

CORE STRATEGY AND POLICIES REPRESENTATIONS

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Ipswich Local Development Framework January 2008

Preferred Options Consultation Comment Form

Please read carefully the notes for respondents before completing this form.

You need to clearly fill in your contact details and comments on this form and **return it so that it reaches the Council's offices at Grafton House by 5pm on the 25th February 2008**. The Council will only take into account comments received by this deadline. If your comments arrive after this time they will not be considered by the Council.

Please complete a separate form for each comment that you wish to make.

1. Contact details

Your details:

Title:	MR	Initials:	D
Surname:	BARKER		
Organisation (where relevant)	BARTON WILLMORE		
Property No./Name	ELIZABETH HOUSE		
Street Name (1)	1 HIGH STREET		
Street Name (2)			
Locality	CHESTERTON		
Town	CAMBRIDGE		
Post Code	CB4 1WB		
Tel	01223 345555	Email	

If you are an agent, details of your client:

Title:		Initials:	
Surname:			
Organisation (where relevant)	CREST NICHOLSON		
Property No./Name	CREST HOUSE		
Street Name (1)	PYRCROFT ROAD		
Street Name (2)			
Locality	CHERTSEY, SURREY		
Town			
Post Code	KT16 9GN		

2. **Your comment**

To which document does your comment relate and which part of it do you wish to comment upon?

Document: CORE STRATEGY	Page No:	
Chapter/Section: 7 VISION	Para No:	
Policy Area:	Opportunity Area:	Site Ref No:
Other: GUIDING PRINCIPLE 1		

3. **Details of your comment**

Please state here the grounds on which your representation is made and indicate clearly the changes you are seeking.

SEE ATTACHED SHEETS

1. Do you object to or support the proposal? (please tick the appropriate box)

2. What do you support/object to?

3. How would you like it changed?

4. Why?

(Please try to keep your comments concise and attach continuation sheets only if absolutely necessary)

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Ipswich Local Development Framework Core Strategy and Policies Preferred Options

Chapter 7 Vision

1. Object
2. We object to Guiding Principle 1
3. Guiding principle 1 focuses development primarily within central Ipswich on previously developed land and around the town's main district centres. This principle should be more flexible to allow the development of both greenfield sites and brownfield sites for housing to ensure housing delivery in line with regional planning policy. The Vision should be more specific in identifying areas required for greenfield development in Ipswich. Without this change Guiding Principle 1 will not be in accordance with soundness tests 4, 7 and 9.
4. Achieving the Vision is heavily reliant on previously developed land coming forward in central Ipswich. Much of this land is in flood zone 3 and the delivery of these sites is reliant on both the delivery of the Tidal Surge Barrier and the sequential and exception tests of Planning Policy Statement 25 being met on all sites within flood zones 2 and 3. Of the 44 allocated sites (3,459 potential dwellings) in the IP One area, at least 25 (2395 dwellings) are wholly or partly within the highest food zone (Flood Zone 3). The SFRA identifies that 10 of these sites have safe access issues, with four of these sites (895) dwellings having a very high residual risk of flooding even when the flood defence strategy is identified. The delivery of the Tidal Surge Barrier is by no means certain. Funding has yet to be secured, as has permission to construct the barrier, and a there is no confirmed timetable for completion of the barrier.

The delivery of many of the brownfield sites in the Site Allocations and IP- One documents is questionable for a variety of reasons including viability, land ownership constraints, Council proposed densities being too high and highway issues. The Council has not completed a Strategic Housing Land Availability Assessment only an Urban Capacity Study so has not yet properly assessed the deliverability or availability of many of the brownfield sites.

The Strategic Housing Market Assessment has not been completed and this may indicate that a concentration of housing in central Ipswich which is suitable principally for high density flats will not meet the housing requirements of Ipswich.

There is no up to date employment land study to support the allocation of employment sites in the IP-One document and the Site Allocations document. Until such as study is available the employment allocations may not be sufficient to deliver the jobs required in the Core Strategy.

For these reasons it is important that in order to meet the aims of the current Regional Spatial Strategy (RSS), the revised RSS expected in 2010, and to cope with the uncertainties of delivery of brownfield housing and the Tidal Surge Barrier that there is sufficient flexibility or the Principle will not meet test of soundness 9. Guiding Principle 1 should state that employment development will be allocated to suitable sites around the town as the Site Allocations and IP-One documents do not concentrate this in central Ipswich. Housing development should be focussed on sustainable brownfield sites, with greenfield development coming forward if brownfield sites cannot deliver the housing of the appropriate numbers or at the required rate in order to meet tests of soundness 4 and 7. In this way the Core Strategy will be flexible to cope with changing circumstances.

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Document: CORE STRATEGY	Page No:	
Chapter/Section: CHAPTER 7 THE OBJECTIVES	Para No: 7.45	
Policy Area:	Opportunity Area:	Site Ref No:
Other:		

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Ipswich Local Development Framework Core Strategy and Policies Preferred Options

Chapter 7 The Objectives Paragraph 7.45

1. Object
2. We object to the suggested approach in the Core Strategy Objectives. This approach is not realistic or deliverable and as such will not be in accordance with tests of soundness 4, 7 and 9.
3. Strategic objectives 1 and 2 are too vague to be implemented and should be more specific. Objective 3 in that it requires 90% of homes to be built on brownfield land is not deliverable. The target should be 70% to ensure that the Core Strategy is flexible enough deal with changing circumstances. Objective 4 is not deliverable. Objective 4 should not focus development primarily within IP-One.
4. Objective 1 is vague and cannot be delivered. While the aim is to be welcomed, the statement "standards of acceptability shall be raised for all developments in the town in design and sustainability terms" is not deliverable. There is no indication over what level the standards should be raised so developments cannot be assessed in respect of this objective. Objective 2 is similarly vague as it does not state what levels of carbon emissions were acceptable in 2007.

Objective 3 should not state that at least 90% of new dwellings should be provided on previously developed land. Objective 4 should not state that the development in the Borough should be focussed primarily within the central IP-One district. Much of the previously developed land is in flood zones 2 and 3 and the delivery of these sites is reliant on both the delivery of the Tidal Surge Barrier and the sequential and exception tests of Planning Policy Statement 25 being met on all sites within flood zones 2 and 3. The delivery of the Tidal Surge Barrier is by no means certain. Funding has yet to be secured, as has permission to construct the barrier, and there is no confirmed timetable for completion of the barrier. Even when the barrier is complete there will still be a number of sites (providing 895 dwellings) with a high residual risk of flooding, such as the Island Site which the Council predict will deliver 497 homes in the plan period. These sites will require the completion of Flood Risk Assessments and consultation with statutory authorities before development commences and it is possible that a proportion of such developments will not be approved.

The delivery of many of the brownfield sites in the Site Allocations and IP- One documents is questionable for a variety of reasons including viability, land ownership constraints, the Councils proposed densities being too high and highway issues.

For these reasons it is important that in order to meet the aims of the current Regional Spatial Strategy RSS, the updated RSS expected in 2010, and to have sufficient flexibility to deal with the uncertainties of delivery of brownfield housing and the Tidal Surge Barrier there is sufficient flexibility in the Vision. This objective would then meet test of soundness 9. Objectives 3 and 4 should state that employment development will be allocated to suitable sites around the town as the Site Allocations and IP-One documents do not concentrate this in central Ipswich. Housing development should be focussed on sustainable brownfield sites, with greenfield development coming forward if brownfield sites cannot deliver the housing of the appropriate numbers or at the required rate in order to meet tests of soundness 4 and 7. In this way the Core Strategy will be flexible to cope with changing circumstances.

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Document: CORE STRATEGY	Page No:	
Chapter/Section: POLICY AREA 1	Para No:	
Policy Area: 1	Opportunity Area:	Site Ref No:
Other:		

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Ipswich Local Development Framework Core Strategy and Policies Preferred Options

Policy Area 1: The Approach to Sustainable Development

1. Object
2. We support the suggested approach in that considerable weight should be placed on reducing the environmental impact of development throughout the framework. We believe the policy should seek to ensure a balanced assessment of site specific issues informs "sustainability" options. Building Regulations will require various standards for development over the plan period including ever increasing levels of development standards (assessed through the Code for Sustainable Homes, BREEAM, and other possible future mechanisms) throughout the plan period. We would suggest that the policy is reworded to achieve best practice standards for development at least in line with national targets and objectives. This should take into account those aspects assessed by current codes, but also factor locally-specific issues to ensure that the developments are truly sustainable over the long term. This should include greater consideration of the need to be adapted to the increasing effects of climate change.
3. Comprehensive redevelopment opportunities that exist on medium to larger sites within Ipswich are likely to provide greater opportunities to reduce the carbon generated over the plan period. This is due to the greater flexibility of options and potential to encourage attitudinal changes when compared to the smaller and fragmented sites which are currently proposed for the brownfield sites along the waterfront. The deliverability of this policy is questionable within many of the current preferred sites. Clearly there is a strong weighting upon carbon generation. However it seems that there has been no critical appraisal of the cost of the flood barrier which is required to ensure a number of the brownfield development proposals are viable in the long-term. Sustainable development opportunities need to ensure a balanced approach to assessing viability in the light of developing technologies and any competing objectives whilst also ensuring deliverability over the plan period. The current proposed policies are likely to impede both development and the quality of development over the plan period. The significant opportunities to alter behaviour and bring about greater sustainability on larger sites (as compared with more piecemeal development) must be taken into consideration when assessing carbon generation and other sustainable development issues.
4. The technology to deliver low carbon developments is evolving. Crest support the requirements of this policy and would be innovative in meeting it as with similar policies on other development sites. However, to aid successful implementation and delivery 'Carbon neutral' should be clearly defined in the Core Strategy (in relation to e.g. Code for Sustainable Homes and Building Greener Future definitions) so that the policy is testable and achievable. The requirement to check the carbon footprint of Ipswich to 2004 levels is supported, however the majority of the sources of carbon emissions in Ipswich will not come within the control of the planning system in the plan period. This ambition should therefore be clarified such that the contribution of new developments in achieving this aim can be quantified; the current policy wording is unclear and therefore renders its intentions impracticable.

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To which document does your comment relate and which part of it do you wish to comment upon?

Document: CORE STRATEGY	Page No:
Chapter/Section: POLICY AREA 2	Para No:
Policy Area: 2	Opportunity Area:
Other:	Site Ref No:

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Ipswich Local Development Framework Core Strategy and Policies Preferred Options

Policy Area 2: The Approach to the Location of Development

1. Object
2. We object to the lack of flexibility in the location of development. Based on the significant risks and apparent lack of implementation of various sites there should be more flexibility towards allocating developments should the approach to concentrating development in the Town Centre, the Village and the waterfront not deliver the levels of housing required in the Regional Spatial Strategy.
3. The approach to the location of development should allow for development to be undertaken in sustainable locations in the centre of Ipswich but should also allow an early release of a strategic greenfield site as the delivery of housing development from the central sites is not certain. This will ensure that the plan is the most appropriate in all circumstances in respect of tests of soundness 4 and 7 and is flexible enough to deal with changing circumstances in respect of test of soundness 9.
4. Achieving the approach set out in Policy Area 2 in respect of housing is heavily reliant on previously developed land coming forward in central Ipswich. Planning Policy Statement 3 (PPS3) in paragraph 38 requires at the local level that Local Development Documents should set out a strategy for the planned location of new housing, and goes on to say that housing should be located in areas accessible to community facilities, infrastructure and services including public transport. The greatest concentration of these services is in the centre of Ipswich, however PPS3 also requires "any physical environmental, land ownership, land-use, investment constraints or risks associated with broad locations or specific sites, such as physical access restrictions, contamination, stability, flood risk, the need to protect natural resources e.g. water and biodiversity and complex land ownership issues" should be taken into account. PPS1 Supplement on Planning and Climate Change further re-inforces the importance of ensuring that land selected for development should take into account the "known physical and environmental constraints" including flood risk with the view to ensuring a "precautionary approach" is undertaken rather than the optimistic approach identified in the Policy.

In paragraph 52 to 57 PPS3 stresses that sites should be deliverable within the plan period and sets strict criteria to assess this, such as sites to be developed within 5 years should be available, suitable, and achievable, while sites to be developed within the first 15 years should be developable, by being in a suitable location for housing development and that there should be a reasonable prospect that the site is available.

Paragraphs 62 to 64 in PPS3 headed Managing Delivery requires a housing implementation strategy that should include contingency planning to identify different delivery options in the event that actual housing delivery does not occur at the rate expected.

The Council has not completed a Strategic Housing Land Availability Assessment as required by PPS3, only an Urban Capacity Study so has not properly assessed the deliverability or availability of many of the brownfield sites. Until this is complete the strategy for the location of development does not have an adequate evidence base. It is important that the Council supports their view of the delivery of housing with a housing trajectory. This will demonstrate how sites will be phased and can be used to assess when alternative development scenarios are required to deliver housing. Until PPS3 is

more strictly followed the plan will fail test of soundness 4, as it will not be consistent with national planning policy.

The delivery of housing in central Ipswich is likely to be delayed as much of this land is in flood zones 2 and 3 and the delivery of these sites is reliant on both the delivery of the Tidal Surge Barrier and the sequential and exception tests of Planning Policy Statement 25 being met on all sites within flood zones 2 and 3. The delivery of the Tidal Surge Barrier is by no means certain. Funding has yet to be secured, as has permission to construct the barrier, and there is no confirmed timetable for completion of the barrier. Even when the barrier is complete there will still be a number of sites (providing 895 dwellings) with a high residual risk of flooding, such as the Island Site which the Council predict will deliver 497 homes in the plan period. These sites will require the completion of Flood Risk Assessments and consultation with statutory authorities before development commences and it is possible that a proportion of such developments will not be approved.

The delivery of many of the brownfield sites in the Site Allocations and IP- One documents is questionable for a variety of reasons including viability, land ownership constraints, proposed densities being too high and highway issues. The Council has not completed a Strategic Housing Land Availability Assessment only an Urban Capacity Study so has not yet properly assessed the deliverability or availability of many of the brownfield sites.

The Strategic Housing Market Assessment has not been completed and this may indicate that a concentration of housing in central Ipswich which is suitable principally for high density flats will not meet the housing requirements of Ipswich.

There is no up to date employment land study to support the allocation of employment sites in the IP-One document and the Site Allocations document. Until such a study is available the employment allocations may not be sufficient to deliver jobs required in the Core Strategy.

For these reasons it is important that in order to meet the aims of the current Regional Spatial Strategy (RSS), the updated RSS expected in 2010, and to have sufficient flexibility to deal with the uncertainties of delivery of brownfield housing and the Tidal Surge Barrier that there is sufficient flexibility in Policy Area 2. Without this flexibility or proper analysis of the proposals the policy will fail to meet tests of soundness 4, 7 and 9. Policy Area 2 should state that employment development will be allocated to suitable sites around the town as the Site Allocations and IP-One documents do not concentrate this in central Ipswich. Housing development should be focussed on sustainable brownfield sites, with greenfield development coming forward if brownfield sites cannot deliver the housing of the appropriate numbers or at the required rate. In this way the Core Strategy will be flexible to cope with changing circumstances.

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2. **Your comment**

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Document: CORE STRATEGY		Page No:
Chapter/Section: POLICY AREAS		Para No:
Policy Area: 3	Opportunity Area:	Site Ref No:
Other:		

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Ipswich Local Development Framework Core Strategy and Policies Preferred Options

Policy Area 3: The Approach to Mixed Use Development

1. Object
2. We object to the inflexible approach to this policy.
3. We propose that the policy should state that major developments will be expected to comprise a mix of uses unless this can be justified by planning policy.
4. The policy proposes a three tier approach to creating mixed use developments. As every site, location and the surrounding mix of uses are unique we consider that any approach that seeks to prescribe general land use mixes is unnecessary and the appropriate mix should be worked out on a site by site basis. Without this flexibility the policy will fail test of soundness 9.

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Policy Area: 4	Opportunity Area:	Site Ref No:
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Policy Area 4: The Approach to Protecting Our Assets

1. Support
2. We support the need to protect important historic and ecological assets.
3. N/A
4. N/A

2. **Your comment**

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Chapter/Section:		Para No:
Policy Area: 6	Opportunity Area:	Site Ref No:
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Policy Area 6: The Ipswich Policy Area

1. Object
2. We object to the lack of joint working between the authorities.
3. Joint working between the authorities should not be ignored as proposed in the suggested approach.
4. Planning Policy Statement 3 and the Draft Regional Spatial Strategy promote the need for joint working particularly where it is necessary to deliver sub regional objectives. Without recognising this, the policy will fail test of soundness 4 as the policy will not be consistent with national or regional policy, and test 6 that the policies are consistent with policies prepared by neighbouring authorities.

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Property No./Name CREST HOUSE	
Street Name (1) PYRCREFT ROAD	
Street Name (2)	
Locality	
Town CHERTSEY, SURREY	
Post Code KT16 9GN	

2. **Your comment**

To which document does your comment relate and which part of it do you wish to comment upon?

Document: CORE STRATEGY	Page No:	
Chapter/Section:	Para No:	
Policy Area: 7	Opportunity Area:	Site Ref No:
Other:		

3. **Details of your comment**

Please state here the grounds on which your representation is made and indicate clearly the changes you are seeking

SEE ATTACHED SHEETS

1. Do you object to or support the proposal? (please tick the appropriate box)

2. What do you support/object to?

3. How would you like it changed?

4. Why?

(Please try to keep your comments concise and attach continuation sheets only if absolutely necessary)

The next stage in the plan preparation process is called the submission stage. At that stage we will consult the public on the full draft document. We will notify all those who complete this form at that stage. Please specify if you would like to be contacted by email or by letter

If you do not wish to be notified at submission stage, please tick here

Thank you for your time.

Ipswich Local Development Framework Core Strategy and Policies Preferred Options

Policy Area 7: The Amount of Housing Required

1. Object
2. We object to the calculations of the number of units needed on new site allocations. We object that the policy does not plan for a period of 15 years.
3. Table 2 should be changed to (the changed wording is underlined):

		Discounted Numbers	Cumulative Numbers
1	Units completed between 2001 and 2007	3686	3686
2	Units under construction	1109	4977
3	Units with <u>planning permission</u>	3685	<u>3316</u>
4	Units with a resolution to grant planning permission (subject to the prior completion of a Section 106 agreement)	720	<u>648</u>
5	Predicted re-use of vacant residential units (2007 to 2021)	<u>0</u>	<u>8941</u>
6	Number of units needed on new site allocations to 2021	<u>6459</u>	15400
7	Number of homes required to meet the RSS 14 targets between 2021 and 2025	<u>4170 at 834 dwellings per annum</u>	<u>4170</u>
8	Total number of units needed on new site allocations to 2021	<u>10,629</u>	19570

4. The Council state that in lines three and four that 5% of units with planning permission or a resolution to grant are not likely to be completed are based on past experience. The Ipswich Local Plan November 2007 in Table 1 in the Housing chapter assumed that 10% of unimplemented planning permissions and planning applications likely to be approved would not come forward. The Ipswich Local Plan First Deposit Draft November 2001 made the same assumptions. No clear evidence has been put forward by the Council to alter the 10% discount which should be reinstated and we consider that the policy as a result fails test of soundness 7.

Line 5 makes an allowance for the predicted re-use of residential units at 250 units. This should be deleted as vacant units are a fact in any housing market. The planning system does not have control over the reuse vacant units so there is no certainty that the 250 units will be delivered. Therefore to ensure that the housing requirements in the Regional Spatial Strategy are met this allowance should be removed as we consider that the policy as a result fails test of soundness 7.

The secretary of States Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England and Statement of Reasons (RSS) set out in policy H1 that Local development documents should assume that annual average rates provision in the early years after 2021 will be the same as for 2006 to 2021. Taking into account the need to make up a shortfall of 967 homes accumulated between 2001 and 2006 the annual average rate of housing delivery required between 2006 and 2021 is 834