

Cabinet

Report Title:	Ipswich Garden Suburb – Formal Response to Henley Gate, North Ipswich, Planning Application
Meeting Date:	18 October 2016
Lead Councillor(s):	Councillor Matthew Hicks, Cabinet Member for Environment and Public Protection
Local Councillor(s):	Councillors Sarah Adams and Inga Lockington, Kathy Bole and James Crossley, Sandra Gage and Robin Vickery
Director:	Geoff Dobson, Director for Resource Management
Assistant Director or Head of Service:	Sue Roper, Assistant Director, Strategic Development
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Brief summary of report

1. The development of the Ipswich Garden Suburb (formerly known as the Northern Fringe) has been considered previously by Cabinet. This report considers an outline planning application for one part of the Ipswich Garden Suburb for 1,100 homes. A present, there are deficiencies in the evidence that has been submitted with the application.
2. There are significant issues that need to be addressed before Suffolk County Council (as the highway, lead local flood and education authority) can support the application.
3. Whilst the outstanding issues are likely to be addressed, Cabinet authorisation is needed to seek to resolve these matters so that the county council can respond to Ipswich Borough Council in a timely manner.

What is Cabinet being asked to decide?

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| <ol style="list-style-type: none"> 4. Notify Ipswich Borough Council that, owing to inadequate evidence, particularly transport and drainage, and a lack of a clear strategy to deliver strategic infrastructure such as the bridges and the secondary school, Suffolk County Council cannot support the outline planning application at this time and, therefore, the Borough Council should not determine the application based on current evidence. 5. Delegate to and authorise the Assistant Director for Strategic Development, in consultation with the Cabinet Member for Environment and Public Protection and the Cabinet Member for Highways and Transport, to: maintain ongoing negotiations between Ipswich Borough Council, developers and landowners to resolve current concerns; provide detailed comment on other matters, and to determine whether or not a package of mitigation measures can be agreed. |
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Reason for recommendation

6. Land to the north of Ipswich, known as the northern fringe, is allocated for new homes in the borough council's adopted (2011) Core Strategy and Policies document "the Core Strategy".
7. This report reviews the transport, drainage and education considerations and the need for the strategic infrastructure to come forward for the whole development. These are significant issues that will need to be addressed before Suffolk County Council can support the application.
8. This is the second application for the wider Ipswich Garden Suburb (IGS) but the first (land to the west of Westerfield Road - application reference 14/00638/OUTFL) has not yet been determined. Therefore, this remains a critical first stage in implementing Ipswich Borough Council's Core Strategy.

What are the key issues to consider?

9. For the service areas which are the responsibility of the county council, there are deficiencies in the evidence that has been submitted. There are uncertainties as to the delivery of the strategic infrastructure necessary for the northern fringe to come forward. These are concerns that will need to be addressed before Suffolk County Council can support the application.

What are the resource and risk implications?

10. If Suffolk County Council were not to raise these concerns, there is a risk to the delivery of services, the function of the highway network, sustainable drainage, and the provision of education in Ipswich. This risk also includes financial consequences in resolving any inadequacies in the infrastructure that has, or has not, been provided in time to meet needs.
11. Further engagement in the consideration of the impact and necessary mitigation measures is likely to only involve staff resources at this stage. The principal position is that this development must provide or contribute towards the provision of infrastructure.
12. If the county council does not engage in this process, there is a significant risk that an insufficient account will be taken of the impact of development on services and infrastructure provided by this authority.
13. An Equality Impact Assessment (EqIA) has not been completed and does not need to be undertaken because the decision being taken is the content of a formal response to a planning application, the determination of which would be undertaken by Ipswich Borough Council who have the same duty to protected characteristics.
14. The policies used for determining planning applications rest with Ipswich Borough Council and an EqIA for its Local Plan has been undertaken. More detailed guidance on the wider development was agreed by Ipswich Borough Council in 2014.

What are the timescales associated with this decision?

15. The county council is having ongoing dialogue with the applicant and Ipswich Borough Council. Cabinet approval of the current position is necessary so that the county council can provide future responses to Ipswich Borough Council in order that it can determine as expediently as possible.

Alternative options

16. The other option is to not submit a representation at this stage and await further detail and resolution of officer concerns. However, this would cause delay to the process.

Who will be affected by this decision?

17. The northern fringe is the largest contiguous area currently allocated for residential development in Suffolk. Development in this area will affect residents, businesses and visitors of Ipswich and its surrounding area.
18. The land subject to this application is mostly within the Whitehouse and Whitton electoral division. Part of the site (for the country park and car park off Westerfield Road) is within the Carlford division. The two bridges over the railway line would connect to land within the St Margret's and Westgate electoral division. This site is part of a wider land allocation that also includes and Rushmere electoral division.

Main body of report

19. This report is not a complete review of the application and does not set out the requirements for contributions to mitigate the impact of the development on all services such as waste and libraries. Instead, it focuses on the key issues relating to transport, drainage and education and the delivery of the necessary supporting infrastructure. Notwithstanding these key points, the current position on archaeology and a summary of the submitted Health Impact Assessment is also included.

Background – the principle of developing the Ipswich Garden Suburb (IGS)

20. The principle of developing the IGS for up to 4,500 dwellings is set by the Core Strategy, adopted by the Borough council in December 2011. The Strategy also phases the release of land in stages before and after 2021 to promote redevelopment of brownfield land; the first, for 1,000 homes before 2021, being on land west of Westerfield Road and south of the East Suffolk railway line. This phasing was to maintain a supply of housing whilst affording priority to previously developed land.
21. Ipswich Borough Council has adopted (2014) a Supplementary Planning Document (SPD) as interim guidance, which reduces the likely number of homes to up to 3,500. The whole northern fringe area comprises three parcels of land, see appendix 1 figure 1, each promoted by different parties:
 - a) Fonnereau – land to the west of Westerfield Road (application reference 14/00638/OUTFL);

- b) Henley Gate – the land along Henley Road and north of the East Suffolk railway (this application), and
 - c) Red House Farm – land east of Westerfield Road up to the Felixstowe branch line.
22. The interim SPD provides a framework for development of the Ipswich Garden Suburb but cannot be formally adopted until after the revision of the Core Strategy amends the phased release of sites. The County Council did respond during the consultation stages of the SPD. The Cabinet agreed the Council's position on 26 February 2011 and, most recently in January 2014; a further representation was submitted that stressed the need for greater priority being given to sustainable modes of travel.
23. The Cabinet endorsed similar recommendations in 2014 with regard to the application to develop the Fonnereau part of the IGS. Since then, officers have been working with Ipswich Borough Council and the developer promoting the scheme to address outstanding matters.

Background – the current application

24. A cross-boundary outline planning application for the Henley Gate parcel was submitted by Crest Nicholson to Ipswich Borough Council (IP/16/00608/OUT) and Suffolk Coastal District Council (DC/16/2592/OUT) in June 2016.
25. The application site covers an area of agricultural land approximately 78ha (193 acres) in area. It is situated to the north of the Town Centre, east of the Castle Hill area and west of Westerfield Train Station. Westerfield Road to the east of the site, Lower Road is to the north, and Henley Road is to the west. The southern boundary follows the East Suffolk branch railway line.
26. Only a small part of the application site is within the administrative area of Suffolk Coastal District Council. Parts of the country park and a car park are within this boundary
27. The planning application is for the development of the northern parcel of land (Henley Gate) – see appendix 1 figure 2. Up to 1,100 homes are proposed, the development also includes:
- a. A country park of some 30.5ha (75 acres);
 - b. Retail outlets for convenience, comparison and hot food takeaway (800m² / 8611ft²);
 - c. Community centre;
 - d. Primary School (two form entry – 420 places);
 - e. Open space including children's play and allotments;
 - f. Outdoor sports facilities (3.75ha including 1.5ha within the school), and
 - g. Two bridges over railway: one for vehicular access, the other for pedestrians and cyclists.

Access

28. Two signal controlled vehicular access and three further pedestrian and cycle accesses are proposed from Henley Road. The need for a vehicular bridge and a pedestrian/cycle bridge over the railway is acknowledged in the application. An access for maintenance of the northern end of the country park from Lower Road and a further access from Westerfield Road is proposed but this would only provide access to a car park (10 spaces).
29. Whilst vehicular access from Henley Road to Westerfield Road is not proposed, a route through the site would provide a pedestrian/cycle link to Westerfield Railway Station.

Delivery of Strategic Infrastructure

30. This application is not for planning permission for the entire northern fringe, so the applicants cannot be entirely responsible for the delivery of the strategic infrastructure needed to support this wider development. However, the developers do need to take a share of provision but this responsibility needs to be proportionate, timely and, as the whole northern fringe is central to the implementation of the Core Strategy, supportive of the wider development.
31. The context for the responsibility to ensure proportionate and timely delivery of infrastructure is the statutory and policy tests on the use of all planning conditions and obligations, that these must be:
 - a. Necessary to make the development acceptable in planning terms;
 - b. Directly related to the development, and
 - c. Fairly and reasonably related in scale and kind to the development.
32. A key requirement is the need for development to be in accordance with Ipswich's Core Strategy. The Core Strategy clearly requires developments to be in line with the SPD which identifies "the infrastructure that developments will need to deliver on a comprehensive basis." (Policy CS10).
33. In addition, Policy CS17 identifies key strategic infrastructure needed to deliver the objectives of the Core Strategy including sustainable transport, green infrastructure (including the country park) and strategic education provision. This policy also reiterates that there will be specific requirements linked to the northern fringe.
34. An Infrastructure Delivery Statement submitted with this application acknowledges that there are two types of infrastructure:
 - a. Strategic: to mitigate the cumulative impact of the northern fringe such as the secondary school, and
 - b. Local: which is triggered by and provided within each separate parcel of land.
35. At present, there is no agreement between the promoters of each of the parcels that provides greater certainty to the delivery of strategic infrastructure. However, Ipswich Borough Council has commissioned expert advice to reach a viable and shared approach to the funding and delivery. Officers from the county council have contributed and the work is ongoing.

36. Whilst the case for different options is for the applicant to put forward, various strategies, including the Local Transport Plan, have been formed on the basis of the whole northern fringe coming forward. A partial development could comprise current infrastructure strategies supporting the growth of Ipswich. The challenge in considering this application is not just whether there is adequate provision made for strategic infrastructure but that it will be delivered.

Strategic Transport

37. A fundamental consideration from a strategic transport point of view is that the impact of proposed development in the northern fringe of Ipswich needs to be seen in the context of development across the wider Ipswich area.
38. The scale of housing and employment development planned for Ipswich, and the IGS, is such that, if travel patterns remain as today, the increased demand will lead to significant increases in congestion and delay across the highway network and deteriorating conditions for all road users. The county council's transport strategy for Ipswich, set out in the Suffolk Local Transport Plan, recognises the need to address this problem and sets out an approach based on:
- a. reducing demand for peak hour travel by car within existing communities and workplaces and in new developments;
 - b. managing the limited road space that we have available as efficiently as possible; and
 - c. providing new highway infrastructure particularly to encourage more walking, cycling and use of public transport.
39. This approach has been consistently applied in considering what is needed for the IGS and, to this end, a transport strategy for the northern fringe was prepared for the council by AECOM – the council's expert transport advisers - to support the production of the SPD. The strategy identified the need for significant offsite improvements to cycle and pedestrian routes connecting the IGS to local destinations including the town centre. It also identified the need for a high quality and high frequency bus service with bus priority to ensure a quick journey to the town centre. The strategy also identified the need for substantial travel planning including robust targets to encourage sustainable travel from the development.
40. In order to ensure that traffic is managed as efficiently as possible, the strategy also identified the need to introduce traffic signals for all the site accesses, to the Westerfield Road / Valley Road junction and, potentially, to the Valley Road / Tuddenham Road junction. These signals would be linked to the Urban Traffic Management & Control (UTMC) system so that flow through the network could be properly managed and, if necessary, traffic flow onto the network from each part of the whole development could be controlled so that, at peak times, the capacity of the network is not exceeded.
41. Some highway infrastructure is required within the IGS and needs to be provided by the developers to ensure that there is adequate connectivity for sustainable modes within the wider development. These are:
- a. A foot/cycle bridge over the railway in place of the existing level crossing of the railway line west of Westerfield Road, and

- b. A road bridge across the railway east of Henley Road connecting the southern and northern sites. This bridge is needed for connectivity of bus services, walking and cycling trips to aid integration within the wider development and to reduce car trips for internal local journeys on the external road network.

Longer-term transport measures

42. In the longer term, given the level of forecast congestion if all planned development in Ipswich and adjoining districts is built, it may be necessary to consider the provision of additional highway capacity. Work is already underway to provide crossings at the Wet Dock. This is aimed at supporting further regeneration of the Ipswich waterfront area and improving the quality of the environment between the town centre and waterfront. Modelling has shown that a crossing would also help to mitigate the impact of additional traffic across the town centre.
43. Additional road capacity to the north of the town centre may have some benefit in reducing the traffic impact, not only of the IGS, but also of potential development to the east of Ipswich in Suffolk Coastal. There are likely to be a number of options for new road capacity in the form of a distributor road or relief road. One option could be something similar to the previous northern bypass scheme promoted some 20 years ago. However, there may also be some more affordable alternatives that have fewer environmental impacts.
44. At the independent examination of the Ipswich Core Strategy in 2010, the Inspector made clear that the delivery of the proposed housing development in the IGS did not depend upon the provision of a northern relief road or bypass.
45. Suffolk Leaders agreed to fund further exploratory work to consider options for Northern Routes. The results of this work is expected to be available in 2017 and will be considered alongside options for growth in the forthcoming county-wide Strategic Planning and Infrastructure Framework.

The Current Planning Application - Sustainable Transport and Traffic

46. Officers from the county council have been involved in an extensive pre-application scoping exercise on the Henley Gate development with Vectos, the applicant's transport consultants.
47. The pre-application meetings with Vectos sought to agree a suitable methodology for:
 - a. modelling the off-site junctions;
 - b. considering potential 'rat running' routes;
 - c. potential bus routes to serve the site, and
 - d. potential cycle and pedestrian links from the development site to key destinations.
48. The results of the pre-application discussions were included in the Transport Assessment (TA), which formed part of the formal planning submission. In terms of other transport evidence, the application also includes, chapters in the Environmental Impact Assessment on traffic, noise and air quality, a draft travel

- Plan and a “smarter choices” plan (sustainable travel promotion) for surrounding neighbourhoods (e.g. Whitton and Castle Hill).
49. The application includes a package of sustainable transport measures, including an extension to the current bus services covering North West Ipswich. These improvements have been agreed in principle with the current service providers, Ipswich Buses and First Group. The county council were included in these preliminary discussions.
 50. Should the entire Ipswich Garden Suburb scheme proceed, it is likely that a new circular route for buses would be viable, and the overall masterplan allows for this permeability through the development. This is one reason why the new vehicular bridge is a key piece of infrastructure.
 51. The application includes details of potential walking and cycling improvements from the site to key destinations, although the analysis indicates that most shorter journeys (which could be easily carried out by bike or on foot) are likely to be towards the town centre, which is why this is the priority for improvements.
 52. The proximity of the site to existing routes, including those through Christchurch Park, provides an attractive walking route to the Town Centre during daylight hours. The bridleway between the main park and the Arboretum is accessible to pedestrians and cyclists at all times, but it is likely that lighting and surfacing improvements will be required to make it an attractive route when the park is closed.
 53. As noted above, the scheme includes a vehicle bridge towards the south-western corner and an additional pedestrian and cycle bridge over the railway line, towards the Westerfield Road side of the site. The vehicle bridge will not be open to general traffic during morning and afternoon peak traffic times. This is to avoid creating a ‘rat run’ through the development. The bridge will, however, be open at all times to pedestrians, cyclists and, if required, bus services.
 54. The bridges will link the site subject to this application to the Fonnereau site, which is south of the railway line. This will enable access from the Henley Gate site to the secondary school and the district centre. It will also provide a link from existing neighbourhoods and the two other areas south of the railway line to the Country Park, Westerfield Railway Station and other facilities north of the railway line.
 55. As the vehicular bridge is not proposed to be open to general traffic in peak conditions it anticipated that the main highways impacts will be onto Henley Road.
 56. Vectos have produced a supplementary document, separate from the TA, which seeks to make the case for priority junctions at the access points onto Henley Road, rather than traffic signal control. The county council’s position is that all junctions from the Ipswich Garden Suburb be signalised so that access to the network can be filtered, this requirement is set out in the interim SPD document.
 57. Vectos have provided further information promoting the alteration of key trigger points from 300 dwellings to 750. However, the county council and IBC consider that the 300 dwelling figure relates well to the phasing of the secondary school and district centre and is considered to be a sensible trigger point at this stage.

58. The county council has commissioned WSP to carry out a review of the Vectos TA and supporting information. Some initial feedback has already been provided to the applicants towards the end of July 2016. Officers and WSP are currently awaiting further details from the applicants to address the issues raised to date. Information from WSP will inform the position of the county council as the Highway Authority.

Henley Road / Valley Road Junction

59. The submitted TA proposes a mitigation strategy for the Valley Road and Henley Road signalised junction, which has the most impact from traffic. Owing to limited areas of land in the ownership of the highway authority and recent signal equipment improvements, there are very limited options remaining to provide more junction capacity.
60. In terms of mitigation at this junction, the applicant is proposing banning right turn movements from Henley Road onto Valley Road. Officers from the county council have informed the applicant that this proposal will be very difficult to deliver and that it would lead to other associated issues on adjacent streets. The appellants are reviewing their proposal and will provide an alternative mitigation strategy. Any alternatives will be reviewed in due course but, at present, the mitigation proposed is not acceptable.
61. If southbound traffic on Henley Road was not able to turn right at the Valley Road junction, the traffic would have to use Dales Road and Dale Hall Lane. This is a residential route that is much narrower than Henley Road. Furthermore, an environmental weight restriction applies along Dale Hall Lane which is subject to a Traffic Regulation Order (TRO). Amending this TRO would require consultation and there is no guarantee that any objections arising could be overcome.
62. If northbound traffic along Henley Road were not allowed to turn right, this flow would be forced to use Park Road, which is already a well-used West-East route. This manoeuvre is used although the right turn flare at Henley Road / Valley Road has very little capacity. Residents are unlikely to be convinced that formally banning this manoeuvre was a good idea, and would not result in more traffic using inappropriate streets.
63. Two meetings have also held with Network Rail, on 3 June and 28 July, to discuss possible improvements to the Westerfield Railway station to improve its relationship to the development. The potential for moving the railway station remains a concept that needs to be explored further before these improvements can be formally considered alongside this application.

Public Rights of Way (PROW)

64. Public Rights Of Way (PROW) have significant roles and provide important linkages to wider corporate strategies. The county council's rights of way improvement plan highlights the importance of giving people the greatest opportunity to access the countryside by walking and cycling.
65. Suffolk's walking strategy seeks to ensure existing communities with a population over 500, and all new developments over 10 dwellings have easy access to a one mile natural walk or two hectares of green space, within 500m of their home.

66. The Joint Health and Wellbeing Strategy for Suffolk (outcome 2) states Suffolk residents should have access to a healthy environment and take responsibility for their own health and wellbeing.
67. In common with other infrastructure, the county council's position in terms of rights of way is that this application is part of the IGS and a phased approach for the PROW improvements is needed, in accordance with proposed development timescales. The role of PROW is recognised in the application and is included in the Infrastructure Delivery Statement.
68. Two plans are included in appendix 1 (figures 3 & 4) showing:-
 - a) the recorded and claimed public rights of way network (PROW) within the site and south of the railway corridor (figure 3), and
 - b) the wider PROW network north of the Henley Gate development site (figure 4).

Onsite routes

69. The county council supports the provision of green space and a Country Park. The information set out in the Design and Access Statement adequately caters for pedestrian and cycle inter-connectivity within the site and beyond. The proposed development retains the legal line of FootPath (FP) 18 Ipswich (Fonnereau Way) and is welcomed. The proposed east/west access links from Henley Road to Westerfield Road will connect to the Fonnereau Way.

New Pedestrian Bridge

70. The new pedestrian and cycle bridge is a critical piece of infrastructure providing the overall access throughout the IGS and for access to the country park. The bridge is expected to be designed to cater for pedestrian and cycling uses and to take account of disabled and restricted mobility users.
71. This bridge will allow for the diversion of part of FP18 Ipswich (Fonnereau Way) from its current route over the East Suffolk Railway. The increased use of the crossing from the housing development increases the need for a safe crossing point for a range of users.
72. Network Rail are currently consulting on closing the right of way (Fonnereau Way) where it crosses the railway line west of the B1077 level crossing. The pedestrian route would, instead, be diverted eastwards to the level crossing to then return to the route of FP18.
73. A public consultation event was held in Ipswich on 13 September 2016 and the closing date for comments was 4 October 2016. Suffolk County Council and Ipswich Borough Council are making representations highlighting joint concerns such as: the fundamental need for the crossing and its strategic significance in providing access for the IGS, as well as the relationship of access to the Country Park for the wider mitigation of recreational disturbance to Stour and Orwell Estuaries Special Protection Area.
74. Negotiations with Network Rail are ongoing but improvements to Westerfield Station and proposed pedestrian / cycle bridge would resolve this potential safety issue.

The site's relationship to the wider network

75. In order to maximise the use of sustainable modes of travel between the country park, the development and the surrounding area, the whole length of FP18 will need to be converted to a cycle track (through a cycle track conversion order), including the length recorded south of the railway corridor (C – D on figure 3), through the Fonnereau site to the south. This path will need to be constructed to a width of at least 3.5 metres and be surfaced with a sealed finish throughout (e.g. Dense Bitumen Macadam). Signage and waymarking will also be necessary.
76. Figure 3 also shows (the dotted line) a claimed footpath running from the northern part of the site eastwards to Lower Road. A formal application for a Definitive Map Modification Order (Ref: CPM866) has been submitted.

Offsite Routes

77. The wider PROW map (figure 4) shows the highlighted routes that already allow for pedestrian/cycling and equestrian use but which require varying levels of surface improvement (shaded routes). These are required in order to provide good quality recreational walking and cycling routes between the development and the outlying settlements of Witnesham, Tuddenham St Martin, Akenham and Claydon.
78. In order to facilitate safe and convenient cycling links from the development to connect with the villages of Witnesham, Claydon and Tuddenham St Martin, the county council will be seeking approximately £660,000 in contributions towards surface improvements to some of the outlying recorded network of bridleways and restricted byways. This includes unsealed surfacing (e.g. hoggins or planings) along:
 - a) Route A = Total length 1380m.
 - b) Route B = Total length 630m.
 - c) Route C = Total length 3000m.
 - d) Route D = Total length 1700m, including a new 110 m length of bridleway to be created to connect to Hall Lane at the route's northernmost extent.

Surface Water and Drainage

79. The management of surface water, particularly during adverse conditions, is a significant concern to existing residents and will be a significant concern to the residents of this development. If the capacity of the drainage system is exceeded, or the system becomes blocked, the water will follow its own path (known as exceedance path) but these can be designed into developments. From the information supplied, the proposal does not show the exceedance paths through the site, and how these relate to proposed drainage.
80. Ipswich Borough Council's Supplementary Planning Guidance suggests several ways Sustainable Drainage Systems (SuDS) can be incorporated into open space and ecological mitigation. Whilst the submitted drainage strategy does refer to incorporating SuDS in "conveyance corridors and public open spaces",

there is a lack of evidence that these features, and the system as a whole, will manage surface water effectively.

81. A Flood Risk Assessment (FRA) and indicative surface water drainage strategy have been submitted. Officers from the county council have already provided the applicant with a response outlining concerns.
82. The information originally submitted was not sufficient to confirm the suitability of the drainage systems or the impacts on water quality. For example, no design standards for depths of water or side slopes of Sustainable Drainage Systems (SuDS) were provided.
83. The management/ adoption proposals need to be set out at this stage because there are different design requirements for adopting bodies, which affect design the criteria.
84. The “exceedance routes” and SuDS will need to be protected from development in the future including from permitted development. These will need to be clearly marked and for Ipswich Borough Council to apply the appropriate condition at this stage.
85. Until revised information is provided, such as a revised surface water drainage strategy, the county council cannot confirm how the site would be drained without increasing flood risk or pollution off the site, or achieving adequate standards of flood protection on the site. Information is also needed to demonstrate how SuDS integrate with the outline layout and how the system will be maintained.

Education

86. Ipswich’s Core Strategy places considerable weight on the role of the SPD in the provision of education. Policy CS15 states that “education needs associated with development at the Northern fringe will be identified and sites safeguarded through the development brief to be prepared as a supplementary planning document”.
87. This application follows the main elements that have been set out in the SPD, namely, each parcel contains a two form entry (420-place) primary school and a new secondary school will be provided with the Red House Farm phase. Whilst there remain some details that need to be agreed regarding the connections between primary school and pre-school facilities, the main consideration remains the delivery of the secondary school.

Early Years Education

Direct and cumulative impacts

88. Based on Suffolk’s Section 106 Developers Guide to Infrastructure Contributions, 1,100 new homes is likely to mean that 110 pre-school places would need to be found. With the increase in the entitlement beyond 15 hours from the Childcare Act 2016, the resultant number of Full-Time Equivalent places required is estimated to be 99. This number of places is likely to create the demand for at least three 32-place early years settings. In terms of the whole northern fringe, 320 pre-school aged children are anticipated.

89. Given that this would be a self-contained neighbourhood, current capacity is not as relevant. Notwithstanding this point, there is no current capacity within settings surrounding the site.

Mitigation options and preferred approach

90. Suffolk County Council has previously requested the SPD to reflect the need for additional pre-school places. The adopted interim SPD identifies the need for a nursery and that this should be provided with the primary school.
91. Wherever possible, Suffolk County Council prefers the provision of pre-school settings to be on the primary school site. However, such provision does not need to be alongside the school and could be made in the district centre for example. Given the scale of demand, there is scope for a large (around 60 place) setting associated with the school and a smaller, possibly a community provider, and/or child-minders. Officers from the county council will work with the developer and Ipswich Borough Council to develop an early-years strategy.
92. The application documents, including the Planning Statement and the Infrastructure Delivery Statement do not fully recognise the need for early years provision. Reference is made to a nursery with the primary school but the provision is not fully integrated into the application and needs to be updated to reflect the likely increased demand. This must be addressed in order for Suffolk County Council to be able to support the application.

Primary-schools

Direct and cumulative impacts

93. Based on Suffolk's Section 106 Developers Guide to Infrastructure Contributions, the provision of 1,100 new houses is likely to mean that 275 primary school aged children will be living on site.
94. The likely number of children will depend on the final housing mix, which will be determined as a reserved matter. Fewer children are anticipated if flats are permitted. However, the county council's position needs to be secured as if all the homes were houses with two or more bedrooms.
95. Notwithstanding this position, based on the indicative housing mix stated in the application, the number of primary, secondary and sixth form pupils is as follows:

Table 1. Anticipated number of pupils based on the indicative housing mix

Henley Gate Housing Mix	Number of Homes	Total Pupils/Students		
		Primary	Secondary	Sixth
1 bed flat	66	3	1	1
2 bed flat	56	8	1	1
2 bed house	246	62	44	10
3 bed house	384	96	69	15
4 bed house	272	68	49	11
5 bed house	76	19	14	3
Total	1100	237	164	37

96. If the same proportions of housing types are applied to the whole 3,500 dwellings proposed throughout the Garden Suburb, around 755 primary-aged children would be expected to live there.

Mitigation options for cumulative impacts

97. The application supports the SPD's requirements for a primary school to be provided within this parcel. Given the limited existing capacity, the phasing and degree of physical separation between the three parcels, there are limited options and the approach to secure a primary school on each parcel of land to meet demand is still valid. During the early stages of the development, there may be a need for some temporary provision and officers will finalise the need for such provision as the application progresses.
98. The impact of the whole northern fringe could be mitigated by three one-and-a-half form entry (315-place) primary schools. Owing to a greater number of homes being proposed previously and the need to secure flexibility in case pupil yields are higher than expected, two form entry (420 place) schools have been requested by the council, which has been reflected in the SPD and this application.
99. This application confirms the number of homes for this site and provides greater certainty that a 315 place school would be appropriate. However, the county council has experienced higher levels of pupil yields than forecast at some new schools built alongside new developments. These experiences highlight that more land must be made available to cater for this eventuality.
100. The county council needs to maintain its requirement for land to be made available so that a 420-place school could be built but that developers contribute to the equivalent of a 315-place school. This increases the amount of land required for a primary school (including early years) from 1.62 hectares (4 acres) to 2.06 ha (5 acres). The additional land would need to be reserved if necessary to meet need over that which was forecast and, if not needed, could revert back to the development.

Secondary-school

Direct and cumulative impacts

101. Based on Suffolk's Section 106 Developers Guide to Infrastructure Contributions and all the dwellings being houses, the proposed development of 1,100 new homes would be likely to mean that 198 secondary and 44 sixth-form students would be living on site (this does not take into account the impact of the change in statutory age to be in education until 18).
102. The likely number of children will depend on the final housing mix, which will be determined as a reserved matter. Fewer children are anticipated if flats are permitted. However, the county council's position needs to be secured as if all the homes were houses with two or more bedrooms. Table 1 above shows that, with the indicative dwelling mix, 164 secondary and 37 sixth-form students would be anticipated.
103. If the same proportions of housing types are applied to the whole 3,500 dwellings proposed throughout the Ipswich Garden Suburb, around 522 secondary pupils and 119 sixth-form students would be expected to live there.

104. The current and forecast capacity is a critical feature. The table below shows the forecast pupils and the cumulative available capacity of the following nearby secondary schools (Copleston High School, Northgate High School, Ormiston Endeavour Academy, Westbourne Academy) up to 2025, when only 60% of the homes in the northern fringe will have been completed:

Table 2. Combined Forecast Capacity in area (Copleston High School, Northgate High School, Ormiston Endeavour Academy, Westbourne Academy) and cumulative impact of residential development in the Ipswich Garden Suburb (IGS).

Year	Forecast Available Capacity (95%) in Area without IGS	IGS Cum. Dwellings	Pupils/Students within IGS		Impact on Capacity
			Secondary	Sixth	
2016	536	1	0	0	536
2017	387	101	14	3	370
2018	299	202	27	6	265
2019	156	379	60	13	82
2020	-57	679	109	24	-190
2021	-223	979	163	36	-422
2022	-310	1279	217	48	-575
2023	-535	1579	271	60	-866
2024	-632	1878	325	72	-1029
2025	-701	2077	365	81	-1147

105. The above forecasts reflect the increase in primary-aged children that Ipswich and many other areas have experienced and indicate that around 700 more secondary and sixth form places will be required to meet forecast need even without the development of the Ipswich Garden Suburb. Based on the above housing mix in table 1 and all 3,500 homes being built, 1,342 secondary and sixth form places will be needed to meet need.

Mitigation options for cumulative impacts

106. The provision of a new High School in the Garden Suburb has been a part of the wider strategy to increase the capacity of secondary places in Ipswich. The school will be phased in order to achieve a final 1,200 place High school, which is a common size in Suffolk. There is, however, an interaction with sixth-form provision in the area that could increase the overall size to 1,600. The development of a secondary school with a sixth form of this size (1,600) may present a challenge but would be still possible on a 9ha site.

107. In terms of sixth-form provision, the area is served by Northgate and Copleston with other schools in the area (inc. Ormiston Endeavour and Westbourne) having given up their sixth forms to allow the establishment of Suffolk One.

108. The supply of sixth form places in Suffolk will be increased in 2018 with the opening of the new Sixth Form facility in Bury St Edmunds. The Suffolk Academies Trust - a collaboration between West Suffolk College and Suffolk One

Sixth Form, in Ipswich; King Edward VI School and Samuel Ward Academies Trust – is proposing 500 students in its first year and then to expand to 1,000 the following year.

109. This is likely to attract students from the western fringes of Babergh and Mid Suffolk that might have otherwise attended Suffolk One. Therefore, there is some potential for additional sixth-form capacity to become available.
110. Prior to the opening of the new high school, parents would have an opportunity to express preferences for any school in the area. This will make use of any limited surplus capacity in local schools. If the council is unable to meet parent's preferences, the local authority has a duty to offer them a place at the next nearest school with a place available. In the short term this will make use of all the surplus places at nearby schools. The alternative is bussing children across the town which is not an acceptable or sustainable solution.
111. The table above (table 2) above reinforces the county council's position that the additional provision is needed by 2020 if the IGS is developed as set out in the Core Strategy and SPD. Some temporary provision is likely to be needed to meet the demand in 2020. However, the scale of the likely demand from 2021 is too great for temporary places to be a realistic or sustainable option.
112. The alternative option to building a new school is enlarging existing schools. However, this is unlikely to be achieved at Copleston, Northgate and Westbourne and the potential enlargement of Ormiston Endeavour has not been tested or discussed with the sponsor or governors. Given the overall size of the northern fringe, this option would be less suitable and contrary to the overall strategy that has been set out in the SPD.
113. The forecast build out and current capacity forecasts suggest that the school building could be designed to accommodate 900 pupils in a first phase but within five years the school would need to increase in size to 1,200.
114. The overall phasing of the secondary school is subject to: background population change, the rate of development within the IGS and the need for a sixth form. The current assumption on phasing is:
 - a. Phase One (2021-2029): 600 place high school with core infrastructure for a 900 place school;
 - b. Phase Two (2023): Increase in capacity to 900;
 - c. Phase Three (2025): Increase core infrastructure and classrooms for 1,200 places, and
 - d. Phase Four (>2025): Increase overall capacity to 1,600 places.

Commitment to deliver secondary school

115. The submitted Infrastructure Delivery Statement does acknowledge the need for a new secondary school. The assumption has been that the landowners and developers would commit to financial contributions to delivering the school as part of a strategic Infrastructure Delivery Plan. However, the applicant is also suggesting an alternative strategy that requires each parcel to provide the strategic infrastructure within its own area.

116. Without an overarching agreement, this leaves the county council in a vulnerable position because the secondary school is part of the Red House Farm area which is a later phase and no application has currently been submitted.
117. In terms of securing the site for a secondary school, the county council is currently obtaining expert advice on the process, potential costs and risks involved in securing the site currently proposed for the secondary school. The county council will use this advice in reviewing its options, including the potential for the school to be part of the Free School Programme.
118. The applicant and other developers and landowners are working with Ipswich Borough Council and the county council to work out a viable and sustainable approach.
119. At present, whilst the general agreement to the provision of the new secondary school is welcome, without more formal mechanisms provided by the developer(s) to ensure delivery, the county council could encounter significant risks and, therefore, cannot support this proposal in its current form.

Archaeology

120. The site has been subject to desk-based assessment, a geophysical survey and fieldwalking. The fieldwalking exercise found evidence of burnt flint and stone tools, particularly in the south-west part of the site, suggesting a potential for late bronze age and iron age settlement.
121. Since the application was submitted, trial trenching has been undertaken throughout the areas of the site that will be developed. The results of the trial trenching have yet to be reported but will inform the determination of the application and whether the indicative layout could be implemented. There might be the need for areas to remain undisturbed because of an archaeological feature that needs to be protected (known as preservation in situ). This might result in plans being altered and/or conditions applied to restrict development.

Health & Wellbeing

122. A Health Impact Assessment (HIA) was submitted with the application, which is welcomed. The Public Health Team were not asked to assist in the scoping or to sign off the HIA, although elements of the county council's response to the screening of the Environmental Impact Assessment were incorporated. In terms of health and lifestyle behaviors, the comparison with England is not always appropriate because it underrepresents Ipswich's needs. A more appropriate comparison would have been to Suffolk.
123. Many observations contained in the HIA are correct but alternative conclusions could also be reached. Furthermore, by looking at the development individually (rather than collectively as Ipswich Garden Suburb) there is a risk that the health impacts may be understated. In turn, this will lead to less mitigation than required or a piecemeal approach to mitigation. Whilst the HIA does draw evidence from the EIA process, the development's contribution to cumulative health impacts should have been set out more clearly.
124. The HIA does make good reference to active travel and the role of the travel plan and the "smarter choices" travel planning provided for surrounding residents.

These would have positive benefits to health through increased exercise. However, the document does not draw from the benefits from the necessary improvements to the wider PROW network, which could also have a positive impact on existing communities.

125. The impact on local health care infrastructure is reviewed in the HIA but will need to be monitored closely as demographics and the mix of patient types can make substantial differences. There is no mention of pharmacies, which are key components of health care infrastructure, especially within or adjacent to more deprived areas. The potential for a community pharmacy, which may be part of the district centre, should be considered further.

Conclusion

126. At present, there are deficiencies in the evidence that has been submitted with the application. These are significant concerns that will need to be addressed before Suffolk County Council (as the highway, lead local flood and education authority) can support the application.
127. The need for the two bridges crossing the East Suffolk Railway and the provision of the secondary school has been clearly set out previously, not least in Ipswich Borough Council's Interim Supplementary Planning Document. These strategic pieces of infrastructure are reflected in the application such as in the Planning Statement, Infrastructure Delivery Statement and the Design and Access Statement.
128. Many of the outstanding concerns could be addressed. However, the degree of uncertainty about traffic impacts, surface water drainage and whether the strategic infrastructure will be delivered imposes considerable risks to Suffolk County Council, so much so that the council should not support the application in its current form. If the deficiencies in the evidence and the lack of clarity on infrastructure delivery are addressed, the county council will be able to consider the application more favourably.

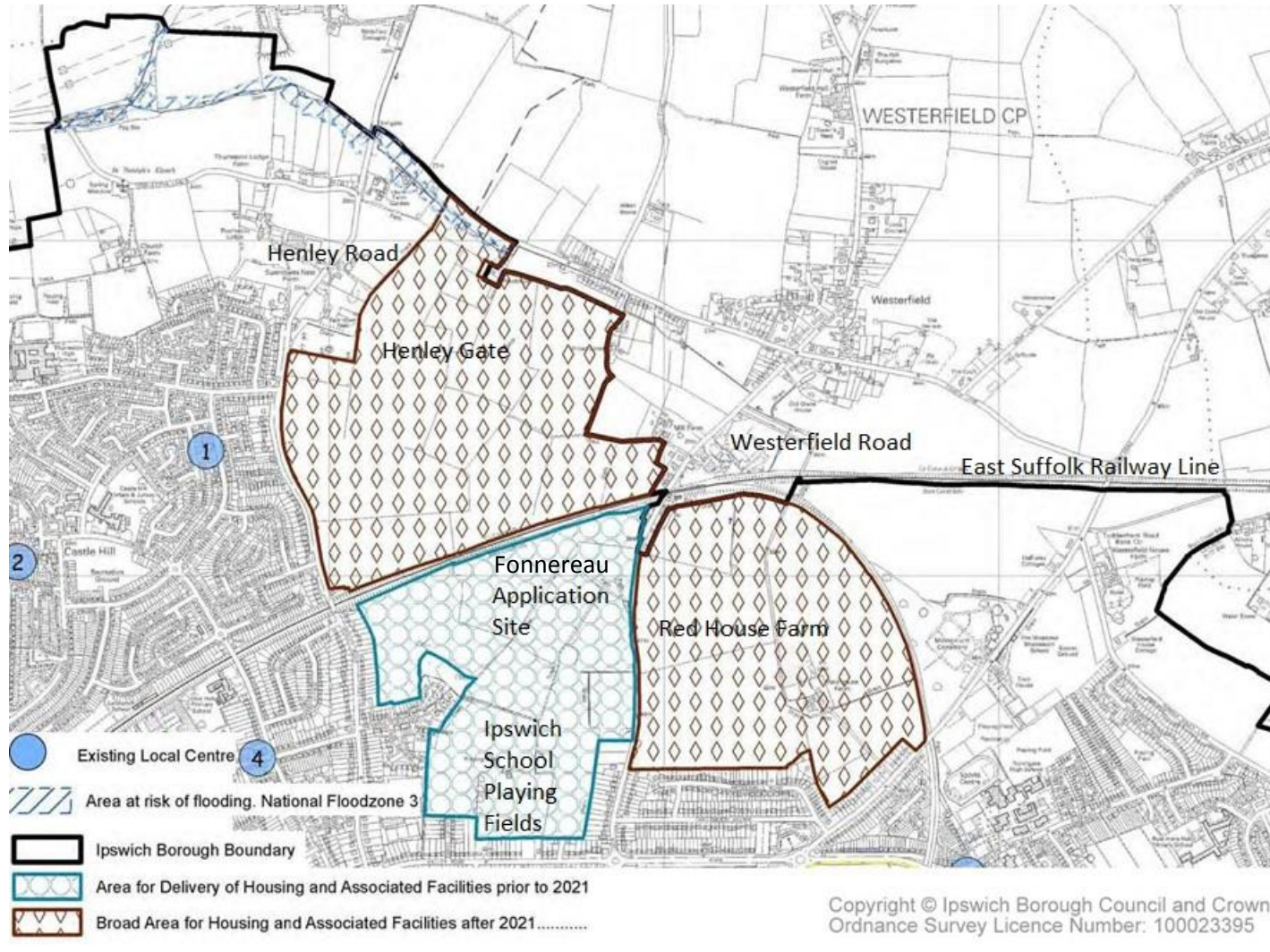
Sources of further information

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- k) Suffolk County Council (2006) Rights of Way Improvement Plan -
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- l) Suffolk Walking Strategy (2015)

- m) Suffolk Flood Risk Management Partnership (2016) Suffolk Flood Risk Management Strategy- <http://www.greensuffolk.org/assets/Greenest-County/Water--Coast/Suffolk-Flood-Partnership/19431A-Flood-Risk-Management-Strategy-v12.pdf>

Appendix1 - Figure 1

Extract of Northern Fringe Area from Ipswich Borough Council's Adopted Core Strategy



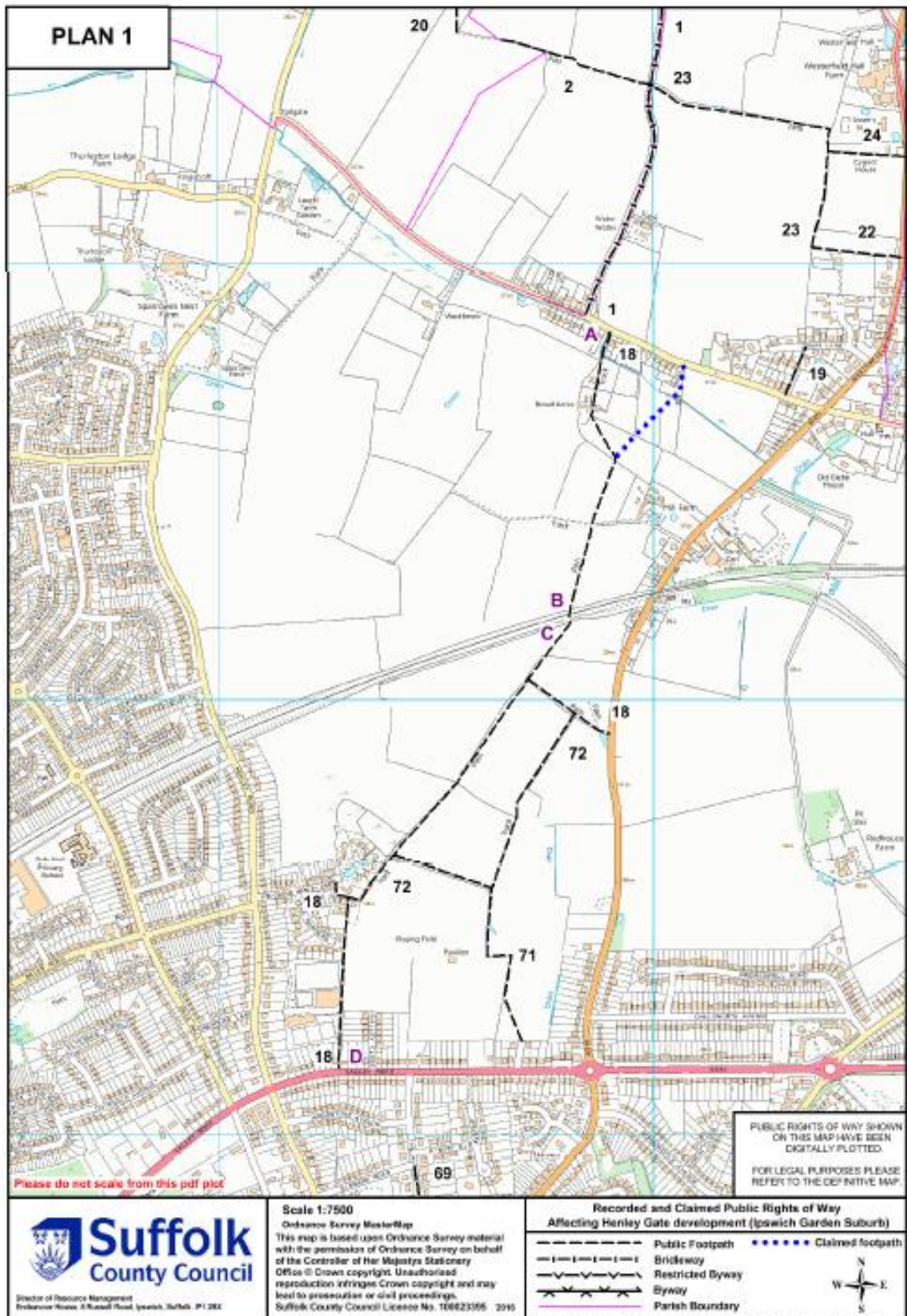
Appendix 1 - Figure 2.

Application Site, Access Proposals and Surroundings – Taken from the submitted Design and Access Statement



Appendix 1 - Figure 3.

Recorded and Claimed PROW affecting the Henley Gate site (Plan 1)



Wider Public Rights of Way surrounding the Henley Gate site (Plan 2)

