SUFFOLK COASTAL LOCAL PLAN

EXAMINATION HEARING STATEMENT

FOR HEARING SESSION ON 4 SEPTEMBER 2019

MATTER 3 – AREA SPECIFIC STRATEGIES – DEVELOPMENT ALLOCATIONS

Prepared by Strutt & Parker on behalf of Bloor Homes Eastern

July 2019
<table>
<thead>
<tr>
<th>Site Name:</th>
<th>Land North of Humber Doucy Lane and South of Lamberts Lane, Rushmere St Andrew, Ipswich</th>
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<tr>
<td>Client Name:</td>
<td>Bloor Homes Eastern</td>
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<td>Type of Report:</td>
<td>Hearing Statement – Matter 3</td>
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<td>Date:</td>
<td>31st July 2019</td>
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1.0 Introduction

1.1 Strutt & Parker are instructed by Bloor Homes Eastern to submit this Hearing Statement to the Examination for the Suffolk Coastal Local Plan (2018-2036). Previous submissions on behalf of our clients have been made to the Suffolk Coastal District Council (now part of East Suffolk Council) throughout the emerging Local Plan process.

1.2 Bloor Homes Eastern are promoting the residential allocation of the land to the north east of Humber Doucy Lane and Lamberts Lane, Rushmere St Andrew, Ipswich. The land was referenced by the Council as Sites 1087 and 1145 in earlier Local Plan Consultation documents and was assessed in the Initial Sustainability Appraisal. A Location Plan outlining the site and Draft Masterplan accompanied our Hearing Statement for Matter 2A. The site lies to the east of the proposed allocation of land at Humber Doucy Lane in the Plan at Policy SCLP12.24, which is the subject of this Hearing Statement.

1.3 The overall site is approximately 115 hectares in size and comprises two potential residential development allocations, the first being the short-term delivery comprising of 13.5 hectares of land north east of Humber Doucy Lane; and the second comprising the remaining land which lies to the north east of Lamberts Lane. This is being promoted by Bloor Homes as a medium-term opportunity for a Garden Village development. These opportunities respond to the identified role of the Local Plan in addressing the strategic objectives for the area.

1.4 This Hearing Statement is concerned with Matter 3 of the Examination Hearing programme, and specifically addresses Point 3.27 of the Inspector’s questions for Matter 3.
2.0 Matter 3 – Communities Surrounding Ipswich

Point 3.27 - What is the justification for the allocation of land at Humber Doucy Lane coming forward beyond 2031? Is Policy SCLP12.24 developable within the plan period?

2.1 Policy SCLP12.24 states as follows:-

Policy SCLP12.24: Land at Humber Doucy Lane

9.9ha of land to the east of Humber Doucy Lane is identified to come forward for the development of approximately 150 dwellings post 2031. Development will come forward as part of a master planned approach with land in Ipswich Borough.

Development will be expected to comply with the following criteria:

a) Delivery of a high quality design incorporating a mix of housing types, including affordable housing on-site;

b) A site-specific Flood Risk Assessment will be required;

c) Provision of 0.1ha of land for an early years setting if needed within the part of the site in Suffolk Coastal District;

d) Contribution to the creation of a ‘green rim’ around Ipswich and provision of on-site open space;

e) Provision of a soft edge to the urban area through the provision of significant landscaping;

f) Promotion of the use of sustainable modes of transport; and

g) An archaeological assessment will be required.

Development will be accessed via Humber Doucy Lane. A Transport Assessment will be required to identify any necessary improvements to highways and junctions on Humber Doucy Lane and Tuddenham Road.

2.2 This Hearing Statement further supports our client’s case that the Submission Draft Plan pays insufficient regard to the strategic context of meeting the full housing need up to 2036 across the Ipswich Strategic Planning Area, the potential need for Ipswich Borough Council to consider sites beyond its administrative boundaries as part of strategic cross-boundary distribution of housing growth (as reflected in Agreement C3 of the submitted Statement of Common Ground (v4 March 2019) and the fact that a part of our client’s site falls within the Ipswich Borough Council administrative area. It should be read alongside our Hearing Statements for Matters 2A and 2C.

2.3 Policy SCLP12.24 was introduced into the Plan at a late stage, shortly before its final consultation and Submission for Examination. It has clearly been introduced because the proposals for the Ipswich Garden Suburb straddle the administrative boundary between Ipswich and East Suffolk. Indeed, this confirmed by paragraph 12.215 which states that “The site is identified to come forward post 2031 to enable the delivery of the Ipswich Garden Suburb to become well established and for
infrastructure such as the primary school associated with the Ipswich Garden Suburb to be delivered.”

2.4 This approach is piecemeal and disjointed. As noted in our Hearing Statement for Matter 2C the proposed allocation is not identified within Table 3.4 of the Plan as an element of the growth proposals for the “East of Ipswich Major Centre”, nor is it identified at any other point in the Plan as being within that Major Centre. Nevertheless, it is quite clearly part of a strategic development proposal (Ipswich Garden Suburb) to meet part of Ipswich’s growth requirements.

2.5 Our concerns regarding Policies SCLP2.1 and SCLP3.1 are equally applicable to Policy SCLP12.24, in that this policy also fails to demonstrate the Plan’s stated “close functional relationship” with Ipswich Borough.

2.6 It is our submission that, if Policy SCLP12.24 is to be justified, it should be set quite clearly in the context of being one element of the strategic cross-boundary issues (between Ipswich and East Suffolk) arising from the Plan’s strategy for growth over the period 2018-2036; in this case for the period post-2031. It should be further identified as being part of the “East of Ipswich Major Centre”.

2.7 As we have stated in our Hearing Statement for Matter 2A, the Plan should contain clearer policy guidance (within Policy SCLP2.1) on the strategic cross-boundary matters that will clearly affect the area to the north-east of Ipswich. These include the proposed “direction of travel” for the growth of Ipswich post-2031 and the proposed Ipswich Northern Route. It is clear that the Submission Draft Plan was largely prepared in advance of these considerations, and the relatively late addition into the Plan of Policy SCLP12.24 demonstrates that it has been reactive rather than proactive.

2.8 Policy SCLP12.24 is therefore just one small part of a much bigger strategic picture, and we consider that, as a minimum, the Plan should signal that land to the north-west of Rushmere St. Andrew may come forward for development in later years of the Plan period in order to address the wider strategic growth requirements of the Ipswich Strategic Planning Area.
2.9 The Plan's present stated approach (at paragraph 3.34) of intending to reconsider growth opportunities in the parts of the District neighbouring Ipswich in future revisions of the Local Plan is inadequate, if the Plan is expected to provide clear strategic policies for the whole of the Plan period, namely 2018-2036.

3. Conclusion and Proposed Change to Submission Local Plan

3.1 This Hearing Statement, specifically addressing Policy SCLP12.24 should be considered in the context of our client’s broader case that the Plan presently fails to address the strategic cross-boundary matters being considered by the Ipswich Strategic Planning Area Board. We do not consider that Policy SCLP12.24 and its supporting justification, as presently drafted, provides sufficient clarity or certainty on those matters, despite the fact that it is quite clearly proposed to be an element of meeting the potential growth requirements of Ipswich Borough post-2031.

3.2 Furthermore, Policy SCLP12.24 and its supporting justification, should be set within the context of contributing to the Plan’s proposed distribution of growth to the “East of Ipswich Major Centre” and that further land, to the north-west of Rushmere St Andrew, may come forward for development in later years of the Plan period in order to address the wider strategic growth requirements of the Ipswich Strategic Planning Area, including the proposed Ipswich Northern Route.