SCDC Local Plan - Hearing Statement

Matter 3 - Communities Surrounding Ipswich
Policy SCLP12.22 Recreation and Open Space in Rushmere

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Prepared on behalf of Ipswich Town Football Club | July 2019
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1. INTRODUCTION

1.1 This Hearing Statement is submitted by Ipswich Town Football Club (ITFC) and relates to Matter 3 Communities Surrounding Ipswich.

1.2 ITFC are actively seeking to promote, and better utilise, their land at Ipswich Town Football Club Training Ground and Academy, off Playford Road, Rushmere St Andrew (Site reference numbers 1060 and 953). A site location plan is included in Appendix 1.

1.3 Representations have previously been submitted as part of the Issues and Options Consultation, the First Draft Local Plan Consultation, and the Final Draft Local Plan Consultation, specifically in relation to ITFC’s desire to develop a high quality sports science, education and training facility at land of Playford Road.

1.4 The proposals for the site centre around working toward the creation of a world class sport and education hub, with onsite academy accommodation, and some form of enabling residential development on derelict, vacant, land, to help facilitate these improvements and achieve an elite sports environment.

1.5 Appendix 2 and 3 show ‘illustrative plans’ of how the site could be developed to see this achieved. Appendix 2 shows a combination of sport and education uses, that was submitted previously as part of our representations. Appendix 3 shows a new alternative proposal, which focuses on a training centre and academy accommodation. This approach seeks to secure and grow the future of the training ground, to create state of the art sports and science facilities. The proposals look at utilising the existing buildings on site, with reasonable extensions where necessary, to provide academy accommodation (20-25 units) on site for 16-18 year olds. It also looks to enhance the 1st team training facilities, by utilising the footprint of the existing derelict Fisons building on the east of Playford Road.

1.6 The identified derelict land is included within the area designated as “Recreation and Open Space in Rushmere” (Policy SCLP12.22). It is our view the policy is not justified by proportionate evidence, and our preference is for the derelict land to be removed from the designation. Alternatively we have suggested some amended wording in order to make the policy sound, and more fit for purpose.
2. MATTER 3 – COMMUNITIES SURROUNDING IPSWICH

Policy SCLP12.22: Recreation and Open Space in Rushmere

3.26 Is the identification of recreation and open space land under Policy SCLP12.22 justified?

2.1 It is considered the identification of recreation and open space land under Policy SCLP12.22 is not fully or properly justified. The policy relates to the previous Local Plan, and the question for the Inspector to consider should be: is this policy still relevant to be retained, and whether there is sufficient evidence or justification to support this.

2.2 It is understood that the local community seek to protect Rushmere St Andrew from the pressure of coalescence, and this policy has been included in previous Local Plans. However, in terms of this new Local Plan, the policy is not properly supported and justified by proportionate evidence.

Existing and Proposed Policies

2.3 It is also noted the proposed policy text has been amended from the existing adopted Local Plan policy SSP36, as demonstrated below with the main text changes underlined. However, there is no explanation for the amended text.

- **Current adopted Policy SSP36 – Recreation / Open Space near Rushmere Street:**

  “Land is identified near Rushmere Street as shown on the Policies Map. Much of the land is in use as sports pitches which together with some adjoining undeveloped land forms an important greenspace between Rushmere Street, the urban area of Ipswich and Kesgrave and Rushmere. The sports uses also contribute to meeting the recreational needs of this part of the district and Ipswich. Accordingly, permission will only be granted for sports ground or other associated recreational uses.”

- **Proposed Policy SCLP12.22 - Recreation and Open Space in Rushmere:**

  “Land is identified near Rushmere Street as shown on the Policies Map to retain settlement separation and natural open spaces and support biodiversity and wildlife networks. Land between Ipswich and Rushmere village, in its undeveloped form, presents an important green space between communities whilst contributing to the recreational needs of the District and Ipswich Borough. Proposals will only be granted for sports ground or other associated recreational uses.” *(our own emphasis)*
Historic and Current Use of the Land

2.4 This policy designation includes our client’s land at Ipswich Town Football Club (ITFC) off Playford Road (as identified in Appendix 1). The majority of the site is used by ITFC for their training ground and academy, and is made up of a series of playing pitches and associated buildings. This land is privately owned, and it is not accessible to the public. Furthermore, not all of this land forms part of a sport and recreation use, and it also includes vacant, derelict, brownfield land on the east of Playford Road (Aerial Image of the vacant part of the site is included in Appendix 4).

2.5 This derelict part of the land (See Photo) historically formed an area of the Fisons Sports Club with a pavilion, bowling green, and tennis court. Despite the wider site being fully utilised by ITFC, this part of the site has not been used by ITFC for over 25 years, since the club originally leased the wider site in 1993. ITFC have remained committed to investment in the club facilities, however up to this point, this part of the site was never seen as a suitable investment opportunity for the training ground or the academy. This area therefore remains empty and private, and does not fulfil any useful function at the current time. We would question whether its current state as vacant land fulfils the existing and proposed policy, or is actually beneficial to the wider community.

2.6 It therefore continues to stand in a derelict state (as shown in Appendix 4), and has been used as a ‘dumping ground’ with a partly demolished pavilion building, and unusable tennis courts. Due to the nature of the land and its proximity to existing residential dwellings, the land as a whole is incapable of forming part of a playing pitch or sport related use for the site. As a result the land has remained largely unused, and it does not form part of any public open space or make any sports provision. ITFC previously had no plans for using this area of land for training or sports purposes, therefore it has and will remain in its vacant state moving forward. However, ITFC have been considering options to enhance the current training facilities, by utilising existing buildings, and creating limited extensions to achieve a state of the art sports and science hub for both the academy and the ITFC 1st team.

Sport England

2.7 Initial discussions with Sport England have agreed the site does not provide any sport or recreation use. Indeed, alternative uses may be possible if it included improvements to better located sports facilities. This was also confirmed as part of their comments on the First Draft Local Plan, where Sport England stated (CD Reference B10, page 756) “we have indicated that we would not object to small scale loss of the non-sporting land south of Playford Road, if this enabled investment into the existing sports facilities within the remainder of the site”. This was reaffirmed by Sport England as part of their response to the Final Draft Local Plan, a copy of which is included in core document Reference A6, page 1316.
2.8 The Consultation Statement (CD Reference A10, page 760) includes reference how comments from the First Draft Local Plan consultation were taken into account in the Final Draft. In the case of policy SCLP12.22, it refers that “It is considered that the policy remains appropriate in preventing the coalescence of Ipswich and the village of Rushmere, whilst supporting continued sports use of the land. It is considered that the area as a whole meets the objective of the policy.” This is noted, however, there has been no formal assessment of the land in this policy as part of this Local Plan in order to understand whether it actually still performs the same purpose as originally intended. There is no reference to any evidence on how this view was informed. We are firmly of the view the land does not fulfil the policy requirements.

Current Policy Evidence

2.9 The proposed policy text includes reference to “…retain separation and natural open spaces and support biodiversity and wildlife networks”. We argue this is not the case. There are no ‘natural open spaces’, as the area predominantly forms part of the ITFC Training Ground and Academy. It is a maintained space used for the clubs purposes only. Therefore, there are only limited biodiversity and wildlife networks that have arisen from the vacant and derelict brownfield elements of the site.

2.10 The policy text also refers to “Land between Ipswich and Rushmere village, in its undeveloped form, presents an important green space between communities whilst contributing to the recreational needs of the District and Ipswich Borough”. Related to this, the Sustainability Appraisal (CD Reference A3, page 153) sets out that the policy protects the existing sports and recreation facilities, and limited the loss of green, undeveloped land. However, the land is not ‘undeveloped’, as described above, and it does not contribute to the recreation needs of the District, as it is not a publically accessible open space. The policy is not fully reflective of the existing uses of the land, and it is considered that the training grounds, the academy buildings, access points, and former employment social club facilities, and tennis courts, actually constitute ‘Brownfield’ land.

2.11 As a result, it is considered that some parcels of the designation could be removed, and come forward for development, whilst still retaining the settlement separation between both Ipswich and Rushmere.

2.12 There appears to be no consideration by SCDC as to the change in circumstances, in particular in terms of the derelict land, and no evidence to demonstrate the continued need for the policy designation. For these reasons, it is considered the policy is unjustified and it is not consistent with national policy.

2.13 Furthermore, there appears to be repetition with policy SCLP10.5 Settlement Coalescence, and this does not accord with the NPPF Paragraph 16(f) which states Plans should avoid unnecessary duplication of policies that apply to a particular area.
2.14 The proposals for the vacant / derelict part of the site include enabling residential development, to assist ITFC in continuing to invest in the facilities for the club and the development of the Academy. We have previously submitted a Development Brief as part of the previous representations. This demonstrated that the proposals for a state of the art sport and education hub would not materially reduce or compromise the open gap between the settlements, and therefore would retain the character and identity of the area.

2.15 We have continued to work on these proposals, and the different opportunities to provide state of the art facilities and accommodation. An alternative residential scheme, this time proposing academy related accommodation is included in Appendix 3. This would be to house academy scholars (aged 16-18) and the caretaking / pastoral / safeguarding staff of the ITFC sporting academy. This would be key for any proposals in terms of the attractiveness of the programme to scholars and their parents/guardians compared to other clubs that have on site accommodation, and is needed to protect the long term sustainability of the programme, due to the costs and distance challenges of alternative accommodation. It also promotes sustainability for the site and the surrounding area, reducing travel, and providing an elite sports environment. The alternative scheme also utilises the footprint of the existing derelict building on the east of Playford Road, to create a new 1st team building. The remainder of the vacant land forms a small area of enabling residential development to assist the investment in the facilities and the creation of the state of the art sports and science facilities.

2.16 This demonstrates how the land would enable continued enhancement of the training ground and academy, with additional investment into the sport facilities, whilst improving the important safeguarding aspect for its academy players. This would support the principle aim of continuing to provide sport and recreational opportunities to the area, that SCDC wish to see.

Alternative Wording

2.17 In light of the above comments, and given the lack of evidence base and justification for the policy, it is our preference that the derelict land in particular is removed from the designation. However, in the event the land remains covered by the Policy designation, we suggest the following amendments to make the policy sound and reflective of the current circumstances.

2.18 We suggest the following amendments for the supporting text, Paragraph 12.204:

\[12.204 \text{Within this part of the District, the pressure of settlement coalescence is seen most prominently. Some communities are separated from others by large areas of open space, sports facilities, previously developed derelict land, and countryside, whilst others blend into one another. Previous Local Plans sought to protect the open space between Ipswich and Rushmere Village through a specific policy and this is continued in this Local Plan. Land between Ipswich and Rushmere Village in this area is to be retained for sports and sports associated requirements, associated educational and academy facilities, and any associated enabling development, and recreational uses primarily which also restricts inappropriate other forms of development in this location. As identified earlier in the Plan, opportunities for}\]
expanding the ITFC Training Ground and Academy, and any education relationships will be explored and encouraged. Over the plan period, the provision of sport and sports associated educational facilities and enabling residential development on derelict land, and recreational opportunities, both public and privately accessible, will be supported and retained for the benefit of the community as well as reducing the coalescence of settlements.

2.19 We suggest the following policy wording for Policy SCLP12.22: Recreation and Open Space in Rushmere:

Land is identified near Rushmere Street as shown on the Policies Map to retain settlement separation and encourage sports facilities, natural open spaces and support biodiversity and wildlife networks. Land between Ipswich and Rushmere village, in its undeveloped form, presents an important green space between communities whilst contributing to the recreational needs of the District and Ipswich Borough. Proposals will only be granted for sports ground and sports associated requirements and educational facilities, or other associated recreational uses. Enabling development, on derelict land that would not impact on the settlement separation, will be permitted where there are clear benefits for delivering the sports and associated education facilities.’
3. CONCLUSIONS

3.1 It is considered the identification of recreation and open space land under Policy SCLP12.22 is not fully or properly justified. The policy relates to the previous Local Plan, and it is not clear that this policy is still relevant to be retained, and whether there is sufficient evidence or justification to support this.

3.2 This policy designation includes our client’s land at Ipswich Town Football Club (ITFC) off Playford Road (as identified in Appendix 1). The majority of the site is used by ITFC for their training ground and academy, and the land is privately owned, and it is not accessible to the public. It also includes vacant, derelict, brownfield land on the east of Playford Road. This does not form any part of the sports use by ITFC. We would question whether its current state fulfils the existing and proposed policy, or is actually beneficial to the wider community.

3.3 There appears to be no consideration by SCDC as to the change in circumstances, in particular in terms of the derelict land, and no evidence to demonstrate the continued need for the policy designation.

3.4 The ‘wildlife’ and ‘biodiversity networks’ referred to in the policy are questionable. What evidence supports this, and can they be maintained in private, vacant land?

3.5 It is our view the policy is not justified by proportionate evidence, and our preference is for the derelict land to be removed from the designation to enable the proposals to come forward to create a world class sports and science facilities, with on site academy accommodation and a dedicated 1st team building. Alternatively we have suggested some amended wording in order to make the policy sound, and more fit for purpose. Either way, allowing the enhancement to the existing IFTC training facilities, along with improving safeguarding care for young people, will help to secure green space, and sport and recreation facilities for future generations, as suggested by the current policy.
APPENDIX ONE – SITE PLAN
APPENDIX TWO – PLAN FROM VISION DOCUMENT
Potential area for a new state of the art joint facility for ITFC and UOS

Rearrangements of some of the training pitches whilst maintaining the specialised 3G pitch

Potential new access route to the training ground (to be confirmed)

Parking for staff and visitors

Retained access and create a new entrance

New residential development

Green buffer and tree screening
APPENDIX THREE – ALTERNATIVE PLAN
APPENDIX FOUR – AERIAL IMAGE OF THE SITE
Appendix 4 – Aerial Image of the Vacant Part of the Site

- Extend Existing Building to Create New 1st Team Building
- Goalkeeper Area to be Retained
- Possible Car Parking Area
- Derelict Area for Potential Enabling Development