5 of this report.

11. Performance Monitoring

- 11.1 Aim 1 of the Town Planning Operational Plan requires the SPD to be adopted in accordance with the Local Development Scheme (LDS) timetable (July 2013). This programmed the IGS SPD to be adopted by February 2014. Public consultation on a preferred option / draft document was programmed in the LDS for September and October 2013. The preparation of the SPD has taken longer than anticipated and was reported to Executive on 26th November 2013 (report E/13/60). Public consultation was undertaken between 13th January and 10th March 2014. It has also been established that the Council cannot adopt the SPD in full until after the Core Strategy Review has been examined and adopted which is predicted to be October 2015. Therefore this stage represents an interim adoption.

12. Conclusions

- 12.1 The draft SPD is considered to have made steady progress over the last few years and has involved a number of parties and consultees who have inputted into the process. The latest round of public consultation of the document has raised a number of points which have been considered and where appropriate have resulted in some further amendments to the SPD document.

- 12.2 It is evident from the responses received that there remains a significant degree of opposition to the principle of developing on this land for housing. Nevertheless it is important to reaffirm that IGS is necessary to accommodate large scale housing to meet the long-term needs of the Borough. This principle has been accepted through the adoption of policy CS10 of the Core Strategy (2011), which identifies the Northern Fringe forming the main supply of housing land after 2021, with delivery of housing on the Fonnereau neighbourhood expected before 2021. The SPD is vital to properly guide and plan the integrated development of this site, and secure the appropriate supporting infrastructure. Without the SPD in place, it reduces the ability for the council to consider and determine planning applications in the IGS. Having the SPD in place will help ensure piecemeal approaches are avoided and the overall “master plan” is accorded with, in order to deliver a well-planned, well designed sustainable garden suburb.
- 12.3 There also remains significant concern with regards to the impacts of the development and the inadequacy of the SPD to properly identify these issues and state how they will be dealt with. In this regard traffic is the most frequently and strongly argued issue, raised in responses.
- 12.4 Other aspects of significant concern relate to: drainage and flooding; infrastructure needs; quality of design and scale of development; community development; air quality; long term management and maintenance; and biodiversity, trees and hedgerows.
- 12.5 These concerns are discussed within the consultation section of the report and as a result the following changes to the SPD are therefore proposed:-
- a) Foreword by Portfolio Holder – To reflect the recommended change in status the foreword will be updated and will be clearer on some of the concerns raised in relation to the present draft. The updated foreword will cover the following points:-
- Background to the site allocation and implications of the Core Strategy Review;
 - Importance of the SPD and why it is necessary;
 - Role of ‘garden suburb’ principles and overview of what is proposed for the site
 - Features of the site and connections outside the site;
 - Consultation undertaken and main concerns received;
 - How concerns raised have sought to be addressed in the interim guidance;
 - Role of interim guidance and next steps for full adoption.
- b) Page 18 - Amend illustration to show the largest of the three blue areas (drainage ponds) as a grassed area rather than full of water.

- c) Page 23 – Insert new paragraph to reinforce the consideration of listed buildings and cultural heritage within the vision and objectives. New paragraph would read:

New paragraph 2.26

Proposals should recognise and take account of the wider historical and cultural heritage of the site. This includes identifying and taking opportunities to conserve the setting of listed buildings which are in close proximity to the site.

- d) Para 2.50, page 26 – Amend to reinforce the need for bridges in the interests of sustainability of the site and use by sustainable modes. For comparison, included below is paragraph 2.50 as currently drafted in the SPD and the proposed revised version:-

Current draft of paragraph 2.50

A new road bridge over the Ipswich to Lowestoft / Felixstowe railway line will be provided to ensure a high level of connectivity between different parts of the site. A new pedestrian / cycle bridge will replace the existing sub-standard at grade crossing where Fonnereau Way currently crosses the railway line.

Revised paragraph 2.50

In the interests of securing effective connections between all neighbourhoods and creating sustainable communities which have easy access to a full range of services and community facilities in each neighbourhood, a new road bridge over the Ipswich to Lowestoft / Felixstowe railway line will be provided to ensure a high level of connectivity between different parts of the site for various modes of transport including foot, cycle and bus. A new pedestrian / cycle bridge will replace the existing sub-standard at grade crossing where Fonnereau Way currently crosses the railway line.

- e) Para 3.3, Page 32 - In accordance with Counsel's advice, the paragraph be deleted, on the basis that it is better to leave the materiality of the draft SPD to decision making, to the Council's resolution given that this paragraph will need to be updated in the future.

Paragraph 3.3 to be deleted

The land use allocations shown in the Development Framework Plan (and associated guidance contained herein) in respect of the land allocated in the adopted Core Strategy for housing and associated facilities prior to 2021 can be regarded as firm guidance for any planning applications that may relate. Land use allocations relating to the remaining areas of the site should be regarded as guidance pending the adoption of the Core Strategy Focused Review, and indicate how these areas could be developed as part of a comprehensive plan.

- f) Para 3.12, Page 38 – In response to comments from the Parks and Open Spaces service it is advised that reference is made to the council’s Open Space and Biodiversity Policy. On that basis it is considered appropriate to add this to the ‘Public Open Space & Green Infrastructure’ section of chapter 3. The following additional wording is to be added to the second sentence of paragraph 3.12 “...**which accords with planning policy and the Council’s ‘Open Space and Biodiversity Policy’.**” The current and revised paragraphs are shown below:-

Current draft of paragraph 3.12

In keeping with the garden suburb tradition, landscape character and green open spaces will be the key defining feature of Ipswich Garden Suburb. The Council will require applicants to demonstrate high standards for the design, specification and maintenance of all landscape elements in order to secure an appropriate quality over the short, medium and long term life of the development. Landscape strategies and landscape design codes will be expected to accompany any outline planning application(s). This will apply to all landscape areas including the public realm within the built up areas.

Revised paragraph 3.12

In keeping with the garden suburb tradition, landscape character and green open spaces will be the key defining feature of Ipswich Garden Suburb. The Council will require applicants to demonstrate high standards for the design, specification and maintenance of all landscape elements in order to secure an appropriate quality over the short, medium and long term life of the development which accords with planning policy and the Council’s Open Space and Biodiversity Policy. Landscape strategies and landscape design codes will be expected to accompany any outline planning application(s). This will apply to all landscape areas including the public realm within the built up areas.

- g) Para 3.15, Page 39 – In response to comments from Natural England insert as a second sentence “**The country park is required as necessary mitigation to divert additional recreational pressure, associated with development, away from European sites such as the Stour and Orwell Estuaries SPA and Ramsar site**”. For comparison, included below is paragraph 3.15 as currently drafted in the SPD and the proposed revised version:-

Current draft of paragraph 3.15

A new country park will be a defining feature of the Ipswich Garden Suburb and an integral component of the development with a high priority attached to early delivery. The country park will also play a key role in maintaining the physical separation of Westerfield village from the built up area of Ipswich and in accommodating sustainable drainage.

Revised paragraph 3.15

A new country park will be a defining feature of the Ipswich Garden Suburb and an integral component of the development with a high priority attached to early delivery. The country park is required as necessary mitigation to divert additional recreational pressure, associated with development across the borough, away from European sites such as the Stour and Orwell Estuaries SPA and Ramsar site. The country park will also play a key role in maintaining the physical separation of Westerfield village from the built up area of Ipswich and in accommodating sustainable drainage.

- h) Para 3.17, Page 39 – In response to comments relating to this paragraph not according with policy DM29, an amendment to change the wording from “**requires**” to “**seeks**” within the first sentence is considered appropriate. For comparison, included below is paragraph 3.17 as currently drafted in the SPD and the proposed revised version.

Current draft of paragraph 3.17

In addition, the Council requires a minimum of 10% of land within the net residential areas to be provided as public open space. This space will be required to accommodate sustainable urban drainage (SuDS), retained trees and hedgerows, and to provide an attractive “garden suburb” character to each residential area. The preliminary SuDS strategy indicates that this 10% figure may need to be increased to 12% in some locations to provide sufficient space for SuDS.

Revised paragraph 3.17

In addition, the Council seeks a minimum of 10% of land within the net residential areas to be provided as public open space. This space will be required to accommodate sustainable urban drainage (SuDS), retained trees and hedgerows, and to provide an attractive “garden suburb” character to each residential area. The preliminary SuDS strategy indicates that this 10% figure may need to be increased to 12% in some locations to provide sufficient space for SuDS.

- i) Para 3.26, Page 42 – In response to comments from NHS, amend reference to ‘**A reserved site for a health centre (D1)**’ in paragraph 3.26 to ‘**A health centre (D1)**’.
- j) Para 3.43, Page 45 - states that 9ha of land should be reserved in Fonnereau and Henley Gate neighbourhoods for the secondary school in the event that a serviced site identified for the preferred location for the secondary school in the Red House neighbourhood cannot be transferred to Suffolk County Council by the required time. Further discussion on the matter of having reserved sites for the secondary school has been undertaken, and it is apparent that

there is a degree of agreement amongst parties that the Red House neighbourhood is the preferred site for the secondary school and there have been calls for the reference to reserved sites to be removed from this paragraph. However in accordance with Counsel's advice alternative sites for the secondary school, which may be required in the Fonnereau or Henley Gate neighbourhoods should still be included, in the event that the Red House site is not available when necessary. Further discussion with Suffolk County Council on the delivery of the secondary school has highlighted that this would be needed by 2021 and the lead in time for delivering the school (taking account of design, build, commission etc.) could mean that there is a need to transfer the site for the school as early as 2018 in order for the school to be operational by 2021. The need for the school will depend on delivery rates for housing which will be informed by the Infrastructure Delivery Plan. The Red House neighbourhood remains the preference in which to deliver the secondary school and it is considered appropriate for paragraph 3.43 to reference the potential that in the event that development in the Red House neighbourhood is not commenced early enough to bring forward the serviced site, alternative purchase options can be explored. The latest situation for the secondary school delivery shall be accounted for in the following changes to paragraph 3.43:-

Current draft of paragraph 3.43

Notwithstanding the above, the Council expects that 9ha of land will be reserved for a secondary school in both Fonnereau and Henley Gate neighbourhoods (sitings to be agreed with IBC and shown in any alternative Infrastructure Delivery Plan prepared and agreed by all landowners) in the event that a serviced site with access roads in Red House neighbourhood cannot be transferred to Suffolk County Council as Local Education Authority immediately following the occupation of 500 dwellings across the entire site, which may occur if the developer of Red House neighbourhood has not exercised their option agreement for the purchase of this land area by this point. To achieve a sustainable development of the Ipswich Garden Suburb a secondary school is required to commence no later than the occupation of 500 dwellings, and therefore the provision of alternative options would allow for any development in Fonnereau and/or Henley Gate to continue without the potential uncertainty of when land in Red House would be released. However, the secondary school in Red House remains the Council's strongest preference and this will be pursued in line with the Framework Plan where development has commenced in this neighbourhood prior to the occupation of 500 dwellings.

Revised paragraph 3.43

The preferred location for the secondary school is shown in figure 5 (Development Framework Plan) and is located in the Red House neighbourhood. It has been identified based on pupil forecasts from Suffolk County Council as Local Education

Authority that a secondary school will be needed by 2021 and therefore a serviced site with suitable access and drainage is required to be transferred to Suffolk County Council by 2018. The Infrastructure Delivery Plan which is to be agreed with IBC and Suffolk County Council, and prepared and agreed by all landowners, shall set out the arrangements required (such as a land transfer agreement, service provision for the site etc.) to secure delivery of the secondary school no later than 2021, unless it is demonstrated that projected delivery, phasing and other mitigation in the form of temporary accommodation suggests an alternative timetable and is agreed between developers, IBC and Suffolk County Council. In the event that the Red House site is not available at the required time, the Infrastructure Delivery Plan may need to identify the provision of a site in either the Fonnereau or Henley Gate neighbourhoods, whilst alternative purchase options will need to be explored by Suffolk County Council beyond the anticipated method of securing the site through a planning obligation. Notwithstanding the route of securing a satisfactory land transfer for the new secondary school, the arrangements for this must be in place prior to the commencement of development in IGS.

- k) Para 4.10, Page 58 – In response to comments from Natural England insert as a second sentence “**It is expected that the country park be appropriately designed and managed to deliver the necessary mitigation to divert the additional recreational pressure from other European SPA and Ramsar sites**”. For comparison, included below is paragraph 4.10 as currently drafted in the SPD and the proposed revised version.

Current draft of paragraph 4.10

Ipswich Borough Council, in consultation with relevant stakeholders, will prepare a detailed development brief for the country park prior to the commencement of its construction. It is anticipated that developers will lead on the delivery of the country park in collaboration with the Borough Council, Suffolk Coastal District Council and others. The brief will include a strategy for the delivery, use, management and maintenance of the country park. It is envisaged that the Borough Council will manage the park in perpetuity through the acquisition of the freehold.

Revised paragraph 4.10

Ipswich Borough Council, in consultation with relevant stakeholders, will prepare a detailed development brief for the country park prior to the commencement of its construction. The country park will expect to be appropriately designed and managed to help deliver the necessary mitigation to divert the additional recreational pressure of Ipswich’s growth from other European SPA and Ramsar sites. It is anticipated that developers will lead on the delivery of the country park in collaboration with the Borough Council, Suffolk Coastal District Council and others. The brief will

include a strategy for the delivery, use, management and maintenance of the country park. It is envisaged that the Borough Council will manage the park in perpetuity through the acquisition of the freehold.

- l) Para 4.22, Page 62 - Change wording in para. 4.22 (tenth bullet point) from '**jointly liable**' to '**expected**'. For comparison, included below is the tenth bullet point from paragraph 4.22 as currently drafted in the SPD and the proposed revised version.

Current draft of paragraph 4.22, tenth bullet point

In the event of there being no site-wide outline planning application and masterplan, planning applications for each neighbourhood shall incorporate a robust strategy to ensure delivery of adequate provision of sports facilities for the residents of that particular neighbourhood. Developers will be jointly liable to contribute to strategic facilities.

Revised draft of paragraph 4.22, tenth bullet point

In the event of there being no site-wide outline planning application and masterplan, planning applications for each neighbourhood shall incorporate a robust strategy to ensure delivery of adequate provision of sports facilities for the residents of that particular neighbourhood. Developers will be expected to contribute to strategic facilities.

- m) Para 4.28, Page 64 – In response to the Design Review Panel comments, additional references shall be made to food production opportunities. The Landscape & Open Space Typologies identifies two potential locations for allotments but other opportunities could be found throughout IGS and this should be reflected in para 4.28. Reference to community orchards shall also be removed. For comparison, included below is paragraph 4.28 as currently drafted in the SPD and the proposed revised version.

Current draft of paragraph 4.28

Areas for food production should be provided at several locations across the site. There are a number of ways in which this requirement can be met, and the Council anticipates a number of solutions will be provided:

- Allotments for rent by local people. Plots should be grouped together and should be enclosed using appropriate fencing and hedging; facilities should be in secure, accessible locations with good road access and parking facilities with power and water available. Two or three strategically located allotment sites will be deemed appropriate.*
- Community gardens, managed and maintained on behalf of the community, with community participation; and*

- *Community orchards. These can be planned in linear form to line recreation routes, and can accommodate a variety of native, flowering edible fruit trees.*

Revised paragraph 4.28

Areas for food production should be provided at several locations across the site. There are a number of ways in which this requirement can be met, and the Council anticipates a number of solutions will be provided in locations that are not only noted in Figure 10 but potential opportunities for the incorporation of food production areas within blocks and maximising the use of all marginal land along railway lines will be explored. Solutions to meet the areas for food production could be met in a number of forms, including:

- *Allotments for rent by local people. Plots should be grouped together and should be enclosed using appropriate fencing and hedging; facilities should be in secure, accessible locations with good road access and parking facilities with power and water available. Two or three strategically located allotment sites will be deemed appropriate; and*
- *Community gardens, managed and maintained on behalf of the community, with community participation.*

- n) Figure 11 (Access and Movement), page 71 – To address concerns relating to connections to Westerfield Rail Station, amend figure 11 to show potential cycle / footpath connections beyond site boundaries to Westerfield Rail Station. Plan included which shows additional cycle / footpath connections to Westerfield Rail Station which is included at Appendix 13.
- o) Para 4.49, Page 73 – In response to comments raised on drainage and in consultation with IBC Drainage Engineer, insert the following at end of paragraph **“The Preliminary SuDS Strategy can be viewed at Appendix 5”** and remove **“insert link to IBC SuDS Strategy when available”**.
- p) Para 4.50, Page 73 – In response to comments raised on drainage and in consultation with IBC Drainage Engineer, insert the following at the end of the second sentence **“..., including the drainage route option chosen to underpin a drainage strategy and the capacity of the SuDS provided in the residential streets”**. For comparison, included below is paragraph 4.50 as currently drafted in the SPD and the proposed revised version. The latter also includes reference to maintenance arrangements

Current draft of paragraph 4.50

Figure 12 shows only the strategic SuDS, which have been allocated to the most likely locations based on topography and engineering judgement. The final location and sizes will depend on

more detailed analysis and design. Importantly open space will be required along all the main valley bottoms.

Revised paragraph 4.50

Figure 12 shows only the strategic SuDS, which have been allocated to the most likely locations based on topography and engineering judgement. The final location and sizes will depend on more detailed analysis and design, including the drainage route option chosen to underpin a drainage strategy and the capacity of the SuDS provided in the residential streets. Importantly open space will be required along all the main valley bottoms. Until such time as the legal basis for Surface water adoption bodies is established interim arrangements for maintenance of SuDS will be agreed at the planning application stage

- q) Para 4.52, Page 73 – In response to comments raised on drainage and in consultation with IBC Drainage Engineer, insert the following line at the end of this paragraph **“In particular it should be noted that detailed SuDS design may result in encroachment into areas identified for development on the Development Framework Plan, as shown in the IBC SuDS strategy.”** So that the revised paragraph 4.52 reads as follows:-

Revised paragraph 4.52

The preliminary strategic areas for SuDS shown on Figure 12 are overlaid on the Development Framework Plan (Figure 5) in order to highlight areas where an ongoing and iterative process of masterplanning and SuDS is likely to be required to adhere to the principles of the SuDS Strategy. It should be emphasised that the design of a viable development which incorporates an adoptable SuDS network for the site may generate revisions and refinements to the land use allocations and other drawn guidance as set out in this document. In particular it should be noted that detailed SuDS design may result in encroachment into areas identified for development on the Development Framework Plan, as shown in the IBC SuDS strategy.

- r) Figure 12, Page 77 – In response to comments raised on drainage and in consultation with IBC Drainage Engineer, amend title to figure 12 to read **“Indicative Preliminary Strategic SuDS requirement”**
- s) Figure 13, Page 79 – Remove cricket pitch reference from illustrative masterplan.
- t) Page 95 – In consultation with IBC Drainage Engineer, additional street cross section to be added to show typical residential street cross section which includes key design principles together with SuDS zone.

- u) Para 5.45, Page 106 – In response to comments made, an amendment is required to clarify that any rear parking spaces are not to be included as part of garden dimensions for purposes of assessing against minimum standard sizes for gardens.

Current draft of paragraph of 5.45

Dimensions for gardens do not include any rear garden spaces.

Revised paragraph 5.45

For the purposes of considering proposed garden sizes against minimum policy requirements for rear garden sizes, any rear parking spaces should not be included as part of the rear garden dimensions.

- v) Para 6.36, Page 130 – Clarity to be added to this paragraph that managed access to the railway bridge will be subject to consideration of the detailed transport assessments to be submitted. Current and proposed paragraphs would read:-

Current draft of paragraph of 6.36

Primary vehicular access points will be provided at Westerfield Road and Henley Road. Primary access points should be connected by the internal Primary Streets and the proposed new railway bridge in order to enhance the strategic road network within north Ipswich. The new railway bridge will be designed with a facility to prevent access by private cars at certain times should the need arise in the interests of good traffic management.

Revised paragraph 6.36

Primary vehicular access points will be provided at Westerfield Road and Henley Road. Primary access points should be connected by the internal Primary Streets and the proposed new railway bridge in order to enhance the strategic road network within north Ipswich. The new railway bridge could be designed with a facility to prevent access by private cars at certain times should the need arise in the interests of good traffic management, this will be further investigated through future transport assessments and secured where appropriate.

- w) Para 7.4, Page 134 – At present this paragraph rules out the application of a Community Infrastructure Levy (CIL) or similar to fund infrastructure in the area. Work on infrastructure provision and the method by which funding responsibility is distributed between landowners is ongoing and would form part of the site-wide Infrastructure Delivery Plan to be submitted with the planning applications. It maybe that a CIL rate or similar is determined more appropriate than securing individual contributions through S106 in the event that satisfactory agreement cannot be reached between landowners. On that basis it is considered prudent for para 7.4 (page 134) to be amended to allow for this option in the future. For

comparison the current and revised drafts of paragraph 7.4 are included below:

Current draft of paragraph 7.4

The Council has commenced work on Community Infrastructure Levy (CIL) rates, which will introduce charges on new developments to fund infrastructure projects across the Borough. However, it is considered that the best option for securing infrastructure for the Garden Suburb site would be through planning conditions and a site-specific Section 106 Agreement with the landowners to ensure that their commitment of either direct delivery of or financial sums towards infrastructure that relates directly to the development site. On strategic sites such as the Ipswich Garden Suburb, an exemption from CIL rates will likely be included within the Council's Charging Schedule.

Revised paragraph 7.4

The Council has commenced work on setting its Community Infrastructure Levy (CIL) rates, which will introduce charges on new developments to fund infrastructure projects across the Borough. However, at this stage it is considered that the best option for securing infrastructure for the Garden Suburb site would be through planning conditions and a site-specific Section 106 Agreement with the landowners to ensure that their commitment of either direct delivery of or financial sums towards infrastructure relates directly to the development site. On strategic sites such as the Ipswich Garden Suburb, an exemption from CIL rates can be included within the Council's Charging Schedule. Notwithstanding the above, the Council will continually review whether CIL should be levied on part of or the entire site where it feels that the forthcoming changes to the pooling of Section 106 contributions may adversely impact upon infrastructure delivery, which could arise where multiple full/outline applications are submitted.

- x) Para 7.21, Page 138 - Additional wording required to clarify purpose of table 1. Additional wording to be added at end of Strategic Infrastructure paragraph to read “...**alongside contributions towards off-site infrastructure improvements that are considered strategic in nature.**” For comparison, the current and revised drafts of paragraph 7.21 are included below:

Current draft of paragraph 7.21

For this reason, the infrastructure required for the garden suburb development and set out below has been divided into two categories:

- **Strategic infrastructure** that may be located in a single neighbourhood but is required to mitigate the cumulative impact of and serve the whole of the Garden Suburb development (and in some cases the wider community), and therefore is likely to require

a comprehensive approach from all landowners to secure its delivery. These are listed in Table 1 below.

Revised paragraph 7.21

For this reason, the infrastructure required for the garden suburb development and set out below has been divided into two categories:

- **Strategic infrastructure** that may be located in a single neighbourhood but is required to mitigate the cumulative impact of and serve the whole of the Garden Suburb development (and in some cases the wider community), and therefore is likely to require a comprehensive approach from all landowners to secure its delivery. These are listed in Table 1 below alongside contributions towards off-site infrastructure improvements that are considered strategic in nature.

- y) Para 7.22, Page 138- additional wording to reference the need for superfast broadband being delivered

Current draft of 7.22

The lists do not include localised physical infrastructure such as secondary and tertiary streets and footpaths, bus stops and shelters, local SuDS networks, acoustic fencing, local habitat mitigation measures or section 106 and air quality monitoring which will be delivered by individual developers in accordance with a detailed planning permission for the phase to which they related

Revised paragraph 7.22

The lists do not include localised physical infrastructure such as secondary and tertiary streets and footpaths, bus stops and shelters, local SuDS networks, **superfast broadband**, acoustic fencing, local habitat mitigation measures or section 106 and air quality monitoring which will be delivered by individual developers in accordance with a detailed planning permission for the phase to which they related

- z) Para 7.25, Page 139 – Amendment to wording to third bullet point of paragraph 7.25 to replace ...”**in the interest of securing a sustainable development pattern**” with “**and consideration of what is necessary at various stages of the development in order to deliver a sustainable form of development**” in order to clarify that triggers have been considered in light of what infrastructure is needed at different stages of development. For comparison the current and revised drafts of the third bullet point from paragraph 7.25 is included below:

Current draft of paragraph 7.25, third bullet point

- the desire to create cohesive neighbourhoods in the interest of securing a sustainable development pattern;

Revised paragraph 7.25, third bullet point

- *the desire to create cohesive neighbourhoods in the interest of securing a sustainable development pattern and consideration of what is necessary at various stages of the development in order to deliver a sustainable form of development;*

aa) Infrastructure tables, chapter 7, Pages 140-146 – Amendments are proposed to both the strategic and neighbourhood infrastructure tables contained in chapter 7 of the SPD. There are three main changes to the infrastructure list and trigger points contained in Table 1:

(i) The trigger point for the completion and land transfer of initial ancillary works to include the visitor facility / community centre at the Country Park has been amended to 500 rather than 300 dwellings, which would allow for the further expansion of the neighbourhood to enable utilities and road infrastructure to connect this part of the site.

(ii) The provision of a serviced health centre site rather than securing a reserved site for this use is now required within the District Centre. This follows the consultation response from the local agents of the NHS when read alongside government guidance contained within the NPPG, which clearly establishes the link between the provision of new health infrastructure and development. It is intended that a site of approximately 0.2ha is required with phased contributions to fund delivery.

(iii) The trigger point for the transfer of a serviced site for the secondary school is removed and replaced with a requirement for arrangements to secure construction of a secondary school being in place prior to development commencing in order to meet an agreed timetable of delivery.

The other changes to the tables are considered necessary to add clarity to what would be required, with some items now merged where appropriate, and there is an additional reference to the provision of on-site signage (monoliths) which was not included previously but has been indicated as required to the prospective developers in previous discussions.

Full tracked version of the tables is contained in Appendix 14.

bb) Page 150 – Additional paragraph to state that as part of the community development strategy work the Council will seek to secure the inclusion of strategies to provide training, employment and business opportunities for local people and businesses.

New paragraph 8.4

As part of the Community Development Strategy, the Council will encourage the inclusion of strategies to provide training,

employment and business opportunities for local people and businesses.

cc) Para 9.5, Page 152 – In response to comments from Councillor Jones, an additional sentence to be added to the end of paragraph 9.5 is proposed to clarify that: ***“Notwithstanding this, the adoption and management of the open spaces by Ipswich Borough Council has not been precluded as an option for ensuring the appropriate future management and maintenance of the public open spaces within the Ipswich Garden Suburb”.***

dd) The following minor errors, spelling and corrections to be addressed:-

- Contents, page 7 - amend page reference for **“Infrastructure to Support the Growth of a Community”** to page 134.
- Page 33 – Add title to plan **“Figure 4 – Environment Site Features Plan”**
- Para 5.3, page 78 - amend references to **“Appendix B”** to **“Appendix 2”**.
- Title, page 152 - correct spelling in title.
- Para 10.4, page 154 – delete **“detailed”** from 5th line **“...be submitted as part of a detailed outline planning application...”**.
- Figure 49, page 155 – Amend Phase 1 to refer to **“Fonnereau”** and Phase 2 to **“Henley Gate”**.
- Para 7.7, line 2 – replace **“n”** with **“in”**
- Para 7.15, line 1 – replace **“.in”** with **“in”**
- Para 7.16, bullet 2, 2nd line – change **“Village”** with **“Gate”**
- Para 7.16, bullet 3, 2nd line – change **“Village”** with **“neighbourhood”**
- Para 7.19, last line – change reference to **“SCC 2014”** as this has been updated.
- Para 7.21, bullet 2, 3rd line – delete **“village or”**
- Para 7.28, 2nd line – change **“in in”** to **“in the”**
- Para 7.32 – 2nd bullet, 1st line – add **“form”** into **“...”high quality [form] of development”**...

13. Recommendations

13.1 That the Council continues its commitment to large scale development on land at Northern Fringe (Ipswich Garden Suburb) and in accordance with the Core Strategy and draft Review.

Reason: To demonstrate on-going Council support for the principle of development of the northern fringe

- 13.2 That the Northern Fringe (Ipswich Garden Suburb) development be guided and planned by the Ipswich Garden Suburb Supplementary Planning Document.**

Reason: To demonstrate ongoing Council support for the principle of development on the Northern Fringe and the importance of the Ipswich Garden Suburb Supplementary Planning Document in ensuring it is a well-planned, sustainable and comprehensive development.

- 13.3 That the Council approve as interim planning guidance the Ipswich Garden Suburb Supplementary Planning Document (and the Sustainability Appraisal incorporating Strategic Environmental Assessment) together with the Preliminary SuDS Strategy, following amendments as set out in paragraph 12.5.**

Reason: To give greater weight to the SPD as a material consideration in determining planning applications which may be submitted prior to adoption of the SPD following examination and adoption of the Core Strategy Review.

- 13.4 That the Council approves the draft supplementary planning document and Preliminary SuDS Strategy as material considerations for use in the determination of planning applications for land at the Northern Fringe (Ipswich Garden Suburb), should they be received prior to full adoption in 2015.**

Reason: To ensure any planning application is determined in accordance with the SPD.