Introduction

1. This short statement has been prepared by Phase 2 Planning & Development on behalf of Kesgrave Covenant in response to the Inspector’s question 3.27, and as a brief supplement to our original representation on this matter (Representation ID1170).

Background

2. The Inspector will be aware that allocation SCLP12.24 lies on the border of Suffolk Coastal District with Ipswich Borough Council. The emerging Ipswich Local Plan contains a corresponding policy relating to the adjoining land within Ipswich Borough, which it identifies as a location for future housing growth (an extract of the relevant policy, ISPA4, is attached at Appendix A to this Statement).

3. The Inspector will note that both Ipswich Policy ISPA4 and Suffolk Coastal Policy SCLP12.24 refer to development in this location occurring after 2031. In both cases there is a specific reference to current limitations on primary school capacity, but only the Suffolk Coastal version seeks to use this as a factor influencing the decision to hold development back to post 2031. In both cases however there is a more generic reference to a desire to enable the Ipswich Garden Suburb to come forward and become established first, although it is noted that in the Ipswich case, the reference suggests that this is what is “anticipated” rather than what is required.

4. Representations have and will continue to be made to the Ipswich Local Plan that the reference to 2031 in that document is equally unjustified.

5. The Ipswich Garden Suburb lies within the Ipswich Borough Council administrative area. It comprises three new neighbourhoods, known as Henley Gate, Fonnerneau, and Red House. An Outline Planning Application for the Fonnerneau neighbourhood, for 815 new homes and various other uses (including a new primary school), was submitted in 2014 under application IP/14/00638/OUTFL. An application for the Henley Gate neighbourhood, for 1,100 new homes and other uses (including a new primary school), was submitted in 2016 under application reference IP/16/00608/OUT. Both of these applications were the subject of resolutions to grant permission on 4th April 2018, subject to the completion of legal agreements. Both applications are still outstanding as the s106 agreements have not yet been concluded. The third neighbourhood, Red House (which on the basis of the adopted Ipswich Garden Suburb SPD would also provide a new primary school and a secondary school site), is not yet the subject of a planning application.

6. Included at Appendix B is an extract from the housing trajectory taken from the latest available online version of Ipswich Borough Council’s Annual Monitoring Report, which is dated April 2018. The first two rows shown refer to the two applications listed above and the third the balance of growth expected from the Ipswich Garden Suburb.

7. Clearly given the fact that the Outline permissions have not yet been granted, there will be some delay to the delivery of units compared to that projected in the March 2018 AMR, but
assuming development commences within the next few years, the Inspector will appreciate that what is expected is that the Ipswich Garden Suburb will be built out gradually over the course of around 15+ years.

**The Humber Doucy Lane Proposals**

8. In our original representation we commented on the site’s suitability for allocation, and noted that there were no significant constraints to delivery. We consider that the site has been correctly identified as being suitable and deliverable and that the Council’s evidence base supports the allocation.

9. In respect of the specific matter of primary education provision, we noted that if necessary, a primary school site could be provided as part of the development, which would serve to overcome the particular constraint identified. Clearly however the provision of three new primary schools on the Ipswich Garden Suburb could remove the need for any on-site provision.

**Question 3.27**

10. In respect of the first part of the question, the matter of primary school capacity is not a factor that dictates that the development can only occur after 2031. Rather, what is important is that the development does not come forward until either additional capacity has been created in the area by others, or that the proposed development otherwise provides appropriate mitigation in terms of delivering additional primary school capacity (which could be on-site or by the expansion of other schools in the area). The Inspector will note that the Ipswich version of the site specific policy at Appendix A simply states at criterion (a) that the development will need to provide additional primary school places to meet the need created by the development, and there is no reason why Policy SCLP12.24 should not take the same approach. Ipswich Council do not raise a lack of primary school places as a reason for deferral until after 2031.

11. There is therefore no evidence or reason to delay the development on the grounds of a lack of primary school capacity. The policy just needs to make clear additional primary school places to meet the need arising from the development should be provided.

12. In terms of the second generic statement in both Plans relating to the desire to see the Ipswich Garden Suburb substantially built first, we are not aware of any specific infrastructure constraints that would prevent development at Humber Doucy Lane occurring concurrently with the Ipswich Garden Suburb. As the Ipswich Housing Trajectory shows (see Appendix B), the Ipswich Garden Suburb will still be under construction post 2031, so there will inevitably be some overlap, and with slippage to the delivery of the Garden Suburb, that overlap will increase anyway. Both Councils clearly have no objection in principle to development occurring concurrently at Humber Doucy Lane and at the Garden Suburb, and there is no evidence to indicate that earlier development at Humber Doucy Lane would have any affect whatsoever on the delivery of the Garden Suburb.
13. Turning to the second part of the question, as currently proposed, the site would need to be developed between 2031 and 2036, with an estimated yield of around 525 homes. The Inspector will note that the housing trajectory for the Ipswich Garden Suburb is around 75-90 homes per annum (per site), which suggests a housing build period of 6-7 years for Humber Docuy Lane at a similar rate. Delaying the start of construction to 2031 would therefore make it challenging to deliver the entirety of the site (i.e. the land within both the Ipswich area and Suffolk Coastal area) by 2036.
Appendix A – Extract from draft Ipswich Local Plan – Policy ISPA4.

Policy ISPA4: Cross Boundary Working to Deliver Sites

Ipswich Borough Council will work with neighbouring authorities to master plan and deliver appropriate residential development and associated infrastructure on identified sites within the Borough but adjacent to the boundary, where cross boundary work is needed to bring forward development in a coordinated and comprehensive manner. In order to meet housing needs within the Borough boundary as far as possible, the Council identifies a broad location for future housing growth and associated infrastructure improvements at the northern end of Humber Doucy Lane adjacent to Tuddenham Road. Development here would substantially follow that at Ipswich Garden Suburb and would not start before 2031.

It could require land and infrastructure works outside Ipswich Borough in order to come forward. Development would be planned and delivered comprehensively, and would be master planned jointly with land within Suffolk Coastal District Council where this is identified through the Suffolk Coastal Local Plan. New homes would be limited to south of the railway line and adjacent to the urban area. Infrastructure requirements would include the following:

a. Primary school places to meet the need created by the development;
b. Replacement sports facilities if needed to comply with policy DM5;
c. A layout and design that incorporates a ‘green rim’ walking and cycling route around the edge of Ipswich; and
d. Transport measures including highway and junction improvements on Humber Doucy Lane and Tuddenham Road, walking and cycling infrastructure to link to key destinations including the town centre, and public transport enhancements.

8.24 One area where potential has been identified is the northern end of Humber Doucy Lane adjacent to Tuddenham Road, where land was promoted through the previous Local Plan Review and again through the call for sites process in 2017. It is identified in accordance with the National Planning Policy Framework (paragraph 67) as a broad location for future development in years 11 to 16 of the plan period. It is anticipated that development would come forward after 2031, to follow the delivery of the Ipswich Garden Suburb and enable it to become established.

8.25 Development in this broad location will be required to deliver high quality design, which sensitively addresses adjacent countryside and existing dwellings. Primary school provision in the area is close to capacity and therefore the need for additional places to be provided will be a key consideration.
## Appendix B – Ipswich Council Housing Trajectory for the Garden Suburb (From March 2018 Annual Monitoring Report)

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<thead>
<tr>
<th>Site Reference</th>
<th>Planning application ref</th>
<th>Type of permission (P</th>
<th>I</th>
<th>D) Policy ref</th>
<th>Parish/Ward</th>
<th>Name and address of site</th>
<th>Greenfield/ brownfield</th>
<th>Achievable (Yes/No)</th>
<th>Achievable in 5 years (Yes/No)</th>
<th>Site Area</th>
<th>Total number of dwellings built on site</th>
<th>Total residual number of dwellings permitted/allocated on site</th>
<th>Total number of dwellings on site which are expected to be completed by 2023-24</th>
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<th>2019/20</th>
<th>2020/21</th>
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<th>2029/30</th>
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