



The Planning Inspectorate

Report to Ipswich Borough Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Ipswich Borough Council Core Strategy and Policies Development Plan Document Review and the Ipswich Borough Council Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document

The plans were submitted for Examination on 14 December 2015

The Examination hearings were held on 22 and 23 March 2016 and between 28 June and 20 July 2016

File Refs: PINS/R3515/429/6 and PINS/R3515/429/4

Abbreviations used in this report

AA	Appropriate Assessment
DCLG	Department for Communities and Local Government
dpa	dwellings per annum
DtC	Duty to Co-operate
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
IGS	Ipswich Garden Suburb
IPA	Ipswich Policy Area
LDS	Local Development Scheme
MM	Main Modification
NPPF	National Planning Policy Framework
OAN	objectively-assessed need
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Ipswich Borough Council Core Strategy and Policies Development Plan Document Review and the Ipswich Borough Council Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document provide an appropriate basis for the planning of the Borough provided that a number of main modifications [MMs] are made to it. Ipswich Borough Council has specifically requested me to recommend any MMs necessary to enable the plans to be adopted.

The MMs all concern matters that were discussed at the Examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications, and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. In some cases I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the plans after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Making clear that the objectively-assessed needs for new housing, employment land and new retail floorspace will be reviewed in the short term, the Council doing so in partnership with neighbouring authorities.
- Making clear that the interim plan-period requirement figures are at least 9777 new dwellings and 35ha of employment land.
- Making clear that, pending the review, the plans do not set a requirement figure for new retail floorspace and revising policies CS14 and SP1 to permit retail development on sites not allocated for it, subject to various criteria.
- Revising policies DM25 and DM34 to, in principle, allow for housing development on employment land outside the identified Employment Areas and on land designated as countryside, subject to various criteria.
- Revising policy CS10 in respect of affordable housing requirements and "triggers" for the provision of infrastructure at Ipswich Garden Suburb.
- Various other changes to ensure that the plans are up to date, internally consistent, effective, justified and consistent with national policy.

Introduction

1. This report contains my assessment of the Ipswich Borough Council Core Strategy and Policies Development Plan Document Review and the Ipswich Borough Council Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). Together the documents, which I refer to collectively as the plans, set out a core strategy, site allocations and development management policies for Ipswich as a whole and an area action plan for the IP-One area. The report considers first whether preparation of the plans has complied with the duty to co-operate. It then considers whether the plans are sound and whether they are compliant with the legal requirements. The National Planning Policy Framework (NPPF), paragraph 182, makes it clear that in order to be sound a local plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the Examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Ipswich Borough Council Core Strategy and Policies Development Document Plan Review and the Ipswich Borough Council Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan, submitted for Examination in December 2015, are the basis for my Examination. They are similar to the documents published for consultation in November 2014 but include a number of pre-submission modifications on which consultation was carried out in October/November 2015.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications (MMs) necessary to rectify matters that make the plans unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the Examination hearing(s), are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendices.
4. Following the Examination hearings the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation and I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for Examination the Council is required to provide a submission policies map showing the changes to the adopted policies

map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as:

- Local Plan Policies Map (including Modifications) September 2015
 - Local Plan Policies Map IP-One Area Inset (including Modifications) September 2015
 - Plan 1 – District and Local Centres, September 2015
 - Plan 2 – Flood Risk (including Modifications) September 2015
 - Plan 3 – Conservation Areas (including Modifications), September 2015
 - Plan 4 – Area of Archaeological Importance, September 2015
 - Plan 5 – Ipswich Ecological Network, September 2015
 - Plan 6 – Green Corridors (including Modifications), September 2015
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, a number of the published MMs to the plans' policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective
7. These further changes to the policies map were published for consultation alongside the MMs [as MM43, MM44, MM103, MM104 and parts of MM60, MM66 and MM91].
8. When the plans are adopted, in order to comply with the legislation and give effect to the plans' policies, the Council will need to update the adopted policies map to include all the changes proposed in the policies map as detailed above and the further changes published alongside the MMs.

Assessment of Duty to Co-operate

9. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of preparation of the plans.
10. The Council's *Statement of Compliance with the Duty to Co-operate* details the organisations with which it engaged in the preparation of the plans including, amongst others, Suffolk County Council, Babergh, Mid-Suffolk and Suffolk Coastal district councils, Historic England, Natural England and the Environment Agency. Complementing the engagement with the other local authorities is the Council's membership of the Ipswich Policy Area Board, established in 2007, to provide a forum in which the authorities can work together on a range of issues and, in particular, to deliver housing and employment growth targets and to coordinate the delivery of necessary infrastructure.

11. The *Statement of Compliance* document also identifies nine strategic matters in relation to which the Council has engaged with others in the preparation of the plans: housing provision; gypsy and traveller accommodation; employment needs; transport infrastructure; flood risk; protection of heritage assets; Special Protection Area impacts; green infrastructure and co-operation with the Marine Management Organisation. For each matter the document details the management and working arrangements which have guided the engagement, the evidence base used and the outcome of the engagement and the on-going co-operation. A notable aspect of the partnership working is the preparation/commissioning by the Council of studies jointly with its partners, including the *Strategic Housing Market Assessment (2012)*, the *Ipswich Housing Market Area Population and Household Projections (2013)*, the *Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2013)* and the *Employment Needs Assessment (2016)*.
12. There is evidence of a high level of engagement with others by the Council in preparing the plans and I note that none of the bodies with which the Council is required to engage in pursuit of the Duty to Co-operate has suggested that Ipswich Borough has not adequately discharged the duty. Moreover, there are written statements from a number of these bodies confirming their belief that the Council has complied with the duty. Nonetheless, there are a significant number of representors who contend that the Council has failed to adequately discharge the duty, particularly in relation to unmet housing needs and infrastructure provision.
13. Fundamentally it has been argued that Ipswich Council did not alert the neighbouring authorities about its likely inability to fully provide for its own housing needs early enough or with sufficient emphasis, and there is no evidence of a specific communication from the Council on this particular point. However, at the hearings the neighbouring authorities confirmed that they had been aware of Ipswich's difficulties in this respect for a number of years, and certainly prior to the submission of the plans for Examination. Moreover, whilst it is the case that the brief minutes of the Ipswich Policy Area (IPA) Board meetings do not provide explicit evidence that Ipswich's potential unmet needs have been discussed in detail, it is clear that the Board was addressing the broad issue of cross-boundary housing in its resolution of November 2013 that the objectively-assessed needs of the IPA should be met within the IPA. Furthermore, the context for this resolution is agreement, also, that the IPA should use the population and household forecasting scenarios employed by Ipswich Council (the Luton Report of September 2013) – ie that which forms the basis of the objectively-assessed need for housing set out in the submitted plans. To my mind this suggests that the IPA Board had been made aware of the housing supply situation in Ipswich shortly after the relevant evidence had been prepared/published.
14. It is also contended that through the Examination of the Babergh Core Strategy, Ipswich Council failed to seek to secure provision for the Borough's potential unmet housing needs. Whilst there is little detailed evidence before me on this issue, I note that Babergh Core Strategy was submitted for Examination in November 2012 and the main hearing sessions were held in March 2013, many months before the September 2013 publication of the objectively-assessed housing need for Ipswich on which basis unmet housing needs in the town have been identified. Whilst the timing is unfortunate I am,

thus, not persuaded that this is evidence of Ipswich Council having failed to discharge the Duty to Co-operate.

15. There is also no convincing evidence to indicate that Ipswich Council did not actively engage with relevant bodies in connection with infrastructure requirements in the preparation of the plans.
16. An outcome of the Council's co-operation with the neighbouring districts and the County Council is the *Memorandum of Understanding relating to planning for housing and employment development within the Ipswich Housing Market Area and Ipswich Functional Economic Area*. Although in existence in draft at the time of the submission of the plan for Examination, it was formally signed by each Council in May-June 2016. The Understanding commits the authorities to agree objectively-assessed housing needs for the Ipswich Housing Market Area and employment needs for the Ipswich Functional Economic Area; to identify broad locations to accommodate forecast growth; to ensure implementation of mitigation measures required as a result of Habitats Regulations Assessment and to prioritise infrastructure delivery. The understanding states that the joint work will take the form of a joint or aligned local plan(s) review and sets out a timetable for its preparation, starting in 2016 with adoption of the plan(s) envisaged in late 2019.
17. Given the enactment of the Duty to Co-operate several years ago, work on joint/aligned local plans would, ideally, be already well under-way or complete. However, there is no persuasive evidence to indicate that the time taken to reach the current point is primarily as a result of any action or inaction of Ipswich Borough Council.
18. It is almost always the case that a body could have done more than it did in discharging a legal duty. However, considered in the round, I am satisfied that where necessary the Council engaged constructively, actively and on an on-going basis with all relevant organisations on strategic matters of relevance to the plans' preparation and that, thus, it has complied with the Duty to Co-operate.

Assessment of Soundness

Main Issues

19. Taking account of all the representations, the written evidence and the discussions that took place at the Examination hearings I have identified ten main issues upon which the soundness of the plans depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Is the plans' overall approach to the provision of new housing soundly based, having particular regard to the objectively-assessed need for housing, the strategy for addressing any unmet housing needs, the desirability of there being a five year supply of deliverable housing land and the needs of gypsies and travellers?

Objectively-Assessed Need for Housing

20. Bearing in mind the availability of relevant data, the *Ipswich Housing Market Area Strategic Housing Market Assessment (SHMA)*, August 2012, determines that, having regard to commuting and migration patterns and the comparability of property prices, the most appropriate housing market for the Ipswich area comprises the Borough of Ipswich and the districts of Babergh, Mid Suffolk and Suffolk Coastal. There is little to suggest that this is not soundly based.
21. At the time of the submission of the plans for Examination the 'starting point' for the consideration of the objectively-assessed need (OAN) for housing was the, then, most recent (2012-based) Department for Communities and Local Government's (DCLG) Household Projections. These indicate a likely increase of 10435 new households in Ipswich Borough (ie only part of the HMA) across the 2011-2031 plan period. I deal with the subsequently published 2014-based projections in paragraph 27 below.
22. I share the concern of the Council and others that the 2012-based forecasts reflect trends of unusually low levels of inward migration and household formation during the recent recession. Consequently, the migration trends of the 2006-2011 period and the household formation rates indicated in the DCLG 2008-based projections may, at the present time, more appropriately reflect likely demographic trends during the period to 2031. In the light of this the plans as submitted contend that the OAN for the plan period is 13550, or 677 dwellings per annum (dpa), although I note that this forecast does not take account of the potential for a further increase in migration from London to Ipswich beyond that which occurred in the 2006-2011 period. Moreover, as discussed below, a housing requirement based on this figure would not necessarily appropriately align housing with employment in the Borough.
23. I also have a number of concerns with the Council's conclusion that the evidence included in the 2012 SHMA does not indicate the need for an adjustment to OAN to reflect market signals. Firstly, it is not clear that the SHMA, prepared before the publication of the *Planning Practice Guidance (PPG)*, specifically considered whether or not an adjustment to OAN was necessary in the light of the market signals evidence. Secondly, the SHMA's

data is at least five years old and in terms of the important issue of overcrowding is based on the 2001 Census and there is no persuasive evidence to indicate that it remains relevant. Whilst the Council has submitted more recent evidence on the number of residential sales, there is no up to date evidence on prices, rents or affordability to support the contention that an adjustment to OAN to reflect market signals is not necessary, notwithstanding that the OAN proposed by the Council is already uplifted from the 2012-based household projections.

24. Furthermore, based on the SHMA, the Council indicates that there is a requirement for 584 affordable dwellings per year throughout the plan period. It is clear that the submitted plans' 15% affordable housing requirement (35% for the Ipswich Garden Suburb, itself subject to a, downward, main modification) would not deliver this figure based on an overall housing requirement of 677 dpa. The PPG indicates that in such circumstances an increase in the total housing figures should be considered where it could help deliver the required number of affordable homes. At the hearings the Council stated that it had not formally given this matter consideration.
25. In line with guidance in the PPG the Council has considered its contended, past trends-based, OAN of 677 dpa against the plan period forecast/target for employment growth derived from the East of England Forecasting Model. It concludes that, if delivered, the OAN would provide more than sufficient housing to accommodate the households necessary to occupy the forecast 12500 (625 per year on average) increase in jobs in the Borough to 2031. Having regard to the comments of some representors, the reported decline in the number of jobs in Ipswich in the 2009 – 2013 period and the average of only 151 additional jobs created in each of the first two years of the plan period, the 12500 new jobs forecast (and target) is, to my mind, a challenging one. There is also a striking difference between the decline in jobs in the 2009 – 2013 period in Ipswich and the growth in neighbouring Babergh (6.8% increase), Mid-Suffolk (4.1% increase) and Suffolk Coastal (4.2% increase). However, the East of England Forecasting Model is a respected analysis and there is no convincing evidence to indicate that in the 15 years to 2031 the forecast 12500 increase in jobs in Ipswich will prove to be wholly unrealistic.
26. Moreover, it is clear that since 2001 (and potentially before that) an increasing proportion of Ipswich's rising population has been working outside the Borough. Consequently, even if the number of jobs in Ipswich does not increase as forecast by the plans, at the present time there is very little evidence to indicate that this would significantly reduce the demand for new homes in the borough. However, whilst it is entirely sensible to seek to align new housing and jobs, it would be a nonsense for an overly optimistic forecast of jobs growth in the Borough to result in an OAN for Ipswich which, as detailed below, is in any event unlikely to be able to be provided for in the town. Consequently, there is a clear need for careful analysis of the alignment of realistic forecasts for employment and housing in the joint planning work about to commence for the Ipswich Housing Market Area and Ipswich Functional Economic Area.
27. Towards the end of the hearing sessions (and some months after the discussion of objectively-assessed housing needs) the 2014-based DCLG household projections were published. For the plan period these now provide a

"starting point" figure of 7799 new households in Ipswich for 2011-2031. However, I concur with the Council that this figure is subject to the same limitations as the 2012-based household projections, being substantially based on unusually low levels of inward migration and household formation during recessionary years and low levels of new dwelling construction in the town. Moreover, the figure does not take account of likely future trends in out migration from London, up to date information on market signals, the identified need for 584 affordable dwellings a year or the alignment of new housing with a realistic forecast of jobs growth. Representations have also suggested that the requirement for new housing in Ipswich is likely to fall as a result of the UK referendum vote to leave the European Union (EU). However, until there is more certainty as to the timing, nature and likely implications of the UK's departure from the EU it is impractical to factor this into forecasts of household requirements in the Borough.

28. Given my concerns about the robustness of the 13550 OAN there is an urgent need for the Council to work with its neighbouring authorities to produce a fit-for-purpose objective assessment of need for new housing for the Ipswich Housing Market Area. This conclusion is consistent with my *Interim Findings* published in April 2016 following the initial Examination hearings but also has regard to the subsequently-published 2014-based household projections. Thus, and in line with the Memorandum of Understanding detailed in the assessment of the Duty to Co-operate, **MM4 - MM6** (policies CS6 and CS7) commit the Council to working with its neighbours to prepare an updated OAN for housing for the HMA as a whole, a strategy for the distribution of it between the constituent districts and the adoption of joint or aligned local plans to deliver this by 2019. These modifications are thus necessary for the soundness of the plan, although I have amended **MM4 - MM6** slightly, reflecting consultation comments, to correct a typographical error and in the interests of clarity.
29. However, the Council contends that appropriate, available and deliverable housing sites within Ipswich itself would only deliver 9777 dwellings during the plan period. Whilst with reference to specific sites there is some challenge to this figure, there is nothing to give confidence that substantially more than this number of dwellings can be delivered in the town to 2031. Based on all that I have read and heard, considered in the round and notwithstanding the 2014-based household projection figure, I conclude that it is highly likely that the forthcoming work will identify that the OAN for Ipswich for the period to 2031 is at least equivalent to the 9777 dwellings which the Council contends can be delivered in this period, and that potentially it will be substantially more. It is therefore likely that during the period to 2031 there will be housing needs in Ipswich which cannot be met in the Borough.

Unmet Housing Needs

30. Notwithstanding the proposed modifications to policies CS6 and CS7 representations have suggested that the plans are insufficiently clear about where and when the likely unmet housing needs will be provided for or the arrangements for determining this. Moreover, it has been argued that, to be sound, the current plans should resolve this matter rather than leave it for a plan review or subsequent DPDs.

31. However, the submitted plans (or any other plans for Ipswich alone) cannot make binding requirements on other authorities to allocate sites for housing in their areas. Ideally the aligned/joint plans which the authorities are working towards producing to address needs across the Ipswich HMA would be in place now, but they are not. Furthermore, aside from the issue of unmet housing need, and whilst I note some Examination participants suggested otherwise, I see there being considerable benefit in getting the submitted plans (subject to necessary modifications) adopted as soon as possible in order to ensure that high quality development to meet the town's needs comes forward as soon as possible.
32. Fundamentally, given the circumstances which the Ipswich Policy Area authorities currently find themselves in, there would be much to gain from the adoption of the submitted plans (subject to necessary modifications) as soon as possible. At the same time there would be likely to be little to lose in terms of getting firm proposals in place to address potential unmet housing needs. Consequently, adoption of the plans modified to require review to determine and deliver housing needs across the HMA for the long term, is thus soundly based. This conclusion is consistent with my April 2016 *Interim Findings* and nothing since then justifies the adoption of a different approach.

The housing requirement and five year supply of deliverable housing land

33. Given the evidence that there are unlikely to be appropriate, available and deliverable sites to deliver substantially more than 9777 dwellings in Ipswich during the plan period, there would be little point in setting the plans' housing requirement, for the period until the updated OAN is in place, higher than this. However, in the interim period until the OAN is reviewed, it is appropriate to set the requirement as at least 9777 dwellings (**MM5** and **MM6**), primarily because, as detailed above, there is potential for the updated OAN to be substantially more than 9777 dwellings and it is possible that some sites not currently identified by the Council could become appropriate, available and deliverable for housing. Moreover, as a general principle it is clearly more appropriate for as much as possible of Ipswich's housing needs to be met within the Borough rather than to be "exported" to a neighbouring authority. However, whilst there is evidence to support the view that the plan period OAN is likely to be at least, or more than, 9777 this figure should not be used to pre-determine or influence the outcome of the review. **MM39**, **MM46** and **MM47** are also necessary to update and amend key targets and policies SP2 and SP3 to accord with modified policy CS7.
34. As detailed in Issue 4 the plans allocate substantially more employment land than the evidence indicates is necessary. Whilst it has not been suggested that any specific such site should be instead developed for housing, the Council has indicated that residential development on some 'second tier' employment land would not necessarily be inappropriate. Similarly, the Council has indicated that there is not an in-principle reason why some of the, relatively small, areas of "unallocated" countryside within the borough could not be appropriately developed for housing. This includes land adjoining the borough boundary at North East Ipswich for which interest in developing the site for housing has been expressed. **MM33** and **MM37** would remove the in-principle restriction of housing on such sites set out in policies DM25 and DM34 of the plans as submitted.

35. The vast majority of Ipswich is built-up and within the Borough boundary there is only a small amount of undeveloped countryside, mostly to the north and north east. It has been argued that further loss of countryside should be resisted on the basis that it provides an important "green lung" for the town. I recognise the importance of countryside in relatively close proximity to built-up areas although the value of the majority of such land within the Ipswich boundary is diminished by the lack of public access to it, other than along mostly main roads and a small number of footpaths. However, inevitably there is a need to balance the value of countryside against the need to provide new homes. And, as discussed at the hearings, the reality is that it is likely that any of Ipswich's need for new dwellings which is "exported" to neighbouring authorities will result in development of land which is currently countryside in any case.
36. Moreover, Ipswich residents are not restricted to use or travel through the countryside within the Borough boundary and, in practical terms, the loss of such land would not significantly lengthen most of the town's residents' journeys to access countryside. Furthermore, in terms of Ipswich Garden Suburb (considered in detail in Issue 2) the plans provide for a Country Park which would be potentially of more value to residents than inaccessible agricultural land. Whilst the loss of countryside is, to my mind, nearly always to some degree regrettable, I conclude that the circumstances in Ipswich do not justify the blanket protection of it against development. Nonetheless, this does not mean that any particular parcel of countryside within the Borough is necessarily suitable for housing development: some parts are subject to Area of Outstanding Beauty designation and others are prone to flooding; in all cases it would be necessary to demonstrate that any practical constraints, such as transport and education provision etc, could be overcome.
37. **MM33** and **MM37** are consequently necessary for the soundness of the plans. Policy DM34's requirement that development should "maintain separation" between Ipswich and surrounding settlements does not mean that there could be no diminution in the existing extent of such separation and a cross reference to policy CS7 is not necessary for the soundness of the policy. There is not currently the evidence to support the allocation of land at North East Ipswich for housing, or to identify it as an "area of search" for residential development in preference to any other land in the Borough. However, there would be no reason in principle why residential development should not come forward on the land in accordance with modified policy DM34.
38. On the basis of an interim housing requirement of 9777 dwellings (489 dpa) a five year supply of deliverable housing land cannot be currently identified in line with paragraph 47 of the NPPF. This is irrespective of whether a 5% or 20% buffer is applied and of whether the shortfall in delivery in the 2011-2016 period is made-up within the next five years or over the rest of the plan period. This emphasises the need for the Council to adopt a positive approach towards appropriate proposals for housing on sites not allocated for residential development and the importance of **MM33** and **MM37**, as detailed above, to the plan's soundness.
39. Where the matter is relevant to the plan in hand the demonstration of a five year supply of deliverable housing land is usually a prerequisite of a sound

plan. However, the circumstances in Ipswich are very unusual. Even though a five year supply cannot currently be demonstrated I ultimately conclude that, nonetheless, the plan, as proposed to be modified, is sound in this respect having regard to the fact that:

- MM4 – MM6 commit the Council to work with its neighbours to produce an up to date OAN for the Ipswich HMA and to produce joint/aligned plans to deliver this by 2019. There is every reason to believe that from this date a five year supply of housing land would be able to be demonstrated in Ipswich and across the HMA;
 - in the interim period the plans allocate for housing all sites which have been fully demonstrated to be suitable, deliverable and available for residential development;
 - the Council is committed to responding positively to any appropriate housing proposals on sites not allocated in the plans for housing, including the land at North East Ipswich, and MM33 and MM37 are modifications which specifically provide for this;
 - a five year supply could be demonstrated if the housing requirement figure were to be 'staged' or subject to a significant downward adjustment, but this would be likely to result in fewer rather than more dwellings being constructed; and
 - there is no evidence to suggest that if the plans were not to be adopted now, more housing would be delivered in the next five years, and, indeed, the continuing lack of certainty resulting from this would potentially mean that fewer dwellings would be constructed.
40. During the Examination the Council suggested that, notwithstanding the lack of a five year supply of housing land, the plan should state that its relevant policies for the supply of housing would not be considered out of date for the purposes of national policy. However, having regard to paragraph 47 of the NPPF, these words themselves would be likely to be considered out of date and would thus be ineffective and pointless. Nonetheless, it is appropriate for **MM6** to make clear that the plans' policies concerning the precise nature of housing development (which are considered in the remainder of this report) are fundamental to achievement of the NPPF's core planning principle (paragraph 17) that housing development should secure high quality design and a good standard of amenity for existing and future occupants.

Gypsies and Travellers

41. *The Gypsy, Traveller and Travelling Showpeople Accommodation Assessment* (2013), prepared for the Council and its partner authorities, provides robust evidence of the need for an additional 24 pitches for gypsies and travellers in the period to 2031. This is addressed by policy CS11 although for the sake of clarity and to ensure that accommodation for gypsies and travellers is planned for on the same basis as that for the settled community, reference to this requirement in the policy itself, as opposed to just the supporting text, is necessary to soundness (**MM11**) The Council has indicated that the allocation of a site for pitches detailed in policy SP4 is no longer appropriate and there is nothing to indicate that this is not a sound judgement. Deletion of policy SP4 is therefore appropriate (**MM48**), given that its protection of existing pitches has been included in CS11 through **MM11**.

42. In conclusion having regard to (i) the objectively-assessed need for housing for the settled community and gypsies and travellers; (ii) the strategy for addressing unmet housing needs (iii) the desirability of there being a five year supply of deliverable housing land; and (iv) the very unusual circumstances in which Ipswich finds itself, the plans are sound in relation to their overall approach to the provision of new housing, subject to **MM4, MM5, MM6, MM11, MM33, MM37, MM39** and **MM46 - MM48**.

Issue 2 - Do the plans set out a strategy and policies for the Ipswich Garden Suburb which are positively prepared, justified, effective and consistent with national policy?

Background

43. The adopted *Core Strategy and Development Policies Document* (December 2011) identifies that, due to the limited availability of previously-developed land in the borough, land at the northern fringe of the town will form the main source of supply of housing in Ipswich after 2021. The land comprises three distinct parcels, situated to the north west, south west and south east and the adopted plan identifies that the land to the south west is an area for delivery of housing and associated facilities prior to 2021 whilst the other two parcels are broad areas for housing and associated facilities after 2021.
44. The Council and relevant developers now contend that all three parcels of land need to be formally allocated for housing, and associated facilities, in order to contribute, as soon as possible, towards the Borough's identified housing needs. Accordingly, the submitted plans, which include a review of the adopted 2011 plan, allocate all three parcels of land as a strategic housing (and associated facilities) site. It is envisaged that the area could accommodate 3500 dwellings in total, 2700 of which could be delivered during the plan period to 2031. This represents about 28% of the 9777 dwellings the Council contends can realistically be delivered in total in Ipswich during the plan period. It is therefore clear that this strategic housing site would make a significant contribution towards meeting the Borough's identified housing needs. There is, of course, not an absolute certainty that the envisaged 2700 dwellings will be constructed during the plan period, although this is not good reason not to allocate the IGS site, or to reduce the number of dwellings proposed there, given the interim housing requirement and the paucity of alternative sites suitable to provide for the housing need detailed in Issue 1.
45. A draft Supplementary Planning Document has been prepared to guide the comprehensive development of the area, now known as the Ipswich Garden Suburb (IGS). Supporters of the development also point out that parts of the IGS are within practical walking distance of the town centre, all of it is within a realistic distance for cycling and that it could be feasibly served by high frequency bus services. Nonetheless, a range of strongly held concerns about the IGS have been expressed by a large number of local residents, focussing particularly on traffic and air quality effects, fresh and waste water issues, impacts on other infrastructure and services and effects on the landscape and nature conservation.

Traffic and Transport

46. The May 2016 *Ipswich Traffic Appraisal Modelling Suite Forecast Model Report* updates similar earlier assessments. This assumes that during the plan period 13550 new dwellings will be constructed in the town (38% more than the plans' interim housing requirement) and that approximately 12500 new jobs will be created. The report forecasts that while many junctions in Ipswich are likely to be close to, or exceed, their capacity in 2031 many other parts of the road network will operate satisfactorily. Overall it is anticipated that average travel time will increase by around 2 minutes in comparison with 2008. The report states that this cannot be considered severe given that day to day travel time fluctuations would be likely to be greater than 2 minutes for most trips. The Council and County Council concur with this view and point out that strategic and localised mitigation measures and wider efforts to promote public transport use, cycling and walking have the potential to lessen further the likely impacts of traffic growth.
47. It is notable that the report's conclusions contrast strongly with the response of the same consultant to traffic appraisal information submitted in support of a planning application for part of the IGS in 2014. Whilst this is clearly somewhat concerning it was argued at the hearings that, in effect, the 2014 appraisal was inappropriately undertaken and it thus exaggerated the likely traffic impacts. I have read or heard no detailed and convincing argument to the contrary. Following the hearings additional information was put before the Examination in the form of more recent traffic appraisal information submitted in support of the planning application for the Henley Gate element of the IGS. However, bearing in mind that this relates to a "live" planning application and that it is, itself, subject to considerable criticism it would be inappropriate for me to give weight to it in my assessment of the soundness of the local plans.
48. In terms of transport mode split assumptions the May 2016 report utilises the National Trip End Model which is based on household surveys of travel patterns within Ipswich itself. To my mind this is a realistic approach and, whilst it does not assume that recent trends of a significant growth in car use will continue, nor does it make any assumptions about the likely success of measures, including those within the plans, to reduce car use. This is a balanced and sensible approach. I also note that the report does not quantify the level of the uncertainty margin in its conclusions. However, this is not inappropriate given the strategic, Borough and plan-wide coverage of the report. Whilst the actual impacts are unlikely to be precisely as forecast, I see no reason to believe that they are necessarily more likely to be higher (ie worse) than lower (ie better) than forecast.
49. It is almost inevitable that development in Ipswich will give rise to an increase in traffic and, notwithstanding the averaged, travel time forecast of the most recent Borough-wide appraisal, almost certainly the impacts will be greater at some locations and junctions than at others. Locations close to IGS would be likely to have higher, rather than lower, increases in traffic because of the amount of development proposed there. It is clearly important that the traffic and transport impacts of individual elements of the IGS and the development as a whole are thoroughly appraised at the planning application stage and the plans provide for this. However, notwithstanding that there is likely to be appreciable increases in peak hour queue lengths on certain approaches to

junctions in the vicinity of the IGS and more widely, I concur with the Council and County Council that the evidence, which is proportionate to the preparation and examination of a local plan, robustly indicates that the traffic impacts of the IGS development are unlikely to be severe. Moreover, if the IGS in its entirety were not allocated for housing, land for residential development to meet the identified needs for Ipswich would have to be found elsewhere, almost certainly further from the town in neighbouring districts. Such locations would be likely to have less potential for cycling, walking and public transport use and resulting increases in traffic in Ipswich, including at junctions on Valley Road, could be of a similar magnitude to, or even greater than, that forecast to arise from the IGS.

Air Quality

50. Several traffic-related Air Quality Management Areas have already been designated in Ipswich. The May 2016 *Air Quality Report* uses 2015 traffic flow data and the context of nationally forecast overall reductions in air quality exceedences (primarily arising from reduced vehicle emissions) to identify, in broad terms, the risk of air quality standard exceedences at 28 junctions across Ipswich in 2031. This "broad brush" approach has limitations although it is, nonetheless, proportionate evidence for the preparation and examination of local plan documents.
51. Exceedences are only considered likely in respect of nitrogen dioxide and the report forecasts a high risk of exceedence in 2031 at three junctions in the central area of the town and a medium or medium/high risk at 13 other junctions, mostly in or close to the central area. At these junctions it is forecast that no more than 5% of all traffic would be attributable to the IGS. At the junctions nearest to the IGS (Valley Road with Henley Road, Westerfield Road and Tuddenham Road), where up to 14% of the traffic would be attributable to the IGS, a low risk of air quality standard exceedence is forecast. The report and its supporting letter indicates that all likely air quality exceedences could be mitigated through measures ranging from localised traffic signal optimisation to a work place parking levy, although there is nothing to suggest all of these measures are a realistic proposition in Ipswich.
52. In summary, there is a significant risk of traffic related air quality exceedences existing in Ipswich at the end of the plan period and the possibility of measures not being in place to mitigate some or all of these cannot be discounted. However, traffic attributable to IGS is likely to make a minimal contribution to any such exceedence. Thus, to my mind the existence and extent of air quality standard exceedences in the town is likely to depend much more on the attitude of all people, travelling to and within Ipswich, towards seeking to minimise the environmental impacts of their travel choices than on the existence, or otherwise, of the IGS. Consequently, I conclude that air quality considerations are not sufficient grounds on which to not allocate land for the Ipswich Garden Suburb in its entirety in the plans.

Water/sewage, schools and other infrastructure

53. It is likely that a significant upgrade of water/sewage infrastructure will be necessary to enable the full development of the IGS. It is clear from submitted correspondence that Anglian Water are aware of this and legislation exists to

ensure that the construction/occupation of dwellings would not be permitted until the necessary infrastructure is in place. Whilst there are few details of the likely implementation timescales for this work, representatives of the relevant developers indicated at the hearings that they consider it unlikely that this matter would significantly delay the envisaged rate of development of the IGS. There is no convincing evidence to the contrary.

54. The plans require the provision of a secondary school and three primary schools as part of the overall IGS development, which are also likely to provide for education needs arising outside the development. If implementation of the IGS were to be delayed significantly alternative provision might be required elsewhere in the Borough. Whilst this might necessitate partial review of the plans they are not unsound in not specifically including a "Plan B" for schools should development of the IGS not proceed as envisaged.
55. Policy CS10 and Table 8B provide for a comprehensive range of other infrastructure to support the IGS development.

Landscape, Heritage and Biodiversity

56. The IGS site is currently predominantly agricultural land. As noted in Issue 1 above, the loss of such land for development is, in my view, nearly always, to some degree, regrettable. However, there is a clearly identified need for more housing in Ipswich and little evidence of there being any other land which could, instead of the IGS, appropriately meet this need. Nor does the evidence, or my visits to the area, indicate that the landscape is of such high value that it should be entirely protected against development. Moreover, as discussed at the hearings, if the housing need is not met at the IGS it will almost certainly have to be met in the neighbouring districts, most likely on open countryside, agricultural land.
57. Development of the scale of the IGS can be expected to have a range of other potential impacts, including on heritage and biodiversity. The plans, as proposed to be modified, require such effects to be assessed and mitigated at the planning application stage and there is no convincing evidence to indicate that there are insurmountable issues which would render the allocation in the plans of the entire IGS site unsound.

Policy requirements

58. It is common ground that it would be clearer for the affordable housing requirement for the IGS to be set out in policy CS10, rather than in policy CS12, and thus, to this extent at least, **MM9**, **MM10** and **MM12** are necessary for the effectiveness of the plans. What is disputed between the Council and developers is the level of the policy's affordable housing requirement, although there is general agreement that the 35% by floorspace requirement of the plans as submitted would not be viable. The Gerald Eve (June 2016) *Ipswich Garden Suburb Viability Assessment* identifies that on a unit basis, which the Council now accepts is the most effective, an average of 23% affordable housing (also referred to as "circa 20%") can be viably delivered across the six anticipated neighbourhoods of the IGS, assuming a density of 32.7 dwellings per hectare (dph). The report separately indicates that if the density of each neighbourhood were to be maximised to 35 dph an additional 233 units could

be delivered across IGS and this would viably allow for 30.6% (ie 31%) affordable housing. In line with the PPG this figure also assumes growth and inflation bearing in mind the length of time over which the IGS would be developed.

59. Concern has been raised about the 35dph assumption and I understand that it is inconsistent with at least one of the already submitted planning applications for the IGS. However, 35 dph accords with the, relatively low density and essentially unchallenged, requirements of policy DM30 and there is no convincing evidence to indicate that, as a matter of principle, such a density of development cannot be achieved whilst simultaneously delivering the garden suburb character desired for the IGS. Whether or not there are good reasons for individual IGS planning applications to be approved at less than 35dph is not a matter before me. However, particularly bearing in mind the constraints in Ipswich in providing for the likely need for new market and affordable housing, it is, as a matter of principle, sound to base the requirement for affordable housing provision at the IGS on the assumption that it would be developed at the average density required by policy DM30. That is to say an average requirement of 31% affordable housing across the Ipswich Garden Suburb, the provision for each individual application being the maximum compatible with achieving the overall target and ensuring viability, with a maximum requirement of 35% for each phase of development.
60. Amending the plans to require "up to 31% affordable housing" is not necessary given the policy's viability clause as proposed to be modified. The 35% cap is supported by the Gerald Eve report evidence, it being the assumed maximum provision for any phase of development, although there is not the evidence to apply this cap at an individual application level. To do so could undesirably result in the "artificial" splitting of phases into separate applications to minimise affordable housing below that which would be viable. However, since the precise affordable housing requirements will be set on an application by application basis, retesting of viability prior to implementation can only feasibly be undertaken on an individual application basis. It is not necessary for the soundness of the policy for the mechanism to secure such retesting (most likely to be through a planning obligation) to be specifically referenced.
61. **MM9** effects these necessary modifications to policy CS10, although I have slightly modified the wording of the supporting text, as consulted on, to avoid ambiguity by more clearly defining a "phase" of development.
62. Policy CS10 also sets out the land uses which are envisaged being provided as part of the IGS development, including approximately 3500 dwellings, public open space and sport/recreation facilities, a country park, a district centre, two local centres, three primary schools and a secondary school. The policy also indicates the approximate area to be dedicated to each use and the facilities anticipated to be provided in the district and local centres. The policies map indicates the location of the country park and the broad/indicative locations of the other main land uses. I do not agree with the argument that the policy and the policies map are excessively detailed and that these are matters appropriately left to the IGS Supplementary Planning Document. It is entirely appropriate for local plans to set out the key facilities to be provided as part of a major urban extension and the policy's approximate indication of

the size of the area for each main use; also, the policies map's broad/indicative location of them provides for an appropriate level of flexibility to respond to constraints and opportunities which may present themselves at detailed design stage.

63. Moreover, given that SPDs cannot set policy which is not contained within a development plan document, it is doubtful that key requirements for the IGS, such as the broad amount of each of the proposed land uses, could be detailed in the SPD (or the Infrastructure Delivery Plan) without reference to them in the local plans. It is argued that the plans' requirements in this respect are inconsistent with the "live" planning applications for parts of the IGS. However, these applications are not before me and whether or not they are approved in their current form does not mean that, at the current time, the plans are unsound.
64. Nor have I read or heard a persuasive argument to indicate that the policy's requirements are not supported by evidence, as detailed in the range of documents, prepared in partnership with service providers, put before the Examination by the Council. To assist in understanding the policy, reference to the CIL Regulations in respect of planning obligations is included in the supporting text. However, it is not necessary for this to be included in the policy itself: these statutory provisions cannot be overridden by a local plan policy however it is worded.
65. Nonetheless **MM9** and **MM10** are necessary, in the interests of clarity and effectiveness, to update policy CS10 in respect of sport and recreation and community centre facilities, the approximate size of the residential development and the names of the neighbourhoods. Moreover, the Council has appropriately proposed a change to the policies map (consulted on as MM44) to make clear that the indicated secondary school access is indicative. I have noted Natural England's comments on MM9 but concur with it that further possible improvements to this modification are not necessary for the plans to be sound. I understand that a Health Impact Assessment for the IGS is listed in the Council's planning application validation checklist. Reference to it in policy CS10 is, thus, not necessary to the soundness of the plans.
66. The Implementation chapter of the Core Strategy includes tables setting out the main infrastructure requirements for the Borough as whole and (in Table 8B) for the IGS. Again this sets out an appropriate level of detail for a local plan. As submitted Table 8B details trigger points for the delivery of each item of infrastructure about which there is a significant degree of disagreement. Moreover, I have not seen detailed evidence to justify each of the trigger points. In the light of this, and for the plans to be justified, **MM9**, **MM10** and **MM38** are thus necessary to delete the trigger points from Table 8b and to state in policy CS10 that triggers for the delivery of infrastructure will be identified through the *Ipswich Garden Suburb Infrastructure Delivery Plan*. I am satisfied that this approach will not undermine the Council's ability to ensure that the infrastructure necessary to support the IGS is provided at the appropriate time and that appropriate consultation takes place.

Phasing

67. It has been argued that the plans should provide for phasing of the IGS to lessen the impact of construction taking place in more than one location at once ("multi-starts") and such that later phases could be modified (or even halted) to reflect any problems (eg traffic or air quality) which result from the earlier phases.
68. However, all the envisaged housing at the IGS is needed to meet the plans' interim housing requirement and, as detailed in Issue 1, even on the IGS build rate currently envisaged by developers the Council is unable to identify a five year supply of deliverable housing land as required by the NPPF. Phasing the IGS would simply exacerbate this problem and could result in the housing needs having to be met on locationally less appropriate open countryside sites in neighbouring districts.
69. Secondly, slower delivery of housing would be likely to delay, complicate and make less certain provision of the necessary supporting infrastructure. An absence, in early years, of infrastructure to promote cycling, walking and public transport could inadvertently create the feared traffic and air quality problems which it has been suggested that phasing of the development would avoid. Consequently, I conclude that phasing of the IGS development is not necessary for the soundness of the plans.
70. In conclusion, subject to **MM9, MM10, MM12** and **MM38**, the plans set out a strategy and policies for the Ipswich Garden Suburb which are positively-prepared, justified, effective and consistent with national policy.

Issue 3 – Do the plans set out allocations for new housing development which are consistent with their overall strategy for housing and which are positively prepared, justified, effective and consistent with national policy?

71. To contribute towards the interim plan period requirement of 9777 new dwellings, and in addition to the Ipswich Garden Suburb, policy SP2 (as proposed to be modified) allocates land for a total of 1844 dwellings across 42 sites and policy SP3 (as proposed to be modified) protects for residential use 24 sites (1991 dwellings) which have planning permission for housing or have it agreed in principle subject to a s106 agreement. **MM46** and **MM47** update the sites and dwelling numbers to reflect changes in circumstances since the plans were submitted for Examination and are thus necessary for soundness. Some of the sites are for mixed uses and the allocations are primarily based on the conclusions of the Strategic Housing Land Availability Assessment. In most instances there is nothing to indicate that the residential elements of these allocations are not soundly based.
72. However, there are significant objections to the Former School Site at Lavenham Road (IP061). Whilst I recognise that the site is currently valued by some as open space, there is an urgent need to provide new housing in Ipswich and very limited land available on which to do so. Moreover, the plans provide for 30% of the site remaining as open space and the large Chantry Park is very close by in any case. Subject to detailed design matters, which

would be appropriately considered at the planning application stage, there is no reason to believe that housing on the site would result in a slum area, excessive loss of peace/tranquillity, significant traffic/parking problems or harm to the living conditions of local residents or insurmountable drainage problems. The allocation is therefore soundly based. I reach the same conclusion in respect of similar issues raised in relation to sites IP031, IP133, IP150b, IP150c, IP152 and IP256.

73. It has been argued that the plans should provide for a number of sites allocated primarily for employment to be developed for a wider range of uses including residential. For sites not within a defined Employment Area DM25, as proposed to be modified (**MM33**), would in principle permit residential use of them. However, Appendix 2 of the Council's Matter 4b hearing statement, which is based on the findings of the Sustainability Appraisal, demonstrates why other employment sites would not be soundly based for residential development or a greater proportion of residential development than is currently stipulated.
74. Concern is raised at the requirement that the Carr Street façade of site IP048 is retained in its redevelopment. The façade is an attractive, locally listed one and is important aspect of the character and appearance of this part of the town centre. Its retention accords with the desirability of sustaining and enhancing the significance of heritage assets as set out in paragraph 126 of the NPPF. Nonetheless, policy DM8 (as proposed to be modified, see Issue 7) allows for a balanced judgement to be made if the requirement is shown to be inhibiting redevelopment. In respect of site IP010a it has been argued that the plans should provide for more flexibility in the balance of uses on the site and greater recognition of potential viability issues. However, bearing in mind that Policy SP2 sets only approximate percentage splits for the proposed uses on the site and that policy CS17 indicates that s106 contributions will reflect viability considerations, the plans are sound in these respects.
75. The policy SP2/SP3 allocations would together provide about 40% of the interim plan period housing requirement of 9777 dwellings - completions, windfalls and the Ipswich Garden Suburb (see Issue 2) providing for the other 60% or so. In this context, and subject to **MM33**, **MM46** and **MM47**, the allocations for new housing development are consistent with the plans' overall strategy for housing and are positively prepared, justified, effective and consistent with national policy.

Issue 4 - Do the plans set out policies and allocations for employment development which are positively prepared, justified, effective and consistent with national policy?

76. To facilitate the 12500 increase in jobs in the Borough projected during the plan period by the East of England Forecasting Model, policy CS13 sets out a positively-prepared approach of allocating land for new employment development, protecting existing employment areas and supporting growth of University Campus Suffolk and Suffolk New College to raise the workforce's skills and qualifications levels. The *Employment Land Needs Assessment* (2016) indicates that 23.5ha of new employment land is required to provide

for the 12500 additional jobs. However, this is a net figure which does not allow for a reasonable level of land/premises vacancy or reflect the fact that most business will have specific locational or other requirements when seeking employment land. Taking account of this policy CS13, as submitted, sets a requirement of at least 30ha land for B1, B2 and B8 plus safeguarding of 10ha of land at Futura Park as a strategic employment site.

77. Given the important relationship between the provision of land for housing and employment it will be necessary to review the employment forecasts and land requirement as part of the forthcoming work, to be undertaken jointly with the neighbouring authorities, to produce a robust housing need figure. However, whilst some questions have been raised about the figure, there is little of substance to indicate that, pending this review, a total requirement for new employment land of at least 40ha is not soundly based, albeit that it is appropriate to reduce the figure to 35ha to reflect recently completed/approved employment development at Futura Park. Moreover, given the amount and nature of the remaining available land at Futura Park it makes little sense to continue to identify this as a strategic employment site in policy CS13, distinct from the other employment areas set out in policy DM25, although there is no persuasive evidence to support its designation as an extension to the nearby district centre. Furthermore, to be justified and effective, and reflecting the fact that in reality employment development is not limited to B1, B2 and B8 uses, it is necessary to modify policy CS13 to make clear that employment development is defined in policy DM25. These changes, including the clear statement that the employment forecast and land requirement will be reviewed in the short term, are all included in **MM13** which is, thus, necessary for the soundness of the plans.
78. In support of Policy CS13 policy DM25 identifies the allocated employment areas and sets out development management principles for employment development. **MM33** is necessary to include Futura Park as an employment area as a result of its re-designation from a Strategic Employment Site under policy CS13. A consequent change to the policies map (consulted on by the Council as part of MM44) will also be required. For the plans to be justified and effective this modification also amends the definition of employment uses to include employment generating sui-generis uses and ancillary uses.
79. Policy SP5 allocates 20 sites for employment use alone or as part of a mixed use development. To ensure consistency with MM33, **MM49** is necessary to include Futura Park in policy SP5 and to modify the definition of employment uses. Concern is raised about site IP140 particularly in respect of likely impact on wildlife, air quality, drainage, hedgerows and the character of the area. However, these constraints, which are referred to in the relevant "site sheet" in the plans or are covered by development management policies, are matters appropriately considered at the planning application stage. I thus conclude that the allocation is soundly based.
80. In total policy SP5 allocates around 56 ha of land for employment purposes - more than the 35ha requirement of policy CS13. A significant proportion of this land is in identified Employment Areas which are the Borough's "top tier" employment sites, likely to be most suited and attractive to new and expanding businesses. Given this, it is appropriate, and not inconsistent with the objective of paragraph 22 of the NPPF, for DM25 (**MM33**) to protect these

sites for employment use or, in specific circumstances, supporting small-scale services or starter homes. It is of course possible that, exceptionally, there may be a justifiable case for permitting the change of use of an Employment Area site to a use other than a small-scale supporting service or starter home. However, it is appropriate for such proposals to be considered on a case by case basis through the development management process. Including in the plans criteria by which such proposals would be assessed would inappropriately run the risk of undermining the role of Employment Areas as the focus for economic growth in the Borough.

81. Nonetheless, the plans allocate some land for employment purposes outside the "top tier" Employment Areas and in excess of the identified requirement. I am not aware of any specific proposals for other uses on these sites. However, as detailed in Issue 1, and given the shortage of housing land in Ipswich, it is necessary for the plan to be justified and effective to modify policy DM25 (**MM33**) to permit housing development on employment sites/existing employment premises outside the identified Employment Areas where it would be compatible with surrounding uses, would make more effective use of the site and would not harm the economic development strategy of the plans. The "town centre first", as opposed to a "market dictates", approach of policy DM25 in connection with office development is consistent with national policy.
82. In conclusion, subject to **MM13**, **MM33** and **MM49**, the plans' policies and allocations for employment development are positively prepared, justified, effective and consistent with national policy.

Issue 5 - Do the plans set out policies and allocations for retail and town centre development which are positively prepared, justified, effective and consistent with national policy?

83. The 2010 Strategic Perspectives' *Retail and Commercial Leisure Study* identifies the need for 3580 – 7161 sq m of additional convenience retail floorspace and 47498 sq m of additional comparison retail floorspace across the Borough to 2026. However, as submitted, the plans (policy CS14) provide for only 15000 sq m of additional retail floorspace through an extension of the Central Shopping Area to include a site allocated for retail at the Westgate Quarter. At the time of submission of the plans the Council argued that a greater amount of land for retail (across a number of sites) had been allocated in the past but had not been taken up. It pointed to the conclusion of a 2013 study (*Appraisal of Ipswich Town Centre Opportunity Areas*) that delivering multiple retail schemes simultaneously would be likely to be difficult and that the Council should aim, initially, to focus new retail development on a single site at the Westgate Quarter. This approach has been criticised by those who argue that the plans are contrary to the statement in the NPPF (paragraph 23) that identified needs for retail should be met in full and others who contend that it is unnecessary and illogical to extend the existing central shopping area, particularly to the opposite side of the town centre from the Waterfront Area.
84. Following lengthy hearing discussions on the matter, and the preparation of further written evidence, the Council has accepted that a convincing case has

not currently been made to restrict the retail floorspace allocation to less than a third of the need identified in the 2010 study, particularly in the light of NPPF paragraph 23 and the contention of representors that the plans should allow flexibility for retail use on other sites. Moreover, given the age of the existing study and concerns about its robustness, it is appropriate for the Council to prepare an up to date assessment of retail needs. However, it would make little sense for that to be undertaken in isolation of the forthcoming joint work with neighbouring authorities in relation to housing and employment land needs.

85. In the light of this, **MM14** is necessary for the soundness of the plan which makes clear that as part of the review of the plans a floorspace requirement for future retail provision will be set and, if necessary, additional retail allocations will be made. That would also be the logical time at which to further review, if necessary, the boundaries of the town centre and Central Shopping Area. In the interim, and in addition to the Westgate Quarter allocation, modified policy CS14 indicates that proposals for retail development (on sites over 200 sq m net) on sites not allocated for retail use will be considered against a modified policy SP1 (**MM45**). Modified SP1 states that whilst the Central Shopping Area remains the focus for significant retail development, proposals for such uses (over 200 sq m net) will be permitted on sites allocated for other uses, subject to them satisfactorily addressing the sequential test and impact assessment, in accordance with national policy, and there being no significant conflict with other requirements of the plans. In response to consultation comments I have amended MM14 and MM45 slightly to include reference to the, also relevant, policy DM23, to make clear that these provisions apply only to retail proposals over 200 sq m net and to explicitly, rather than implicitly, indicate that retail development of less than 200 sq m net will be supported subject to compliance with other policies of the plan. In effect until the reviewed plans set a retail floorspace requirement figure there will not be a local policy basis to resist retail schemes on grounds of need. The 200 sq m threshold for the application of sequential and impact tests is satisfactorily evidenced in the *Retail and Town Centre Topic Paper*.
86. It has been argued that work to identify a robust retail floorspace requirement figure and suitable sites to meet the need should be undertaken prior to adoption of the plans. However, this would be likely to take a number of months and I am not persuaded that the benefit of doing this would outweigh the uncertainty for other development, notably housing, resulting from there not being up to date, adopted plans in place in the Borough. Those sites for which expressions of interest for retail development do exist will be able to come forward through modified policies CS14 and SP1, subject to demonstration of their acceptability with regard to the sequential and town centre impact assessment tests. Moreover, even if a retail floorspace requirement figure were to be set now it is likely that it would need to be reviewed in the light of the housing/employment land requirement figures which, themselves, are to be reviewed in the short-term.
87. The plans as proposed to be modified include interim requirement figures for the provision of housing and employment land. As detailed in Issues 1 and 4 there is robust evidence to indicate that the plan period housing requirement is highly likely to be at least 9777 dwellings and that, at the current time, the 35ha employment land requirement is soundly based. However, there is not

the evidence on which to set a reasonably robust retail floorspace requirement figure, even for an interim period and, thus, setting one could inappropriately restrict the provision of retail floorspace. Consequently, whilst it is not ideal, the modified plans' approach of permitting new retail development subject to the sequential and impact tests, and other appropriate criteria as detailed in modified policy SP1, is a pragmatic solution to the specific circumstances in Ipswich at the present time. Whilst planning applications for development on sites allocated for retail use would not need to be subject to the sequential or impact tests, allocation of a site for retail use in a plan which is not sequentially preferable and/or would adversely impact on an existing centre would not be consistent with paragraph 23 of the NPPF. Consequently, it is entirely appropriate for such tests to be a requirement of any retail proposals (over 200 sq m net) coming forward through policies CS14, DM23 and/or SP1.

88. It is the case that the Westgate Quarter retail allocation remains opposed by some and, indeed, is not supported by *Turning our Town Around – The Vision for Ipswich*, a document to which the Borough Council itself is a co-signatory. However, I have seen no convincing evidence to demonstrate that the additional retail capacity is not needed, that there is a much better alternative site for it or that it would cause significant harm to the existing central shopping area. Moreover, at the hearings, the Council advised that, against the background of minimal retail development in the town centre in recent years, there are strong indications that such development will take place at the Westgate in the near future. Consequently, I conclude that, at the present time, the allocation of the Westgate Quarter site for retail is sound. Nonetheless, **MM50** is necessary to amend policy SP10, concerning the Westgate Site, to reflect the fact that the plans do not currently set a floorspace requirement for new retail development.
89. It has been argued that to assist in achieving development on the site the plans should provide more flexibility in respect of site IP047 and in particular should allow for a range of town centre uses including a hotel, leisure, office and/or retail. It is common ground that B1 office development would be appropriate and, thus, **MM72** is necessary for the plans to be justified. Together policies SP2, SP5 and SP6 and the relevant site sheet also make clear that, in addition to residential, hotel and leisure facilities would be supported. Moreover, through modified policies CS14 and SP1, retail would be permitted on this site, subject, appropriately, to its accordance with sequential and impact tests. Consequently, as proposed to be modified, the plans provide an appropriate level of flexibility to encourage development on this site to come forward.
90. Policies DM20 – DM23 set out development management principles for the Central Shopping Area, district and local centres and for town centre uses outside defined centres. As submitted the plans divide the Central Shopping Area into a primary shopping area, a secondary shopping area and a specialist shopping area. However, to enable the effective application of the sequential test, in line with the NPPF, **MM28**, **MM30** and **MM31** are necessary to retitle these as the Primary, Secondary and Specialist Shopping Frontage Zones and to make clear that the Primary Shopping Area (crucial to the definition of town centre, edge of centre and out of centre sites for retail development) constitutes the Primary and Secondary Shopping Frontage Zones. Consequent changes to the policies map (consulted on by the Council as MM43) will also be

required. For clarity and, thus, effectiveness **MM29** is necessary to include class D1 uses in policy DM21's list of, in principle, acceptable uses in district and local centres.

91. Policy SP14 is a positively-prepared approach to retaining and enhancing arts, cultural and tourism facilities, although for clarity, and thus the policy's effectiveness, **MM51** is necessary to make clear that this applies throughout the Borough.
92. In conclusion, subject to **MM14, MM28 – MM31, MM45, MM50, MM51** and **MM72** the plans' policies and allocations for retail and town centre development are positively prepared, justified, effective and consistent with national policy.

Issue 6 – Do the plans set out policies concerning general development principles which are positively prepared, justified, effective and consistent with national policy?

93. The plans include a suite of 17 or so policies defining general principles for development in the Borough. This also provides the context for Appendix 3A of the Site Allocations document which includes a Site Sheet for each allocated site detailing the proposed use(s) and potential development constraints.
94. CS2 sets out a soundly based overarching approach to the location and nature of development albeit that **MM2** is necessary to reflect the proposed de-designation of Futura Park as a strategic employment site. Policy CS9 sets the context for the selection and allocation of sites. However, as the selected sites have now been included in the Site Allocations document, the retention of the policy has the potential to cause confusion. Its deletion through **MM8** and **MM40** is therefore necessary for the plans' effectiveness.
95. In support of paragraph 50 of the NPPF policy CS8 requires residential development to provide an appropriate mix of dwelling types, in accordance with the Council's *Housing Needs Study* and SHMA, to achieve mixed and sustainable communities. To make the policy effective **MM7** incorporates the important rider that accordance with these documents is required where they are up to date and also provides greater clarity in relation to the exceptions to this general requirement. In the light of consultation comments I have slightly amended the policy wording to also apply the "up to date" requirement to the *Affordable Housing Position Statement*. It has been simultaneously argued that the policy should be more specific about precise housing requirements in defined areas of the Borough and that, at the other extreme, it should merely set housing mix criteria against which schemes could be assessed. I can see there being advantages and disadvantages to both approaches and conclude that the policy in the submitted plan, subject to **MM7**, provides a balanced and soundly-based approach.
96. In line with paragraph 47 of the NPPF policy CS12 sets out a requirement that, outside the Ipswich Garden Suburb, residential development of 15 dwellings or more should provide for at least 15% affordable housing. The identified requirement for 584 affordable dwellings a year (see Issue 1) demonstrates the need for the policy and there is no serious challenge to the findings of the

appraisals of the policy requirement which indicate that it would be viable. As submitted the 15% requirement would apply on a total floor space basis which is unusual and, as discussed at the hearings, would be less than straight forward to operate. **MM12**, which (making it even more viable) would apply the requirement on the much simpler number of dwellings basis, is therefore necessary for effectiveness.

97. Policy DM24 also concerns affordable housing and for clarity and effectiveness it makes sense to delete this policy (**MM32** and **MM40**) and instead incorporate its presumption in favour of on-site affordable housing provision, integrated into developments and not readily distinguishable from market housing into CS12 (**MM12**). These provisions align with NPPF paragraph 50's aim to achieve balanced communities. I accept that the requirements of a specific registered social landlord may mean that an affordable dwelling may not be identical to a neighbouring market dwelling but it is important that it is not readily distinguishable as an affordable home. The policy may need to be modified in due course depending upon the precise details of forthcoming national policy in relation to starter homes. However, in this particular instance, it is not feasible to amend the policy to achieve any practical benefit in this respect at this stage.
98. Policies DM1 and DM2 concern sustainable design/construction and use of decentralised renewable or low carbon energy. To a significant extent the policies as submitted have been overtaken by events – the Written Ministerial Statement (WMS) of March 2015 concerning, amongst other things, streamlining the housing standards system. **MM19**, **MM20** and consequent changes to policy CS1 (**MM1**) are thus necessary to the plans' consistency with national policy. Policy DM2 and criterion (a) of DM1, as proposed to be modified, are requirements, exceeding those of the Building Regulations, relating to energy performance which the WMS indicates can be included in plans until commencement of amendments to the Planning and Energy Act 2008, an event yet to happen. It has been argued that these requirements are not within the spirit of government policy. However, they are clearly in line with the NPPF's core planning principle of supporting the transition to a low carbon future and encouraging the use of renewable resources and, at the present time, the WMS clearly and specifically permits their inclusion in local plans. Moreover, the requirements are equivalent to those of the now defunct Code for Sustainable Homes Level 4 which have been demonstrated to be viable in Ipswich (Docs LPCD26 and PSCD23). Consequently their inclusion in the plans does not render the documents unsound.
99. Evidence indicates that Ipswich is clearly an area of water stress and thus policy DM1's requirement in respect of the 110 litres/person/day water efficiency standard is justified and, again, shown in the viability appraisals to not materially undermine the viability of residential development. However, LPCD26 identifies that, on the whole, non-residential development cannot support the introduction of higher sustainability standards and specifically recommends that the Council does not impose in the plans BREEAM 'Very Good' or 'Excellent' standards on retail or B-class uses. The element of **MM20**, which deletes BREEAM requirements, is thus necessary for the plans to be justified.

100. In line with the NPPF's core planning principle of securing a good standard of amenity for occupants of buildings policy DM3 requires residential development to incorporate well-designed and located outdoor amenity space. In the interests of clarity, and thus effectiveness, **MM21** is necessary to explain in the policy's supporting text that in most instances private garden space should be provided at the rear of dwellings. And, consistent with paragraph 47 of the NPPF, policy DM30 sets out density requirements for residential development, varying appropriately across the Borough to reflect the location and its existing character. The policy also appropriately allows for exceptions for a number of possible, listed, reasons. Whilst alternative suggestions for the precise wording of the policy have some merit they are also not without their problems and I conclude, on balance, that the wording as proposed is soundly based.
101. For consistency with national policy it is also necessary to replace the space standards detailed in the supporting text of policy DM30 with a requirement that new dwellings comply with the nationally described space standards set out in the *Technical Housing Standards – Nationally Described Space Standard*, 2015 (DCLG) (**MM35**). To my mind it is not straight forward for a Council to demonstrate the need for minimum space standards on an authority specific basis. Nonetheless, in the context of paragraph 17 of the NPPF which requires a good standard of amenity for occupants of buildings, the Council demonstrates that the space standards in the plans as submitted (which have been in operation by the Council since 2011) have been successfully applied on more than 80 developments and, as necessary, upheld at appeal. Moreover, there is nothing to demonstrate that in Ipswich dwellings below the nationally described space standards would provide a good standard of amenity. Evidence in the form of the June 2016 Gerald Eve Viability Assessment demonstrates that internal space assumptions which are very similar to (although not precisely the same as) the nationally described standards would be viable.
102. Policies DM12, DM13, DM14, DM26, DM27 set out requirements in respect of extensions to dwellings, small scale infill and backland development, dwelling subdivision, the protection of amenity and non-residential uses in residential areas. The policies are supportive of several of the NPPF's core planning principles, including securing high quality design and a good standard of amenity, and they are soundly based.
103. Policy SP1 safeguards allocated sites for the uses prescribed in the plans, permitting other uses where the identified use is not needed, not viable or deliverable and the alternative use accords with other plan objectives/policies. This appropriately balances the desirability for both certainty and flexibility. Nonetheless, **MM45** includes minor wording changes in the interests of clarity and effectiveness and to make clear that where mixed use development is not viable the Council will prioritise the primary use and community uses.
104. In the interests of clarity and consistency with other proposed MMs and to ensure that they are up to date, justified and effective (particularly in relation to heritage asset constraints, school expansion, transport, water/sewage, port activity and wildlife) a number of modifications (**MM59 – MM102**) are required to the site allocation Site Sheets set out in Appendix 3A of the Site Allocations document. However, I have amended the wording of **MM90** as

consulted upon (reverting back, in part, to the originally proposed wording) so as to avoid inconsistency with the "parent" policy SP5. A number of other suggested changes to the Site Sheets concern matters which are controlled by other policies of the plans (in particular the development management policies) or are not necessary for the plans' soundness. The modifications will also require consequential changes to the policies map (consulted on by the Council as MM103, MM104 and part of MM60, MM66 and MM91).

105. In conclusion, subject to **MM1, MM2, MM7, MM8, MM12, MM19 – MM21, MM32, MM35, MM40, MM45** and **MM59 – MM102**, the plans set out policies concerning general development principles which are positively prepared, justified, effective and consistent with national policy.

Issue 7 – Do the plans set out policies for heritage, design and the natural environment which are positively prepared, justified, effective and consistent with national policy?

106. Aligning with the NPPF's core planning principles (paragraph 17) of conserving and enhancing heritage assets and the natural environment, policy CS4 sets a positively prepared overarching strategy in this respect and is supported by eight detailed development management policies (DM5, DM6, DM8, DM9, DM10, DM28, DM31 and DM33). Nonetheless, for effectiveness and accordance with national policy, **MM3** is necessary to remove the reference to the no longer extant Code for Sustainable Homes, to align the supporting text with national policy and to make clear that decisions will be taken in line with NPPF. I have slightly amended the wording of MM3 so as to avoid it unnecessarily setting out an interpretation of the NPPF. The policy's encouragement of the use of local reclaimed, renewable and recycled construction materials is of relevance to the conservation of the natural environment and is soundly based.
107. Consistent with the changes proposed to policy CS4 **MM22** is necessary to make explicit reference in the supporting text of policy DM5 to the NPPF and, for effectiveness, to reword, but not change the fundamental intentions of, criteria (f) and (h) of the policy. However, given that the applicability of NPPF guidance on heritage matters is referred to in policy DM8, it is not necessary for it to be explicitly referred to in DM5 as well as in its supporting text. Policy DM5's requirement that new development should protect and enhance Ipswich's character is not fundamentally inconsistent with the NPPF's balancing exercise and, indeed, is entirely consistent with paragraph 58 of this document's statement that planning policies should aim to ensure that developments add to the overall quality of the area. I am satisfied that the policy's public art requirement is not inconsistent with national policy or otherwise unreasonable.
108. As submitted policy DM5 also requires that 35% of new dwellings (development of 10 or more units) are built to achieve the access requirements of Building Regulations standard M4(2) and that "a proportion" of dwellings in schemes providing an element of affordable housing are required to be built to the Buildings Regulations standard M4(3). The latter requirement is too vague to be effective or justified and, acknowledging that

the need for such accommodation in Ipswich is likely to be very small, the Council has accepted that this should be deleted from the plan.

109. Document LPCD51 sets out an assessment of the need for and viability of the M4(2) standard. This persuasively indicates the need for 25% of new dwellings to meet this standard with an additional uplift to reflect the likely needs of the forecast increase in the proportion of the population who are elderly (on which the 35% requirement is based). I am not convinced that paragraphs 4.5 and 5.1 of LPCD51 are necessarily inconsistent, the former referring to the location and type of housing which does not necessarily reflect its accessibility referenced in the latter. However, the document's indicated costs for meeting the M4(2) standard have been strongly disputed and its assessment of viability is essentially a combination of evidence from various other assessments rather than a specific up to date assessment of the viability of M4(2) in Ipswich. In the light of this it has been argued by various developer interests that, instead of the 35% requirement in the policies as submitted, the plans should include either no M4(2) requirement or a compromise requirement of 25%.
110. There is clearly a need for a significant proportion of new homes to meet the M4(2) standards, but (notwithstanding the policy's existing "subject to viability" clause) if policy burdens dissuade developers from bringing forward residential schemes then no M4(2) compliant housing would be delivered. Considered in the round I therefore conclude that the policy should set out a reduced requirement that 25% of dwellings (on sites of 10 units or more) are M4(2) compliant, including a "subject to viability" clause. The policy can be monitored and reviewed in due course if necessary to ensure that it strikes an appropriate balance between providing for the accessibility needs of residents and ensuring the viability of development. These modifications are thus incorporated into **MM22**.
111. To be consistent with the proposed changes to policy CS4 **MM24** is necessary to align the wording of policy DM8 and its supporting text with national policy and, in particular, to refer to the applicability of NPPF guidance on heritage matters. However, I have slightly amended the wording of the MM as consulted upon to make clear the approach to be taken in respect of non-designated heritage assets. In the interests of clarity and effectiveness **MM26** is necessary to make clear policy DM10's requirements in relation to hedgerows, applications for works to trees and to specify that it is the removal of a mature tree that would require replacement with two semi-mature specimens. The policy includes an "unless otherwise agreed by the Council" clause which would allow for variation of the requirement in the case of, for example, a very low quality mature tree.
112. **MM23**, **MM25** and **MM36** comprise changes necessary for clarity and effectiveness in relation to policies DM6, DM9 and DM33. In particular these modifications make clear that the "green rim" can be incorporated within development proposals and, is, thus not an in principle barrier to development and that there is a presumption in favour of retaining/repairing buildings and structures of townscape interest. They also make clear where DM9 applies and include reference to the application of NPPF guidance in relation to development which would cause harm to the significance of heritage assets. Once again, I have a slightly amended the wording of this modification such that it does not unnecessarily seek to interpret national policy. Given their

protection through policy DM17 (see Issue 8), reference to public rights of way in policy DM28 is not necessary for soundness.

113. In conclusion, subject to **MM3, MM22 – MM26** and **MM36**, the plans' policies for heritage, design and the natural environment are positively prepared, justified, effective and consistent with national policy.

Issue 8 – Do the plans set out policies for transport and accessibility which are positively prepared, justified, effective and consistent with national policy?

114. Concern about the transport (and related air quality) impacts of the development proposed in the plans have been expressed most vehemently in relation to the Ipswich Garden Suburb (see Issue 2), although wider reservations have been raised, along with suggestions of the need for more transport infrastructure, including by the local MP. As detailed in Issue 2 I conclude that the May 2016 traffic appraisal and air quality reports satisfactorily consider these issues at a level appropriate for a local plan (as distinct from specific planning applications) and that they are robust in their conclusions that transport and air quality impacts resulting from the plans' envisaged development are unlikely to be severe. In relation to Ipswich as a whole it is also notable that the traffic appraisal has assumed that 13550 new dwellings would be delivered during the plan period, around 38% more than the 9777 interim housing requirement figure contained in the plan as modified. Nonetheless, it will be necessary for individual development proposals to be the subject of detailed assessment of their transport effects and to be subject to transport improvement work obligations where necessary. Moreover, there is a need for the Council and its partners to do all they can to promote use of modes of transport other than the car.
115. Policy CS5 is positively prepared and in line with the NPPF's core planning principle (paragraph 17) of actively managing patterns of development to make fullest possible use of public transport, cycling and walking. This is supported by policy CS20 which encourages the upgrading of the Felixstowe – Nuneaton rail line and indicates that consideration will be given to closing the Waterfront North Quays route to general traffic. Although there is some objection to the latter proposal, there is no convincing evidence to demonstrate that detailed consideration of it is not a soundly based approach to managing traffic in the town. However, in the light of my comments above and the representations of many, **MM18** is necessary for the plans' soundness to make clear that the Council will support measures to improve sustainable travel options, including the Travel Ipswich scheme and measures to facilitate cycling and walking. Travel Ipswich's aim of achieving a 15% modal shift by 2031 is an identified target of the plans which is subject to specific monitoring arrangements and, if necessary, plan review. Notwithstanding the comments about the impact of this initiative to date, specific reference to the implementation of additional measures to ensure that the 15% target is achieved is consequently not necessary to the soundness of policy CS20. Whilst it is appropriate for the plans to mention the possibility of an Ipswich Northern Bypass (which is an aspiration of many and the subject of on-going

feasibility work), in the light of the Traffic Appraisal Modelling detailed above the plans are not unsound in not including the scheme as a formal proposal.

116. Policy DM17 appropriately requires applicants to demonstrate how any adverse transport impacts of the development would be managed and mitigated and the policy sets out detailed transport requirements for new development. However, **MM27** includes wording changes necessary for consistency with national policy. It would not be helpful for the plans to refer to "significant adverse" transport impacts in contrast to the NPPF's use, in the same context, of the word "severe", particularly when it is a matter of judgement as to whether or not these terms are materially different. Weighing the benefits of a scheme against transport harm is appropriately considered on a scheme specific basis and does not require a policy reference in the plans.
117. **MM27** also allows for installation of the infrastructure necessary to secure the later introduction of electric vehicle charging points when it can be shown that provision of the charging points themselves is not viable within a development. There is not specific evidence to indicate that even this lesser requirement would be viable although, equally, there is little to demonstrate that it would not be. However, evidence does indicate that it is likely to be substantially cheaper to install the infrastructure required for charging points whilst development is under construction than to retro-fit it. Thus, without the initial installation of this infrastructure, there is the likelihood of electric vehicle charging points never being installed even if a householder is willing to pay a reasonable amount for it. In the light of this, and bearing in mind paragraphs 17 and 93 of the NPPF, which state that it is a key principle that planning should support the transition to a low-carbon future and support the delivery of renewable and low carbon energy and associated infrastructure, I conclude that the modified requirement in respect of electric car charging points is justified. Moreover, in the context of paragraph 174 of the NPPF, which makes clear that the cumulative impacts of standards and policies should not put implementation of the plan at serious risk, it is notable that both the provision of new dwellings and that every development should contribute to the aim of reducing Ipswich's carbon emissions below 2004 levels are key objectives of the plan.
118. Criterion (f) of policy DM17 requires new development to have access to public transport within 400m, which is appropriate given that this distance is commonly recognised as the maximum compatible with ensuring convenient access to public transport. Nonetheless, **MM27** includes a necessary clarification to the policy's supporting text to make clear that this requirement would not be applied unreasonably. However, further change to this policy would not be appropriate and, for example, even if a residential development were to be located very close to a local centre convenient access to public transport to reach other locations (eg the town centre) would be necessary to ensure the sustainability of the development. Concern has been raised at the lack of a definition of "high quality" in respect of cycle storage and shower facilities. It is impractical for the policy or its supporting text to provide such a definition given that it is likely to vary significantly from case to case. However, I conclude that the "high quality" references in the policy are appropriate given that without them poor quality facilities, which would discourage cycling, could be provided and yet be policy compliant.

119. Policies SP9, SP15, SP16 and SP17 detail specific transport proposals including pedestrian and cycle bridges at Felixstowe Road and the Elton Park Works land, other pedestrian and cycling improvements, the Wet Dock Crossing and new short stay/visitor, and replacement long stay, car parks in the central area. There is no convincing evidence to indicate that these proposals are not soundly based, nor that the soundness of the plans is dependent on the inclusion of the pedestrianization of Upper Brook Street and Museum Street. Moreover, there is a need to limit overall central area parking provision in order to minimise wider traffic problems and, thus, it is not necessary for the plans to allocate more sites for town centre car parks.
120. In conclusion, subject to **MM18** and **MM27** the plans set out policies for transport and accessibility which are positively prepared, justified, effective and consistent with national policy.

Issue 9 – Do the plans set out policies for non-transport related infrastructure and services which are positively prepared, justified, effective and consistent with national policy?

121. Five policies set out requirements for new development in relation to non-transport related infrastructure and services. Policy CS15 is, in principle, a positively prepared and soundly based one identifying that new and upgraded primary, secondary, further and higher education facilities are necessary and sites are allocated accordingly. The policy is not unsound in referring to education in respect of the Ipswich Garden Suburb even though this matter is primarily addressed in policy CS10. However, for the plans to be effective and justified **MM15** is necessary requiring that new school sports facilities are made available for use by the wider community. Should the proposed schools at the IGS not come forward at the envisaged time alternative proposals are likely to be necessary to meet education needs. However, it is not feasible at this stage for the plans to identify such proposals. Nor is it necessary for the requirement for alternatives to be provided to be specifically referred to in the plan given that it is a statutory requirement of the education authority to ensure that there is adequate school provision.
122. Policy CS16 seeks to protect and enhance green infrastructure and sport and recreation facilities. However, **MM16** is necessary for the policy to be justified, making clear that contributions to open space provision will be limited to that necessary for the particular development to be acceptable. Matters relating to Ipswich Garden Suburb are considered in Issue 2 and specific reference to public rights of way is not necessary for the policy's soundness. Policy CS17 details the general requirement for development to contribute towards infrastructure necessary for its acceptability although, in the interests of effectiveness, **MM17** is required to make clear that s106 agreements (or other mechanisms to secure infrastructure) will be required only for infrastructure which is not intended to be funded by Community Infrastructure Levy income. However, until CIL is in place in Ipswich, it is not feasible for the policy to indicate which infrastructure is envisaged to be funded by CIL and, thus, which will be funded by s106 agreements or other mechanisms. Policies CS18, CS19, DM4 and DM32 concern flood defence, health service provision and the

provision/protection of community facilities and align with national policy in these respects and are not in any way unreasonable.

123. Policy DM29 sets requirements for open space, sport and recreation facilities as part of new development. **MM34** is necessary in the interests of justification and effectiveness making clear that developments will not be required to provide for more than their own needs and that in high density developments of less than 40 dwellings on-site open space requirements will be applied flexibly if it can be demonstrated that compliance with the requirement would reduce the number of dwellings which can be delivered. The modification also provides for greater flexibility in the type of open space provision which will be required, reflecting that which has routinely been applied in development management decisions.
124. Policies SP6, SP7 and SP8 allocate and protect land for open space, leisure and community uses and an extension to Orwell Country Park. There is little to substantiate the suggestion that a new primary school at site IP258 (policy SP7) is not deliverable. Concern has been raised at the possibility of a new visitor centre facility at the County Park and its potential effects on the nearby Special Protection Area (SPA). However, policy SP8 is sound in identifying that the feasibility of this facility will be investigated including assessment of potential impacts on the SPA.
125. In conclusion, subject to **MM15 – MM17** and **MM34**, the plans set out policies for non-transport infrastructure and services which are positively prepared, justified, effective and consistent with national policy.

Issue 10 – Is the IP-One Area Action Plan positively prepared, justified, effective and consistent with national policy?

126. The IP-One Area consists of the central area of the borough incorporating the town centre, Waterfront (policy SP11), Education Quarter (policy SP12) and Ipswich Village (policy SP13) and it includes a wide range of existing uses – shopping, business, public administration, leisure, education and residential. In line with policy CS3, the plans include an Area Action Plan for the area which in general terms is supportive of a number of the NPPF's core planning principles, including supporting sustainable economic development, securing high quality design and conserving heritage assets, encouraging the effective use of land and focussing significant development in locations which are sustainable. The Area Action Plan overlaps considerably with the rest of the plans and includes policies SP10 – SP17. Policies SP10 and SP14 – SP17 are considered in detail in Issues 5 and 8 above, whilst policies SP11 – SP13 are positively-prepared approaches to development at the Waterfront, in the Education Quarter and in Ipswich Village. The Action Plan also identifies six Opportunity Areas (Island Site, Merchant Quarter, Mint Quarter, Education Quarter, Westgate, River and Princes Street Corridor) for which development opportunities and development principles are set out.
127. A number of specific aspects of the Action Plan have been criticised and these are either considered elsewhere in this report or below. However, there is little criticism of the overall approach of the IP-One Area Action Plan and it is, in

broad terms, a positively prepared and soundly based approach to development in the central area of Ipswich.

128. However, **MM52 – MM58** are necessary to modify the Opportunity Area Site Analyses, Development Options and lists of development opportunities and principles. These modifications update the Area Action Plan to reflect sites allocated in the Site Allocations plan and to appropriately reflect heritage constraints. In relation to the Island Site Opportunity Area concern is raised at the statement in the list of development opportunities that a maximum of 50% residential development will be permitted and that, generally, development will be low-medium rise (3-5 storeys). In the interests of effectiveness **MM53** is thus necessary for consistency with the clear statement in the supporting text of policy SP2 that the proportion of housing is indicative. However, the building heights requirement is soundly based having regard to the importance of maintaining views from the Waterfront to the wooded skyline which forms an important part of the setting of central Ipswich and bearing in mind that the "generally" wording provides for appropriate flexibility and that plans allow for taller buildings consistent with policy DM6.
129. Criticism is made of the impacts of past and future development proposals and flood defence measures on the River Orwell and the dock area. However, to the extent that these matters are relevant to the plans, there is not persuasive evidence to contradict the judgements of the Council, the Environment Agency and others or to demonstrate that the plans are unsound.
130. In conclusion, subject to **MM52 – MM58**, the IP-One Area Action Plan is positively prepared, justified, effective and consistent with national policy.

Other Matters

131. It has been contended that the SA does not sufficiently thoroughly appraise a range of impacts including, amongst others, water resources, climate change, agricultural land and transport effects. However, bearing in mind that the appraisal is of strategic level plans and that more detailed assessment of the effects of specific schemes (including potentially further Environmental Impact Assessment) will be required, I am satisfied that it is adequate. There is also disagreement with the SA's conclusions on specific impacts. Whilst this is understandable, given that there is often an inevitable degree of judgement in such assessments, its conclusions are, nonetheless, reasonable.
132. In relation to a number of matters it has been argued that the plans include inappropriate deference to the NPPF. However, consistency of the plans with national policy is a key tenet of soundness and legal compliance.
133. At a late stage in the Examination it was argued that the boundary of the Dumbarton Recreation Ground should be altered to reflect land ownership. However, private ownership of land does not necessarily preclude its use as a public facility and I have seen no evidence to indicate why, in planning terms, the boundary of the site is inappropriate.
134. MM41 and MM42, as advertised for consultation, concern amendments to the plans' glossary and a minor revision to Appendix 2 concerning saved policies.

These are not necessary for the soundness of the plans although, nonetheless, the Council may choose to make them as additional modifications to the plans. In response to the consultation on Main Modifications it has been stated that there are factual inaccuracies on Map 5 of the policies map relating to ecological sites of relevance to, but not specifically designated by, the plans. The Council can put in hand the necessary changes to Map 5 although in its current form it does not affect the soundness of the plans' policies.

Assessment of Legal Compliance

135. My examination of the compliance of the plans with the legal requirements is summarised in the tables below. I conclude that the plans meet them all.

LEGAL REQUIREMENTS - Core Strategy and Policies Development Plan Document Review	
Local Development Scheme (LDS)	The Ipswich Borough Council Core Strategy and Policies Development Plan Document Review has been prepared in accordance with the Council's LDS (October 2015).
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in March 2014. Consultation on the Local Plan and the MMs has complied with its requirements.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	Habitats Regulations Assessment has been carried out and is adequate.
National Policy	The plan complies with national policy except where indicated and MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The plan complies with the Act and the Regulations.

LEGAL REQUIREMENTS - Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document	
Local Development Scheme (LDS)	The Ipswich Borough Council Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document has been prepared in accordance with the Council's LDS (October 2015).
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in March 2014. Consultation on the plan and the MMs has complied with its requirements.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	Habitats Regulations Assessment has been carried out and is adequate.
National Policy	The plan complies with national policy except where indicated and MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

136. The plans have a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of them as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

137. The Council has requested that I recommend MMs to make the plans sound and capable of adoption. I conclude that with the recommended main modifications set out in Appendix 1, Appendix 2 and Appendix 2A the Ipswich Borough Council Core Strategy and Policies Development Plan Document Review and the Ipswich Borough Council Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document satisfy the requirements of Section 20(5) of the 2004 Act and meet the criteria for soundness in the National Planning Policy Framework.

Malcolm Rivett

INSPECTOR

This report is accompanied by Appendix 1, Appendix 2 and Appendix 2A containing the Main Modifications.

Appendix 1

IPSWICH BOROUGH COUNCIL LOCAL PLAN

Main Modifications to the Ipswich Borough Council Proposed Submission Core Strategy and Policies Development Plan Document Review

Key to the Main Modifications:

- Text in *italics* describes the Main Modification.
- Proposed additional text is shown as underlined. Proposed deleted text is shown as ~~struck through~~. Where unchanged text is included, it is to aid clarity only.
- Text shown as **bold** indicates that the text is a heading or a policy (as opposed to supporting text which is not in bold).
- CSR stands for Core Strategy Review.

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
CSR MM1	26	CS1 Policy and supporting text	<p><i>Delete clauses a. to j. and amend opening sentence accordingly:</i></p> <p>POLICY CS1: SUSTAINABLE DEVELOPMENT -CLIMATE CHANGE</p> <p>In Ipswich a comprehensive approach will be taken to tackling climate change and its implications through <u>the policies of this plan</u>.</p> <p>a. Requiring all new development to incorporate energy conservation and efficiency measures, to achieve significantly reduced carbon emissions for all new residential and major non-residential development;</p> <p>b. Requiring all major developments to achieve a target of at least 15% of their energy requirements to be provided through decentralised renewable or low carbon energy sources where feasible and viable;</p> <p>c. Seeking opportunities to develop renewable energy generating capacity including on Council-owned land and buildings;</p> <p>d. Supporting the implementation of the Suffolk Climate Action Plan produced by the Suffolk Climate Change Partnership and other appropriate local carbon reduction schemes;</p> <p>e. Implementing the IMPACT Carbon Management scheme and reducing carbon emissions from the Council's own operations;</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p>f. Supporting the protection, caring for and increase in canopy cover across the Borough during the plan period;</p> <p>g. Seeking opportunities to utilise parks and open space and ecological networks potential in the mitigation and adaptation against climate change;</p> <p>h. Supporting the implementation of the Ipswich Flood Defence Strategy by the Environment Agency;</p> <p>i. Requiring building and infrastructure design to incorporate water conservation, capture, recycling and efficiency measures and sustainable drainage systems (SuDS); and</p> <p>j. Supporting the implementation of Travel Ipswich to promote 15% modal shift to reduce carbon emissions.</p> <p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <ul style="list-style-type: none"> • Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or • Specific policies in that Framework indicate that development should be restricted¹. <p><i>Delete paragraphs 8.17 and 8.18:</i></p>

¹ For example those policies relating to sites protected under the Birds and Habitats Directives (NPPF paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Local Green Space; and Area of Outstanding Natural Beauty; designated heritage assets and locations at risk of flooding or coastal erosion.

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p data-bbox="562 308 1798 464">8.17 The carbon reduction and climate adaptation scheme, Suffolk Climate Change Partnership, is a partnership project with Suffolk County Council and others to help with information sharing, advice and practical measures so that individuals and businesses can reduce their carbon emissions and adapt to a changing climate. This is an essential strand of the strategy in tackling existing buildings and helping people to choose more sustainable lifestyles.</p> <p data-bbox="562 499 1798 679">8.18 The IMPACT Carbon Management Plan sets out how Ipswich Borough Council will achieve carbon reductions from its own operations. Against a 2007/08 baseline the Council has achieved a 21% reduction by March 2014 against a target of 20% set by the Council in March 2012. The Council also signed the Nottingham Declaration on Climate Change in 2008. The Council applies the Ipswich Standard to its own dwelling stock. The standard includes the provision of energy efficient boilers, double-glazing and insulation.</p> <p data-bbox="562 722 1798 786"><i>Amend paragraphs 8.19-8.21 and 8.23-8.24 to indicate where other policies of the Plan relate to aspects of climate change:</i></p> <p data-bbox="562 826 1798 1015">8.19 A combination of the measures set out <u>through the Development Management policies</u> will help to achieve overall carbon reduction at least in line with national targets. The Climate Change Act 2008 calls for at least 26% reductions from 1990 levels to be achieved by 2020. The Suffolk Climate Change Action Plan 2012 takes this a step further and sets a target of 60% reductions from 2004 levels, by 2025. 2004 is the first year for which there is a full set of emissions data for Suffolk and therefore may prove more practical for monitoring purposes.</p> <p data-bbox="562 1054 1798 1370">8.20 Many buildings in Ipswich are at risk of flooding, some from tidal surges and many from heavy rain. This risk will continue to grow as a result of rising sea levels and increasingly heavy rainstorms that can overwhelm drainage systems and cause localised flooding unless mitigation measures are implemented. At the strategic scale, tidal flood risk will be tackled through the completion of the Ipswich Flood Defence scheme including a tidal surge barrier <u>(this is addressed through policy CS18)</u>. However developments located within the flood plain will still need to address residual risk in accordance with the National Planning Policy Framework (e.g. the risk of defences failing). Managing surface water run-off is also important. SuDS, rainwater harvesting, storage and where appropriate the use of green roofs or water from local land drainage will be required wherever practical. Such approaches shall be particularly mindful of relevant ecological networks. New buildings need to be more</p>

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			<p>adaptable and resilient to climate change effects in future. <u>This is taken forward through policy DM4.</u></p> <p>8.21 The Haven Gateway Water Cycle Study Stage 1 Report identified issues with water supply and sewerage in Ipswich. It advised that sustainable drainage and other demand management techniques are used to manage water demand and surface water run-off in the Borough. The Council's Drainage and Flood Defence policy DFD10 has required SuDS wherever reasonable practicable since 2002². In addition the Council has a surface water management plan and a strategic flood risk assessment, and there is also a Suffolk local flood risk management strategy and catchment flood management plan, and a National strategy for SuDS, all of which are referred to in the Council's Development and Flood Risk supplementary planning document (September 2013 <u>and updated January 2016</u>).</p> <p><i>(8.22 is unchanged)</i></p> <p>8.23 There can be a multitude of benefits: for the climate, for people and for wildlife. Wood is a smart choice - timber is renewable and can replace other materials that require much larger fossil fuel inputs for their production. It can also replace fossil fuels directly in the form of renewable energy, or wood fuel. Trees can help Ipswich to adapt to a changing climate by intercepting rain in heavy rainstorms and to help alleviate flooding, moderate local microclimates – urban areas with trees are cooler in summer and warmer in winter, and help tackle the urban heat island effect, as well as creating a valuable wildlife habitat. Ipswich's canopy cover and health care needs is changing. The Council aims to help the Borough's canopy cover to adapt and become resilient to the changing climate. Canopy cover and arboriculture can be an important and attractive part of the solution in Ipswich <u>and this is taken forward through policy DM10.</u></p> <p>8.24 Green spaces and functioning ecosystems help in adapting to the extremes of climate change. Green areas in the Borough have less of a heat island effect than built-up areas providing opportunities for people to keep cool in hot weather. Green spaces also improve air quality contributing to reduced ground-level ozone, fine particulates and respiratory irritants. Functional ecosystem can also mitigate the risks associated with downstream flooding from extreme rainfall events. In recent years there is also an upsurge in 'growing your own' food on allotments that helps reduce the miles food travels. From mitigating the effects of climate change to improving health, parks and green spaces play a vital part in Ipswich. <u>Open space protection and provision is taken forward through policies CS16, DM28 and DM29.</u></p>

² Ipswich Borough Council Drainage and Flood Defence policy (May 2002, updated August 2009)

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CSR MM2	30	CS2 Policy and supporting text	<p><i>Amend CS2 clause b. about joint working; delete clause e. referring to Futura Park strategic employment site; and add reference in the final paragraph to maximising the use of previously developed land:</i></p> <p>The regeneration and sustainable growth of Ipswich will be achieved through:</p> <ul style="list-style-type: none"> a. Focusing new residential development and community facilities into the town centre, the Waterfront, Ipswich Village, and Ipswich Garden Suburb and into or within walking distance of the town's district centres, and supporting community development; b. Later in the plan period, wWorking with neighbouring authorities to address housing need within the Ipswich housing market area; c. Focusing major new retail development into the Central Shopping Area; d. Focusing new office, hotel, cultural and leisure development into Ipswich town centre; e. Promoting a strategic employment site at Futura Park, Nacton Road, to support economic development and jobs growth; f. Directing other employment uses (B1 (except office), B2 and B8) to employment areas distributed in the outer parts of the Borough, and there will be a town centre first approach to the location of offices; g. Dispersing open space based (non-commercial) leisure uses throughout the town with preferred linkage to ecological networks and/or green corridors, and protecting the countryside from inappropriate development; and h. Development demonstrating principles of very high quality architecture and urban design and which enhances the public realm. <p>A sustainable urban extension to north Ipswich is planned subject to the prior provision of suitable infrastructure (see policy CS10).</p>

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			<p>Major developments within the town centre, Ipswich Village, and district centres should incorporate a mix of uses to help achieve integrated, vibrant and sustainable communities. Major developments (for the purposes of this policy) are defined as commercial developments of 1,000 sq. m or more or residential developments of 10 dwellings or more. Exceptions may be made for large offices or education buildings for a known end user.</p> <p><u>In the interests of maximising the use of previously developed land, development densities will be high in the town centre, Ipswich Village and Waterfront, medium in the rest of IP-One and in and around the district centres, and low elsewhere, where it does not compromise heritage assets and the historic character of Ipswich.</u></p> <p><i>Amend 8.32 accordingly:</i></p> <p>8.32 The approach to locating employment uses focuses office activity into the town centre, in accordance with the National Planning Policy Framework, to support its vitality and viability. It also provides a strategic employment site, located where it can build on the success of Ransomes Europark. It directs other employment uses, particularly B2 and B8 uses, which tend to be more extensive and less suited to central locations, to the town's outlying employment areas. These are accessible from residential areas, yet sufficiently segregated from them to minimise the possibility of conflicts between residential uses and potentially noisy or odorous industrial activities. The boundaries of employment areas are delineated on the policies map.</p>
CSR MM3	34	CS4 Supporting text only – various paragraphs	<p><i>Update the description of Ipswich's heritage in 8.42:</i></p> <p>8.42 Ipswich has a rich and varied heritage of built, historical and natural assets, including more square miles of park per thousand population than anywhere else in the UK. The Borough contains:</p> <ul style="list-style-type: none"> • Over 600 listed buildings and structures; • 44 <u>15</u> conservation areas; <p><i>Amend 8.45-8.46 to clarify the national context:</i></p> <p>8.45 Most of the built, historical <u>historical</u> heritage and natural assets are protected by one or more pieces of</p>

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			<p>legislation, policy documents or circulars, including:</p> <ul style="list-style-type: none"> • EU Habitats Directive; • Wildlife and Countryside Act 1981; • The National Parks and Access to the Countryside Act 1949; • Countryside and Rights of Way Act 2000; • Ramsar Convention on Wetlands; • Hedgerows Regulation 1997; • Plant Health Act 1967 and orders; • Forestry Act 1981; • Natural Environment and Rural Communities Act 2006; • The Town and Country Planning Act 1990; • Planning (Listed Buildings and Conservation Areas) Act 1990; • Ancient Monuments and Archaeological Areas Act 1979; • National Heritage Act 1983; • The National Planning Policy Framework (2012) <u>and Planning Practice Guidance (2014)</u>; • The Localism Act 2011; and • Government Circular 1/01 • Water Framework Directive. <p>8.46 This framework of legislation, guidance and policy currently provides comprehensive protection for the assets. Considering first listed buildings, the <u>The Council will take the following approach to heritage assets:</u></p> <ul style="list-style-type: none"> • Conserve and enhance the significance of the Borough’s heritage assets, their setting and wider townscape in accordance with policy DM8; • Require new development to contribute to local distinctiveness, built form and scale of heritage assets through the use of appropriate design and materials; • Require proposals to demonstrate a clear understanding of the significance of the asset and its wider context, and the potential impact of the development on the heritage asset and its context; • Keep under review potential buildings and structures for statutory protection; and • Prepare and review entries for the joint Suffolk LPA Buildings at Risk register. <p>Local policy is also provided through policy DM8 Heritage Assets and Conservation. However, national policy has been consolidated into the National Planning Policy Framework with the Historic Environment Planning Practice Guidance produced by Historic England remaining applicable to ensure that policy and</p>

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			<p>guidance are properly inter-related and that listed buildings, conservation areas and other heritage assets will be adequately protected as at present. As the Historic England guidance is described as a 'living draft' and has been the subject of a draft revision to coincide with the NPPF, the <u>The National Planning Policy Framework sets out the Government's planning policies for England. This is supported by the National Planning Practice Guidance which is a web based resource published by Government, and also by the Good Practice Advice Notes (GPA) produced by Historic England in collaboration with the Historic Environment Forum. Historic England also publish Historic England Advice Notes on specific topic matters providing advice to those engaged in planning matters. The Council is preparing a supplementary planning document to protect the special local distinctiveness of Ipswich heritage assets if necessary (the Urban Character Supplementary Planning Document).</u></p> <p><i>Amend 8.48 to refer to promoting heritage assets:</i></p> <p>8.48 All conservation areas have been the subject of detailed Conservation Area Character Appraisals. Those for areas designated by 1994 were the subject of public consultation and Council approval during 1994-95. Subsequently three additional conservation areas were declared in 1995, 2003 and 2005 for which appraisals were also prepared. Periodic reviews of all conservation areas are required by heritage legislation and these have been undertaken at approximately five yearly intervals since 1994 involving a review of boundaries, the descriptive content of the appraisals and the area specific policies and proposals. The Local Plan anticipates major change in or adjacent to parts of the Central Conservation Area but this is not expected or proposed to the same extent for the remainder of conservation areas. <u>Promoting heritage assets through development could, for example, include provision of heritage information around a site whilst archaeological assessments are underway.</u></p> <p><i>Amend 8.53 to add information on Scheduled Monuments:</i></p> <p>8.53 Scheduled Monuments are designated by the Secretary of State <u>for Culture, Media and Sport under the Ancient Monuments and Archaeological Areas Act, 1979. Historic England administers and manages the scheduling and Scheduled Monument Consent process and advises the Secretary of State in making decisions. Scheduled monuments can be found on the National Heritage List for England, which is searchable online.</u>who must approve any works that might affect them, having consulted Historic England as the body responsible for national policies on their maintenance and recording. Proposals affecting designated and non-designated Ipswich heritage assets should be informed by the Historic Environment Record for Suffolk maintained by the County Council which is also consulted on planning applications that could affect archaeology. Ipswich's archaeological legacy is important in helping to tell</p>

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			<p>the town's story and will therefore be protected and managed in accordance with the NPPF and policies CS4 and DM8. Central Ipswich is an Area of Archaeological Importance, for which a development management approach is set out in policy DM8. An Urban Archaeological Database for Ipswich is to be prepared. The Council will prepare a supplementary planning document to summarise information from the Ipswich Urban Archaeological Database and set out archaeological considerations for new developments.</p> <p><i>Amend 8.55 to add reference to the NPPF:</i></p> <p>8.55 Historic England also has a role registering historic parks and gardens. Whilst registration offers no additional statutory protection, they are designated heritage assets of considerable significance and an important material consideration in development management. <u>Decisions about proposed development which would harm the significance of a designated heritage asset will be taken having regard the NPPF.</u></p> <p><i>Amend 8.58 to remove reference to Code for Sustainable Homes and add reference to Historic England advice:</i></p> <p>8.58 The Council will encourage the conservation and efficient use of natural resources in order to work towards sustainable 'one planet' living in Ipswich. This will be implemented through a <u>the development management policy DM1</u> in Part C of this document that applies the framework provided by the Code for Sustainable Homes and BREEAM rating, subject to any forthcoming Government changes to the Code. <u>Historic England publishes advice on the application of Part L of the Building Regulations to historic and traditionally constructed buildings.</u> In addition, new development will be required to minimise waste generated.</p>
CSR MM4	39	CS6 Policy and supporting text	<p><i>Amend paragraph 8.68 to explain the relationship between the Ipswich Policy Area, the Ipswich Housing Market Area and Ipswich Functional Economic Area:</i></p> <p>8.68 This has long been recognised within the former Suffolk Structure Plan via the identification of the 'Ipswich Policy Area'. The Ipswich Policy Area consists of parts of the areas of Suffolk County Council, Babergh District Council, Mid Suffolk District Council and Suffolk Coastal District Council and the whole of Ipswich Borough's area, and the Ipswich Policy Area Board consists of councillors</p>

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			<p>and is a key vehicle for cross boundary planning. The boundary of the Ipswich Policy Area is mapped at Appendix 3 for information. The boundary is currently being reviewed and it is possible that a wider Ipswich Policy Area will be more appropriate. Any new boundary would need to be given statutory weight through the production of future Local Plans. <u>The Ipswich Policy Area sits within the wider Ipswich Housing Market Area and Ipswich Functional Economic Area, both of which cover the whole of the four planning authority areas.</u></p> <p><i>Amend CS6 to reflect Duty to Cooperate discussions and commit to the preparation of joint or aligned local plans:</i></p> <p>Ipswich Borough Council recognises the importance of joint working and the coordination of planning policies around the fringes of Ipswich, in order to deliver appropriate development. It will achieve this in a variety of ways:</p> <p>a. Formal working through the Ipswich Policy Area Board or other relevant forums and developing a jointly agreed strategy;</p> <p>b. a. Joint working on Local Plan evidence gathering, monitoring and updating, to ensure a consistent approach; and</p> <p><u>b. The production of joint or aligned local plans; and</u></p> <p>c. Joint working to develop shared approaches <u>to delivery</u>, such as that for strategic green infrastructure and strategic development sites.</p> <p>The preparation of joint or aligned development plan documents is is to be explored, to ensure a coordinated approach to meeting the objectively assessed housing needs of the Ipswich housing market area and achieving economic growth.</p> <p><i>Amend paragraph 8.70 to set out a timetable for work on joint or aligned plans:</i></p> <p>8.70 The Council recognises the importance of joint working on Ipswich Policy Area matters. At present this is <u>Previously this has been achieved through joint working on evidence base documents to inform development plan documents.</u> In the future, the preparation of joint or aligned development</p>

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			<p>plan documents is to be explored. However, in order to address the constraints to meeting development needs in Ipswich Borough, due to the constrained nature of the boundary, there is a need to work on joint or aligned local plans with neighbouring authorities. Work is to commence on Issues and Options in 2016 with the aim of having the plans adopted by 2019. The preparation of joint or aligned development plan documents will ensure a coordinated approach to meeting the objectively assessed housing needs of the Ipswich housing market area and achieving economic growth.</p>
CSR MM5	40	CS7 Introductory text	<p><i>Amend the policy and supporting text to clearly set out a minimum housing requirement and the Council's approach to delivering housing. As the text has been significantly amended, the entire policy and supporting text is included for clarity:</i></p> <p>8.76 The Council previously had an adopted target to allocate land to accommodate at least 14,000 additional residential dwellings between 2001 and 2021 (at 700 dwellings per annum) and a further 700 dwellings per annum thereafter to 2027. Following updated population and household projection modelling work, the Council has an objectively assessed housing need of 13,550 dwellings at 677 dwellings per annum between 2011 and 2031. This plan covers the period 2011 to 2031 and the Council has identified an interim housing requirement of at least 9,777 dwellings (at 489 dwellings per annum) based upon the anticipated housing supply within the Borough. However, taking account of household forecasts, up to date evidence on market signals, the need for affordable housing and increased future migration from London, the Objectively Assessed Need for new housing in Ipswich could be substantially more. It is recognised there is an urgent need to work with neighbouring authorities to produce an up to date Objectively Assessed Need for the Housing Market Area and joint or aligned plans to deliver it. However given the capacity constraints of housing land supply in the Borough, there will be a need to engage with neighbouring authorities through the Ipswich Policy Area to meet future population and household needs.</p> <p>8.77 Since 2001 various developments have been built or received planning permission and 6,903 dwellings were completed between 2001 and 2011. A number of developments continue to have unimplemented planning permissions and some remain under construction. Therefore, the number of dwellings that the Council will need to allocate land for through the Local Plan process is fewer than 13,550 required to 2031. However, capacity constraints in the Borough mean that, currently,</p>

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			<p><u>sufficient suitable, deliverable and available land to deliver significantly more than 9,777 dwellings cannot be met within the Council's administrative area. In these circumstances, rather than delay adoption of this plan whilst an updated Objectively Assessed Need for housing within the Ipswich Housing Market Area is identified, this additional work will be undertaken post-adoption as part of the production of joint or aligned local plans or a new strategic plan. Joint working is taking place through the production of joint or aligned local plans being prepared by Ipswich Borough Council, Babergh/Mid Suffolk District Councils and Suffolk Coastal District Council, to conclude by 2019. Publication (under Regulation 19 of the Town and Country Planning (Local Planning (England Regulations) 2012) of the plan(s) in 2018 aligns with the timescales set out in the Council's Local Development Scheme. This joint working has the support of the Ipswich Policy Area Board and a Memorandum of Understanding was signed in May/June 2016 by the local planning authorities and Suffolk County Council. Alternative potential mechanisms are also emerging. Work has begun on a Suffolk-wide Strategic Planning and Infrastructure Framework, which is at an early stage. The Government's announcement on 16th March 2016 included the devolution of strategic planning powers to an East Anglia Combined Authority, which would represent a further alternative mechanism for strategic planning.</u></p> <p>(new paragraph number) Table 2 below sets out the housing land supply and <u>minimum</u> requirement figures as at April 2014 2015, looking forward to 2031.</p> <p>TABLE 2 HOUSING LAND SUPPLY AND <u>MINIMUM</u> REQUIREMENT AT APRIL 2014 2015</p> <table border="1" data-bbox="577 1082 1812 1329"> <thead> <tr> <th data-bbox="577 1082 669 1161"></th> <th data-bbox="669 1082 1093 1161"></th> <th data-bbox="1093 1082 1339 1161">Number of dwellings</th> <th data-bbox="1339 1082 1576 1161">Discounted Numbers</th> <th data-bbox="1576 1082 1812 1161">Cumulative Numbers</th> </tr> </thead> <tbody> <tr> <td data-bbox="577 1161 669 1329">1</td> <td data-bbox="669 1161 1093 1329">Dwellings completed between 2011 and 2015</td> <td data-bbox="1093 1161 1339 1329">4,077* <u>1,081*</u></td> <td data-bbox="1339 1161 1576 1329">-</td> <td data-bbox="1576 1161 1812 1329">4,077 <u>1,081</u></td> </tr> </tbody> </table>			Number of dwellings	Discounted Numbers	Cumulative Numbers	1	Dwellings completed between 2011 and 2015	4,077* <u>1,081*</u>	-	4,077 <u>1,081</u>
		Number of dwellings	Discounted Numbers	Cumulative Numbers									
1	Dwellings completed between 2011 and 2015	4,077* <u>1,081*</u>	-	4,077 <u>1,081</u>									

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			2	Dwellings under construction	704 <u>705</u>	-	1,781 <u>1,786</u>
			3	Dwellings with planning permission	820 <u>914</u>	738 <u>823</u>	2,519 <u>2,609</u>
			4	Dwellings with a resolution to grant planning permission (subject to the prior completion of a Section 106 agreement)	916	824	3,343 <u>3,433</u>
			5	Number of dwellings required on new site allocations, in a broad location and on windfall sites to 2031	10,207 <u>6,344</u>		13,550 <u>9,777</u>
<p>TABLE NOTES</p> <p>The discounted numbers in the table allow 10% slippage for planning permissions that may not be implemented.</p> <p><i>Line 1: Actual numbers of dwellings built between 1st April 2011 and 31st March 2015. *Includes 120 <u>124</u> Assisted Living dwellings.</i></p> <p><i>Line 2: Dwellings under construction at 31st March 2015 - assumed that all will be completed over the plan period.</i></p> <p><i>Line 3: Other dwellings with planning permission at 31st March 2015 - assumed that 10% of these will</i></p>							

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p><i>not be completed.</i></p> <p><i>Line 4: Dwellings with a resolution to grant planning permission from the Council's Planning and Development Committee but which are awaiting completion of a Section 106 Agreement before planning permission is issued, at 31st March 2015 - assumed that 10% of these will not be completed.</i></p> <p><i>Line 5: To reach the local target of 13,550 interim minimum requirement of 9,777 dwellings by 2031, together with windfall sites, further land will need to be allocated within the Borough, and other locations within the Ipswich Policy Area identified with neighbouring authorities later in the plan period, for at least 10,207 6,344 new homes.</i></p> <p>8.78 National guidance in the National Planning Policy Framework, is that Local Planning Authorities should set out their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption of the relevant development plan document.</p> <p>8.79 This should include identifying a specific supply of developable sites for years 1-10 from adoption and, where possible, for years 11-15. Where it is not possible to identify specific sites for years 11-15, broad locations for future growth should be indicated. In the case of Ipswich this will be within the Borough boundary at this stage but future continuing discussions will be <u>are</u> required with neighbouring authorities within the Ipswich Policy <u>Housing Market Area</u> due to capacity constraints. Windfall sites will also contribute to the housing supply and these are defined in the National Planning Policy Framework as sites not specifically identified as available in the Local Plan process and normally comprise previously-developed sites that have unexpectedly become available.</p>
CSR MM6	42	CS7 Policy and supporting text	<p><i>Amend policy CS7 to set out clear minimum interim housing target:</i></p> <p>POLICY CS7: THE AMOUNT OF NEW HOUSING REQUIRED</p> <p>The Council will endeavour to enable housing delivery to meet its objectively assessed housing need throughout the plan period. The Council will allocate land to provide for at</p>

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			<p>least an additional 5,429 dwellings net in the Borough, with a lower amount of 4,629 expected by 2031 to account for a long build out period for the development of the Ipswich Garden Suburb. Sites will be identified through the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document in accordance with the spatial strategy in this Core Strategy, in addition to the land allocated at the Ipswich Garden Suburb.</p> <p>The Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the plan period.</p> <p>To meet the remaining requirement of 5,578 dwellings to 2031, the Council will rely on windfall sites and will work with neighbouring local authorities to address housing need later in the plan period.</p> <p><u>A) The Council has an interim housing target of at least 9,777 dwellings for the period 2011 – 2031. This equates to an interim annual target of at least 489 dwellings. The Council will, with its neighbours, prepare an updated Objectively Assessed Need for the Ipswich Housing Market Area and draft strategy options for the distribution of development to meet that need in the Ipswich Housing Market Area by spring 2017. The results of the joint working will take the form of a joint or aligned local plan review, supported by the production of a Suffolk-wide planning framework. Policy CS7 will be reviewed as part of this joint working.</u></p> <p><u>B) Due to the constrained nature of the Borough, it is currently anticipated that not significantly more than 9,777 dwellings (489 dwellings per annum) can be delivered to 2031. Based upon this capacity, the Council will secure the delivery of housing of at least 489 dwellings per year within the Borough. Since the start of the plan period 3,433 dwellings have been completed, are under construction, have planning permission or have a resolution to grant planning permission subject to a s106 agreement.</u></p> <p><u>The Council will additionally allocate land to provide for at least 5,344 dwellings (net) in the Borough, with a lower amount of 4,544 expected by 2031 to account for a long build out period for the development of the Ipswich Garden Suburb. The Ipswich Garden Suburb development will contribute significantly to meeting the housing needs of the Borough throughout the plan period. Sites are identified through the Site Allocations and</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p><u>Policies (incorporating IP-One Area Action Plan) Development Plan Document in accordance with the spatial strategy in this Core Strategy, in addition to the land allocated at the Ipswich Garden Suburb. 1,800 dwellings are expected to be delivered on windfall sites between 2016 and 2031.</u></p> <p><u>C) The Council is currently unable to demonstrate a five year supply against the interim housing target of at least 9,777 dwellings, in terms of paragraph 47 of the National Planning Policy Framework. In the absence of a five year supply of housing within the Borough, the Council will adopt a positive approach to appropriate new housing developments which may come forward on sites not allocated for housing in accordance with policies DM25 and DM34. Nonetheless policies that ensure well-designed dwellings which provide good living conditions for their residents remain important and will remain relevant to determining what is an appropriate housing development.</u></p> <p>8.80 Table 2 shows that, as a result of housing completions between 2011 and 2015, 12,473 dwellings remain to be delivered between 2015 and 2031 in order to meet the requirement. Due to the constrained nature of the Borough boundary, the Council is actively working with neighbouring authorities to produce an updated Objectively Assessed Need for the Ipswich Housing Market Area and joint or aligned Local Plans to deliver it.</p> <p>8.81 Within the Borough, sites will be allocated through the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document, having regard to the strategy set out within this document and in CS10. The Council has undertaken an update to the 2010 Strategic Housing Land Availability Assessment (SHLAA) and is satisfied that sites within the Borough are capable of being delivered, delivering the housing requirement in the ten years to 2025. The SHLAA will be periodically updated.</p> <p>8.82 The phasing of housing sites will be informed by the findings of the SHLAA, infrastructure delivery and the preparation of master plans. The SHLAA informs the Council's housing trajectory. It is based on recent contact with developers and landowners. It is from this potential supply that site allocations are drawn. Within the tightly drawn boundary of Ipswich, options for the housing land supply are inevitably limited, hence the need to consider future development opportunities beyond the Borough boundaries. Table 3 below provides a breakdown of the housing land supply whilst Table 4 provides a breakdown by delivery period. Delivery will be monitored closely through the Council's Authority Monitoring Report.</p>

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			<p>8.83 In working with neighbouring authorities to address housing need later in the plan period, consideration will need to be given to avoiding or minimising effects in these areas including environmental designations, landscape, townscape and historic assets. This policy supports plan objective 3.</p> <p>TABLE 3 ESTIMATED HOUSING DELIVERY FOR 2014 2015-2031 EXCLUDING CURRENT PERMISSIONS AS AT 1ST APRIL 2014 2015</p> <table border="1" data-bbox="680 560 1809 1378"> <thead> <tr> <th data-bbox="680 560 1274 756">Area of Ipswich</th> <th data-bbox="1274 560 1538 756">%age (dwellings) Previously developed land</th> <th data-bbox="1538 560 1809 756">Total Additional dwellings 2014 <u>2015-2031</u></th> </tr> </thead> <tbody> <tr> <td data-bbox="680 756 1274 887">IP-One</td> <td data-bbox="1274 756 1538 887">100%</td> <td data-bbox="1538 756 1809 887">4,122 <u>1,122</u></td> </tr> <tr> <td data-bbox="680 887 1274 1249">Rest of built up area</td> <td data-bbox="1274 887 1538 1249">75.2% <u>72.3%</u></td> <td data-bbox="1538 887 1809 1249">807 (PDL: 607) <u>722 (PDL: 522)</u></td> </tr> <tr> <td data-bbox="680 1249 1274 1378">Ipswich Garden Suburb (see policy CS10)</td> <td data-bbox="1274 1249 1538 1378">0%</td> <td data-bbox="1538 1249 1809 1378">2,700</td> </tr> </tbody> </table>	Area of Ipswich	%age (dwellings) Previously developed land	Total Additional dwellings 2014 <u>2015-2031</u>	IP-One	100%	4,122 <u>1,122</u>	Rest of built up area	75.2% <u>72.3%</u>	807 (PDL: 607) <u>722 (PDL: 522)</u>	Ipswich Garden Suburb (see policy CS10)	0%	2,700
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			Total 2014 2015-2031 (excluding windfall and broad locations)	37.4% <u>36.2%</u>	4,629 (PDL: 1,729) <u>4,544 (PDL: 1,644)</u>
			Small windfall sites (fewer than 10 dwellings) 2015 <u>2016</u> -2031	90%	900 (PDL: 810) 900 (PDL: 810)
			Large windfall sites (10 or more dwellings) 2020 <u>2021</u> -2031	90%	900 (PDL: 810)
			Residual need later in plan period	0%	3,778
			Total 2014 <u>2015</u>-2031	32.8% <u>51.5%</u>	10,207 (PDL: 3,349) <u>6,344 (PDL: 3,264)</u>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification												
			<p>TABLE 4 ESTIMATED HOUSING DELIVERY AND PREVIOUSLY DEVELOPED LAND (PDL) TRAJECTORY (INCLUDING SITES WITH PLANNING PERMISSION AND UNDER CONSTRUCTION BUT NOT INCLUDING WINDFALL SITES)</p> <table border="1"> <thead> <tr> <th>Time period</th> <th>2001- 2011</th> <th>2011-2015</th> <th>2015-2031</th> </tr> </thead> <tbody> <tr> <td>Housing Delivery</td> <td>6,903</td> <td>1,077* <u>1,081*</u></td> <td>6,904 <u>6,896</u></td> </tr> <tr> <td>PDL%</td> <td>94.5%</td> <td>79% <u>81.9%</u></td> <td>52.3% <u>52.2%</u></td> </tr> </tbody> </table>	Time period	2001- 2011	2011-2015	2015-2031	Housing Delivery	6,903	1,077* <u>1,081*</u>	6,904 <u>6,896</u>	PDL%	94.5%	79% <u>81.9%</u>	52.3% <u>52.2%</u>
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CSR MM7	45	CS8 Policy and supporting text	<p><i>Add reference to the Housing Needs Study or Strategic Housing Market Assessment (SHMA) being up to date; re-order the clauses a. to c. to put need first; and add guidance about affordable housing mix moved from the deleted policy DM24:</i></p> <p>The Council will plan for a mix of dwelling types to be provided, in order to achieve mixed and sustainable communities. All major schemes over 10 dwellings will be expected to provide a mix of dwelling types and sizes in accordance with the Council’s Housing Needs Study and Strategic Housing Market Assessment <u>where they remain up to date.</u></p> <p>Exceptions to this approach will only be considered where:</p> <p>a. The site location, characteristics or sustainable design justify a different approach; or</p> <p>b. <u>a.</u> A different approach is demonstrated to better meet housing needs in the area; or</p>												

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p style="text-align: center;"><u>b. The site location, characteristics or sustainable design justify a different approach;</u> <u>or</u></p> <p style="text-align: center;">c. A different approach would expedite the delivery of housing needed to meet targets and is acceptable in other planning terms.</p> <p style="text-align: center;">The Council will support Self Build, Custom Build and Co-Housing developments for residential accommodation in appropriate locations, in the interests of supporting high quality homes which meet the identified needs of the Borough.</p> <p style="text-align: center;"><u>For affordable housing provision, the most appropriate type, size and mix for each development will be guided by the Council's Affordable Housing Position Statement, where it remains up to date, and the particular characteristics of the site.</u></p> <p><i>Add text to paragraph 8.89 to refer to the SHMA being up to date:</i></p> <p>8.89 A balance of types of properties is needed across the plan period, rather than a significant majority of one type at one time. The approach set out in this policy will help to ensure a variety of provision. <u>The Strategic Housing Market Assessment (SHMA) is reviewed approximately every three years. It analyses forecast household growth by characteristics such as age and size, and considers the existing housing stock. Whether it is up to date will be considered in relation to when it was prepared and any significant changes in the market since its preparation.</u></p>
CSR MM8	47	CS9 Policy and supporting text	<p><i>Delete the entire policy as it could have been misinterpreted as a development management policy whereas in fact it has been used to guide the site allocations process:</i></p> <div style="text-align: center; background-color: #d4edda; padding: 10px;"> <p>POLICY CS9: Previously Developed Land</p> </div> <p>8.98 The Government encourages the use of previously developed land known as brownfield land through the National Planning Policy Framework and enables local planning authorities to consider</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p>setting locally appropriate targets.</p> <p>POLICY CS9: PREVIOUSLY DEVELOPED LAND</p> <p>The Council will focus development on previously developed land first while recognising that greenfield land will need to be developed to meet its objectively assessed housing need and forecasted jobs growth. This reflects the locational strategy set out in policy CS2, which focuses development primarily into central Ipswich. It will in turn be reflected in site allocations made in the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.</p> <p>8.99 — Between 2011 and 2014 73% of new residential development in Ipswich took place on previously developed land. The Council is proud of its very strong record in this area. However, as previously developed sites become redeveloped and regenerated, it will become more difficult to sustain this proportion of development on previously developed land over the plan period. The twin approach adopted of urban regeneration plus greenfield urban extension ensures that the Council can address its objectively assessed housing need.</p> <p>8.100 — In terms of employment development, between 2001 and 2014, quite a high proportion has taken place on greenfield land, largely because of the role that Ransomes Europark has played in meeting demand. This will decline now as Ransomes Europark nears completion. Of the Borough's employment land supply at April 2014 the majority the supply is on previously developed land, except the remaining land at Ransomes Europark, land north of Whitton Lane and land at Airport Farm Kennels.</p> <p>8.101 — It does not necessarily follow that previously developed land is less biodiverse than greenfield land. For example, in some instances former industrial processes can create conditions suitable for certain communities of plants and animals to flourish that would not normally be found in such a locality. Therefore policy DM31 will apply to all sites.</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification														
CSR MM9	48	CS10 - policy	<p data-bbox="562 272 1798 336"><i>Amend CS10 to refer to the neighbourhoods by name; remove reference to triggers in Table 8B; and add reference to the affordable housing requirement of 31%;</i></p> <p data-bbox="658 379 1765 472">Land at the northern fringe of Ipswich, which is referred to as Ipswich Garden Suburb, will form a key component of the supply of housing land in Ipswich during the plan period due to the limited availability of previously developed land.</p> <p data-bbox="658 507 1798 695">The site, identified on the policies map, consists of 195ha of land which will be developed comprehensively as a garden suburb of three neighbourhoods: <u>Henley Gate</u> a Northern neighbourhood (east of Henley Road and north of the railway line), <u>Fonnereau</u> a Southern neighbourhood (west of Westerfield Road and south of the railway line) and <u>Red House</u> an Eastern neighbourhood (east of Westerfield Road). Over the plan period, the site will deliver land uses as set out below:</p> <table data-bbox="658 735 1704 1372"> <thead> <tr> <th data-bbox="658 735 1317 762">Land use</th> <th data-bbox="1328 735 1704 762">Approximate area in hectares</th> </tr> </thead> <tbody> <tr> <td data-bbox="658 802 1317 863"><u>Public open space, sport and recreation facilities including dual use playing fields</u></td> <td data-bbox="1424 802 1458 826">40</td> </tr> <tr> <td data-bbox="658 898 1317 959">A Country Park (additional to the public open space above)</td> <td data-bbox="1424 898 1626 922">24.5 (minimum)</td> </tr> <tr> <td data-bbox="658 994 1317 1054">Residential development of approximately 3,500 dwellings</td> <td data-bbox="1424 994 1525 1018">402 <u>100</u></td> </tr> <tr> <td data-bbox="658 1090 1317 1150"><u>A District Centre located within Fonnereau Neighbourhood, providing:</u></td> <td data-bbox="1424 1090 1458 1114">3.5</td> </tr> <tr> <td data-bbox="860 1185 1357 1310"> <ul style="list-style-type: none"> <li data-bbox="860 1185 1357 1310">i. A maximum of 2,000 sq m net of convenience shopping, to include a medium/large supermarket between 1,000 and 1,700 sq m net; </td> <td></td> </tr> <tr> <td data-bbox="860 1345 1357 1372"> <ul style="list-style-type: none"> <li data-bbox="860 1345 1357 1372">ii. Up to 1,220 sq m net of comparison </td> <td></td> </tr> </tbody> </table>	Land use	Approximate area in hectares	<u>Public open space, sport and recreation facilities including dual use playing fields</u>	40	A Country Park (additional to the public open space above)	24.5 (minimum)	Residential development of approximately 3,500 dwellings	402 <u>100</u>	<u>A District Centre located within Fonnereau Neighbourhood, providing:</u>	3.5	<ul style="list-style-type: none"> <li data-bbox="860 1185 1357 1310">i. A maximum of 2,000 sq m net of convenience shopping, to include a medium/large supermarket between 1,000 and 1,700 sq m net; 		<ul style="list-style-type: none"> <li data-bbox="860 1345 1357 1372">ii. Up to 1,220 sq m net of comparison 	
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			<p>shopping;</p> <ul style="list-style-type: none"> iii. Up to 1,320 sq m net of services uses including non-retail Use Class A1, plus A2 to A5 uses; iv. A health centre; v. A library; vi. A police office; vii. A multi-use community centre; and viii. Appropriate <u>Residential</u> accommodation in the form of <u>appropriately designed and located</u> upper floor apartments. <p><u>Two Local Centres located in Henley Gate and Red House neighbourhoods,</u> together providing:</p> <ul style="list-style-type: none"> i. Up to 500 sq m net of convenience retail floorspace ii. Up to 600 sq m net of comparison retail floorspace; and iii. Up to 500 sq m net of service uses including non-retail Use Class A1, plus Classes A2 to A5; and iv. <u>Community Centre use (which could include Country Park Visitor Centre use)</u> <p>1.5 including 0.5ha per local centre in the <u>Henley Gate Northern</u> and <u>Red House Eastern</u> neighbourhoods and 0.5ha within the <u>Henley Gate Northern</u> neighbourhood for the country park visitor centre <u>and</u> community <u>community centre.</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p style="text-align: center;"><u>located in Henley Gate</u></p> <p>A secondary school within the <u>Red House Eastern</u> neighbourhood <u>with access from Westerfield Road</u> 9</p> <p>Three primary schools (<u>one in each neighbourhood</u>) 6</p> <p>Primary road infrastructure, including a road bridge over the railway to link the <u>Henley Gate Northern</u> and <u>Fonnereau Southern</u> neighbourhoods 8.5 5</p> <p>Total 195</p> <p>The broad distribution of land uses is indicated on the policies map. The detailed strategic and neighbourhood infrastructure requirements for the development and the triggers for their delivery are included in Table 8B in Chapter 10. <u>Triggers for their delivery will be identified through the Ipswich Garden Suburb Infrastructure Delivery Plan.</u></p> <p>Future planning applications for the site shall be supported by an Infrastructure Delivery Plan based on the identified infrastructure requirements set out in Table 8B. The Infrastructure Delivery Plan shall set out in more detail how the proposed development and identified strategic and neighbourhood infrastructure will be sequenced and delivered within the proposed schemes.</p> <p><u>Overall, the Council will seek 31% affordable housing at Ipswich Garden Suburb. For each individual application, the level of affordable housing should be the maximum compatible with achieving the overall target and achieving viability, as demonstrated by an up to date viability assessment which has been subject to independent review. The re-testing of the viability will occur pre-implementation of individual applications within each neighbourhood. Each phase of development will be subject to a cap of 35% affordable housing. The Council will seek a mix of affordable dwelling types, sizes and tenures in accordance with policies CS8 and CS12.</u></p> <p><u>An interim supplementary planning document has been prepared, with the expectation</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p><u>that a final version will be adopted following adoption of this Core Strategy. The supplementary planning document (SPD) will to:</u></p> <ul style="list-style-type: none"> a. guide the development of the whole Ipswich Garden Suburb area; b. amplify the infrastructure that developments will need to deliver on a comprehensive basis alongside new housing, including community facilities and, at an appropriate stage, the provision of a railway crossing to link potential development phases, in the interests of sustainability and integration; c. identify the detailed location of a district and two local centres and other supporting infrastructure; and d. provide guidance on the sequencing of housing and infrastructure delivery required for the development. <p><i>(the final three paragraphs of the policy are unchanged)</i></p>
CSR MM10	50	CS10 – supporting text	<p><i>Split paragraph 8.108 and add new text providing more detail about infrastructure requirements and the purpose of Table 8B:</i></p> <p>8.108 The infrastructure requirements at the Garden Suburb will be significant and include new roads ecological networks and green corridors, new public transport routes and services, green infrastructure such as allotments and sports facilities, new schools, new recreation provision, healthcare provision and local shopping facilities. This infrastructure can also deliver benefits to the existing communities in the area and help to sustain them. A comprehensive and coordinated approach to the development of the Garden Suburb is required to ensure the proper planning and delivery of this infrastructure. The Council will consider using its compulsory purchase powers, where necessary, to enable comprehensive development and infrastructure delivery to take place.</p> <p><i>(split/new paragraph) The detailed infrastructure requirements of the development of approximately 3,500 dwellings at the Garden Suburb and trigger points for the delivery of the items of infrastructure are identified in Table 8B in Chapter 10 of the Core Strategy. <u>All infrastructure items identified through this policy and Table 8B have been identified by the Council and relevant providers as necessary to</u></i></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p><u>make the development acceptable in planning terms for various reasons related to ensuring sustainable development, mitigating transport impacts, meeting Habitat Regulations requirements and ensuring future residents are well served by the necessary educational and social facilities essential to any successful residential development of this nature and scale. Each Ipswich Garden Suburb planning application will comply with the Community Infrastructure Levy Regulations tests. Table 8B divides the infrastructure into two categories:</u></p> <ol style="list-style-type: none"> 1. <u>Strategic Infrastructure, which is required to mitigate the cumulative impact of, and serve the whole of, the Garden Suburb development.</u> 2. <u>Neighbourhood Infrastructure, which refers to local infrastructure required primarily to serve the needs of the residents of the neighbourhood in which it is located.</u> <p><u>(new paragraph) The purpose of Table 8B is to set a clear steer on what infrastructure should be provided. The trigger points for the delivery of the infrastructure items identified through Table 8B will be determined as part of the preparation of the Infrastructure Delivery Plan. This is intended to provide assurance as to how the development of the Ipswich Garden Suburb will be appropriately sequenced and supported by the necessary infrastructure. The triggers will be guided by:</u></p> <ul style="list-style-type: none"> • <u>Advice from key stakeholders in light of available evidence concerning existing capacity, likely impact and mitigation required, for example through the Transport Assessment;</u> • <u>The likely sequencing and management of development identified through Strategic Phasing Plan documents;</u> • <u>The desire to create cohesive neighbourhoods in the interest of securing a sustainable development pattern and consideration of what is necessary at various stages of the development in order to deliver a sustainable form of development;</u> • <u>Ensuring that the development is viable and deliverable; and</u> • <u>The availability of appropriate land.</u> <p><u>(split paragraph) Prior to development on the Ipswich School Playing Fields site, replacement sports facilities will be required to be first provided in accordance with policy DM28. The site for replacement playing fields is allocated to the west of Tuddenham Road and north of the railway line.</u></p>

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			<p><i>Add a new paragraph above existing paragraph 8.110 to justify, and support the implementation of, the affordable housing requirement at Ipswich Garden Suburb:</i></p> <p><u>new paragraph) The Council has undertaken extensive viability work with input from the various development promoters at Ipswich Garden Suburb. This concludes that 31% affordable housing calculated as a percentage of dwellings is deliverable across the whole scheme. The Council will seek to secure 31% affordable housing across the scheme which would equate to 1,085 affordable houses in a total scheme of 3,500 homes. It is further recognised that the investment needed in infrastructure during the early phases of development may necessitate a lower percentage of affordable housing, but the viable percentage will increase as the need for infrastructure investment decreases in the later phases to allow the overall target of 31% across the Ipswich Garden Suburb. The Council recognises that the levels of affordable housing will be subject to more detailed viability work as part of the planning application process, and for those proposals which include a significant scale of development, then pre-implementation re-testing of viability will be expected for individual applications within a proposal. In recognition of the investment and risk certain development promoters will be making in the early phases of their developments, a 35% cap on the percentage of affordable housing for each phase will be applied (ie phases N1(a), N1(b), N2(a), N2(b), N3(a) and N3(b) as set out in the Ipswich Garden Suburb Viability Assessment by Gerald Eve, June 2016). It may be appropriate for certain components of each phase to deliver more than 35% affordable housing in order to deliver the overall target of 31%. These provisions would be secured through the relevant planning obligations.</u></p>
CSR MM11	52	CS11 Policy and supporting text	<p><i>Amend the introductory text in 8.111 to refer to the national change to the definition of Gypsies and Travellers:</i></p> <p><u>8.111 Ipswich has 43 permanent pitches for Gypsies and Travellers at present, and the future Gypsy, and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) identifies the Borough needs to 2034/2027. In addition, national guidance requires the Core Strategy to include a criteria based policy to guide the siting and location of sites for Gypsies and Travellers. The accommodation needs of Gypsies and Travellers need to be considered alongside those of the 'settled' population. At the time of writing, the Government is consulting on changes to national guidance for Gypsies and Travellers, including amending the definition of 'traveller' to exclude those now permanently not travelling. The revised national Planning Policy for Traveller Sites, published in August 2015, amends the definition of Gypsies and Travellers for planning purposes to exclude those who have ceased travelling permanently.</u></p> <p><i>Amend CS11 to specify the number of pitches needed; ensure existing pitches are protected; and refer to</i></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p><i>heritage assets:</i></p> <p>Provision will be found within the Ipswich Policy Area for additional permanent pitches to meet the need <u>for 24 permanent pitches to 2031</u>, as identified through the Gypsy and Travellers Accommodation Assessment <u>and projected forward to 2031</u>.</p> <p>Applications for the provision of permanent pitches will be considered against the following criteria:</p> <p>a) The existing level of local provision and need for sites; b) The availability (or lack) of alternative accommodation for the applicants; and c) Other personal circumstances of the applicant, including the proposed occupants, must meet the definition of Gypsy or Traveller.</p> <p>Sites for additional Gypsy and Traveller pitches will be assessed against the following criteria.</p> <p>a. The site should be located:</p> <p>i. where it would be well served by the road network; and ii. preferably, within 1km of basic services including the public transport network.</p> <p>b. The site should be:</p> <p>i. accessible safely on foot, by cycle and by vehicle; ii. large enough to allow business activities to be carried out; iii. free from flood risk and significant contamination; iv. safe and free from pollution; v. capable of being cost effectively drained and serviced, including with waste disposal and recycling facilities; vi. proportionate in size to any nearby settlements, to support community cohesion; and vii. where possible, located on previously developed land.</p> <p>c. The site should not have a significant adverse impact on:</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<ul style="list-style-type: none"> i. the residential amenity of immediate or close neighbours; ii. the appearance and character of the open countryside; iii. sites designated to protect their nature conservation, ecological networks, geological or landscape qualities; iv. historic <u>heritage</u> assets including their setting; and v. the physical and social infrastructure of local settlements. <p>Site identification will be carried out in consultation with the Gypsy and Traveller and settled communities. Site size and design will be in accordance with government guidance.</p> <p>The Council will work with Suffolk County Council and neighbouring authorities to develop a South Suffolk transit (short stay) site between Ipswich and Felixstowe.</p> <p>The needs of travelling showpeople will be kept under review. Applications for new sites will be assessed against criteria a. to c. above.</p> <p><u>Sites currently used by Gypsies and Travellers are identified on the policies map and are protected for that use.</u></p> <p><i>Amend supporting text in 8.114 and 8.115 to correct the study title and specify the number of short stay sites needed:</i></p> <p>8.114 Sites will be sought to meet the joint needs of Ipswich and neighbouring authorities for permanent pitches within the Ipswich Policy Area (note that the boundary of the Ipswich Policy Area may change). Need for Ipswich and its neighbouring authorities was identified by the Gypsies and Travellers <u>Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA)</u> carried out in 2013 by Opinion Research Services. The 2013 assessment identified a need for 18 pitches in Ipswich Borough to 2027, out of a need for 101 pitches across the five local authority areas included in the assessment (Ipswich, Babergh, Mid-Suffolk, Suffolk Coastal and Waveney). Of the 18 pitches needed, 5 are needed between 2012 and 2017, 6 between 2017 and 2022 and 7 between 2022 and 2027. Projecting this forward to the end of the Plan period, and based on 2.5% per annum compound growth, beyond the timescale considered by the</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p>assessment, it is possible that around a further 6 pitches would be needed between 2027 and 2031.</p> <p>8.115 The Council will work with Suffolk authorities to meet the joint transit (short stay) and permanent needs and the needs of travelling showpeople. <u>The GTAA identifies a need for three short stay sites across the study area.</u></p>
CSR MM12	54	CS12 Policy and supporting text	<p><i>Amend CS12 to remove reference to affordable housing at Ipswich Garden Suburb, which is covered instead through policy CS10; change the basis of calculating affordable housing provision to number of dwellings; and include a statement about on-site provision and integration, which was previously contained in policy DM24 (now deleted):</i></p> <p>The Council will seek to ensure that a choice of homes is available to meet identified affordable housing needs in Ipswich. Outside the Ipswich Garden Suburb, tThis will be achieved by requiring new development at the Ipswich Garden Suburb to provide for at least 35% on-site affordable housing by total floor space and new developments of 15 dwellings or more (or on sites of 0.5ha or more) in the remainder of the Borough to provide for at least 15% on-site affordable housing by <u>number of dwellings</u> total floor space. At least 80% of affordable housing provision shall consist of affordable rented homes or homes for social rent.</p> <p>The Council will only consider reducing the requirement for the proportion of affordable housing on a particular development site, or amending the tenure mix to include more intermediate housing, where:</p> <ol style="list-style-type: none"> a. Alternative provision is outlined by the applicant within a site-specific viability assessment (using a recognised toolkit) and the conclusions are accepted by the Council; or b. An accepted independent review of development viability finds that alternative provision on viability grounds is justifiable; and c. The resultant affordable housing provision would ensure that the proposed development is considered sustainable in social terms through its delivery of housing integration, with particular regard to meeting the identified need for small family dwellings where these can reasonably be integrated into the scheme.

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			<p data-bbox="660 300 1711 389"><u>The presumption will be in favour of on-site provision rather than the payment of commuted sums in lieu of provision. Affordable housing should be integrated into developments and should not be readily distinguishable from market housing.</u></p> <p data-bbox="562 432 1749 496"><i>Amend the supporting text of 8.123 – 8.124 and 8.126 - 8.127 to reflect the changes to CS12 and the deletion of DM24:</i></p> <p data-bbox="562 533 1800 683">8.123 The Council will aim to supplement affordable housing provision from private developments by developing its own sites and providing in excess of 15% affordable housing by total floor space <u>number of dwellings</u>. This will contribute to meeting the policy requirement for affordable housing on sites outside of the Ipswich Garden Suburb to comprise at least 15% of new residential floor space over the Plan period.</p> <p data-bbox="562 719 1794 962">8.124 There is a specific affordable housing target for the Ipswich Garden Suburb based on a number of site characteristics, including higher than average house prices in the immediate locality of the site and its relatively low existing use value. Furthermore, an independent viability appraisal carried out in 2013 indicated that provision near to 35% was achievable on site alongside other development and infrastructure costs at that point in time. However, some flexibility around the provision of affordable housing on site is considered necessary where this would enable the delivery of new infrastructure to support a particular phase of the development. As such, the policy requirement will similarly be subject to site-specific viability considerations.</p> <p data-bbox="562 999 1794 1123">8.126 Policy CS17 sets out the approach to delivering infrastructure in the Borough and re-iterates the legislation governing the Community Infrastructure Levy that affordable housing will remain outside the standard charge system. A more detailed affordable housing policy (policy DM24) is set out in Part C.</p> <p data-bbox="562 1160 1749 1252">8.127 The NPPF definition of affordable housing will apply in implementing this policy. The affordable housing floorspace requirement will be calculated by applying the relevant percentage to the total floorspace of dwellings to be provided.</p>

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CSR MM13	56	CS13	<p data-bbox="562 304 1800 408"><i>Amend the area of land allocated through clause a. to 35ha and include reference to certain sui generis uses; delete reference to Futura Park in clause d. to reflect its status as an employment area rather than a strategic employment site; and correct reference to the University of Suffolk:</i></p> <p data-bbox="658 448 1789 539">The Council will promote sustainable economic growth in the Ipswich Policy Area, with a focus on the delivery of jobs within the Borough. It will encourage the provision of approximately 12,500 jobs in the Borough between 2011 and 2031 by:</p> <ul style="list-style-type: none"> <li data-bbox="658 576 1800 699">a. allocating at least 35ha 30ha of land for employment development (in Use Classes B1, B2 and B8) and appropriate employment-generating sui generis uses through the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document; <li data-bbox="658 735 1783 799">b. protecting land for employment uses in existing employment areas defined on the policies map; <li data-bbox="658 836 1800 927">c. allocating land for other employment-generating uses including education, leisure, tourism and hospitality, and retail, through the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document; <li data-bbox="658 963 1789 1054">d. safeguarding approximately 10ha of land at Futura Park, Nacton Road as a strategic employment site, with the principal access taken from Ransomes Way. The site will be safeguarded for B1, B2 and B8 uses; <li data-bbox="658 1091 1783 1155">e. <u>d.</u> supporting the growth of the University of Campus Suffolk and Suffolk New College in order to raise skills and qualifications levels in the workforce; and <li data-bbox="658 1192 1783 1283">f. <u>e.</u> taking a lead with local partners to ensure that coordinated action is taken to encourage sustainable economic growth and protect local jobs, and by drawing up a delivery plan with local partners to ensure these aims are implemented. <p data-bbox="562 1321 1800 1385"><i>Amend 8.134 to explain how the policy will be reviewed through the preparation of joint or aligned Local Plans:</i></p>

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			<p>8.134 A joint Employment Land Review was undertaken in 2009 by Ipswich Borough Council, Suffolk Coastal District Council and Babergh District Council through the Haven Gateway Partnership and in conjunction with Suffolk County Council. It recommended that a cross boundary approach be taken within the Ipswich Policy Area to ensure jobs provision. The Council is working in partnership with local authorities on the Suffolk Growth Strategy as agreed in February 2013 and also through the Ipswich Policy Area Board and other joint working forums as they arise to ensure that sustainable economic growth is achieved. This is aligned with the New Anglia Local Enterprise Partnership Strategic Economic Plan and the Greater Ipswich City Deal. <u>The jobs target and employment land requirement set out in this policy will be reviewed as part of forthcoming joint work with neighbouring authorities on joint or aligned Local Plans.</u></p> <p><i>Amend 8.135 and 8.138-8.140 to reflect the deletion of the strategic employment site and add reference to where in the Plan appropriate employment-generating sui generis uses are defined:</i></p> <p>8.135 The Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document will translate the overall land requirement into sites. The Council will ensure that enough land is available, including a variety of site sizes and locations to suit different employment-generating activities. The 10ha of land allocated at Futura Park is additional to the 30ha specified in clause a. of the policy. <u>Appropriate employment-generating sui generis uses are defined through policy DM25.</u></p> <p>8.138—The Regional Spatial Strategy required that readily serviceable regionally significant strategic sites were identified within the Haven Gateway to support regeneration at Ipswich including its role in communications technology, and development associated with port expansion at Felixstowe. The Suffolk Growth Strategy identifies these in conjunction with local authority Local Plans.</p> <p>8.139—The Employment Land Review investigated both demand/need for and the possible supply of strategic employment sites in the Ipswich area. It concluded that there was capacity for a site in Ipswich, in addition to other possible sites within the Ipswich Policy Area. The former Crane’s site was allocated through the 2011 Core Strategy as a strategic employment site to function as Phase II of the Ransomes Europark development and help to consolidate an important employment corridor. Now known as Futura Park, approximately 10ha of land is safeguarded for B Class employment uses through this policy. The site’s location is indicated on the key diagram. A detailed site boundary is defined on the policies map.</p>

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			<p>8.140 The site is allocated for B1, B2 and B8 uses under the Use Classes Order. Office uses are directed to the town centre through the approach to the location of development set out in policy CS2. This will further be reflected in site allocations to be made in the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document and is in accordance with the National Planning Policy Framework, which defines offices as a town centre land use. However, B1 office uses may exceptionally be considered acceptable at Futura Park if they are linked to other on-site activities such as research and development that require a large site, or are directly related to the key growth sectors identified and are therefore performing a strategic role. The site could also be suitable for the provision of some starter units to support new businesses.</p>
CSR MM14	59	CS14 Policy and supporting text	<p><i>Amend introductory text:</i></p> <p>8.147 For retail policy purposes, Ipswich town centre is defined <u>The Ipswich Central Shopping Area.</u> The area sits in the historic core of the town to the north of the Waterfront. It has the advantages for the user of being attractive, compact and largely pedestrianised. The area is also a focus for other town centre activities such as the New Wolsey Theatre, the Regent Theatre and the Town Hall and Corn Exchange. The Central Shopping Area is complemented by a growing specialised retail role with food and drink venues in the vicinity of the Waterfront. It is important that the Council manages the physical and functional linkages between the two areas to maintain a positive relationship and ensure that retail development at the Waterfront does not harm the vitality and viability of the town centre.</p> <p><i>Amend policy CS14 to re-order, update in relation to the Site Allocations Plan and delete reference to floorspace requirement:</i></p> <p>POLICY CS14: RETAIL DEVELOPMENT AND MAIN TOWN CENTRE USES</p> <p>The Council will promote high quality investment and development in Ipswich Central Shopping Area, to maintain and enhance its attraction and market share, and strengthen its regional role. <u>In the district centres and local centres, the Council will encourage retail development of a scale appropriate to their size, function and catchment.</u></p> <p>Through the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document, the Council intends to extend <u>extends</u> the Central Shopping Area to include the Westgate quarter and allocate sites <u>allocates a site</u> for retail development within it. This will</p>

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			<p>enable the delivery in the region of 15,000 sq m net of additional floorspace to diversify the retail offer. As part of the review of the plan, a floorspace requirement for future retail provision will be set and, if necessary, further Further allocations will be made through a future Site Allocations DPD. In the interim period proposals for retail development over 200 sq m net on sites allocated for other uses will be considered against policy SP1 and on other sites outside the Central Shopping Area and defined district or local centres against policy DM23. Retail development of less than 200 sq m net will be permitted subject to compliance with other policies of the plan. following a review of the Retail capacity study to address provision after 2026. Retail development over 200 sq m net in edge of centre or out of centre locations will be considered in light of national policy and the Council's aim to enhance the role, vitality and viability of the Ipswich Central Shopping Area.</p> <p>The Council will direct other town centre uses including offices, leisure, arts, culture, tourism and hotel developments into an extended town centre area, with some provision being appropriate in the CSA and Waterfront, in recognition of the area's good accessibility by public transport, cycle and foot.</p> <p>The Council will also promote environmental enhancements and urban greening to the town centre and improved public transport accessibility.</p> <p>In the district centres and local centres, the Council will permit retail development of a scale appropriate to their size, function and catchment.</p> <p><i>Amend supporting text in paragraphs 8.148 and 8.153 to reflect evidence and ensure consistency with the Site Allocations Plan:</i></p> <p>8.148 The policy responds to the findings of the Ipswich Retail Study 2005, as confirmed by the Retail and Commercial Leisure Study 2010, the Ipswich Town Centre Opportunity Areas Report 2013 <u>and update in 2016,</u> and Ipswich's role and status as a county town and a regional centre.</p> <p>8.153 The Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document will extends the Central Shopping Area <u>western</u> boundary from that shown in the 1997 Local Plan and will allocates <u>a</u> new sites for additional retail development within it. It will also extend the wider town centre boundary as the focus for other 'town centre' uses such as leisure, offices, cultural uses and hotels (see NPPF for full list of main town centre uses). Enhancing the town centre</p>

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			forms an important part of the strategy for urban renaissance in Ipswich over the plan period.
CSR MM15	61	CS15 Policy only	<p><i>Amend final paragraph of CS15 to explicitly state the requirement that sports facilities at the school would be available for community use:</i></p> <p>Education needs associated with development at the Ipswich Garden Suburb are identified, a secondary school site allocated and broad locations for primary schools safeguarded through policy CS10 of this plan and the policies map. <u>The sports facilities associated with the secondary school will be required to be made available for dual use by the community.</u></p>
CSR MM16	63	CS16 Policy only	<p><i>Amend CS16 to clarify that new development should only meet its own open space needs:</i></p> <p>The Council will safeguard, protect and enhance biodiversity and the environment by working in partnership with others to ensure that our parks and open spaces are well designed, well managed, safe and freely accessible, encouraging use and benefitting the whole community. The Council will enhance and extend the ecological network and green corridors, open spaces, sport and recreation facilities for the benefit of biodiversity, people and the management of local flood risk. It will do this by:</p> <p>a. requiring all developments to contribute to the provision of open space <u>necessary for that development</u> according to the Borough's standards, identified strategic needs and existing deficits in an area;</p>
CSR MM17	67	CS17 Policy and supporting text	<p><i>Amend second paragraph of CS17 to clarify the relationship to CIL:</i></p> <p>Each development will be expected to meet site related infrastructure needs, and where <u>Where</u> the provision of new, or the improvement or extension of existing, off- site infrastructure is needed to support a new development or mitigate its impacts, <u>and it is not anticipated that the infrastructure will be provided through CIL</u>, the developments will be required to contribute proportionately through a Section 106 Agreement commuted sum or CIL charge, or other mechanism as agreed with the Council.</p>

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			<p><i>Amend bullet 3 in the list of key strategic infrastructure in CS17:</i></p> <ul style="list-style-type: none"> • measures to increase <u>and maximise</u> east-west capacity in the <u>public</u> transport system to ease congestion; <p><i>Amend final sentence of CS17 to refer to the Mitigation Strategy and its delivery:</i></p> <p>The Council will seek contributions to ensure that the mitigation measures identified in the Habitats Regulations Assessment and in the Recreational Avoidance and Mitigation Strategy can be addressed <u>and delivered</u>, including for any measures not classified as infrastructure.</p> <p><i>Amend final sentence of new paragraph which follows paragraph 8.182 to commit to the Recreational Avoidance and Mitigation Strategy:</i></p> <p>(new paragraph) The Habitats Regulations Assessment identifies a range of measures to ensure that potential impacts of increased recreational disturbance within Special Protection Areas and Special Areas of Conservation within and outside of Ipswich Borough are mitigated. This relates to mitigating the cumulative effect of housing growth across Ipswich Borough, in combination with housing growth in Suffolk Coastal district. The measures include the provision of the Country Park or similar high quality provision to the north of Ipswich, delivering parts b, d, e, g and h of policy CS16, production and implementation of visitor management plans at key sites and a monitoring programme to assess visitor impact over time. The Council is considering the production of a mitigation strategy which would specify the measures required and how these should be delivered and funded. <u>The Council will produce a Recreational Avoidance and Mitigation Strategy by March 2017, which will specify the measures required and how these will be delivered.</u></p>
CSR MM18	73	CS20 Policy and supporting text	<p><i>Amend CS20 to explicitly support sustainable travel:</i></p> <p>The Council supports <u>measures to improve sustainable travel options, including the Travel Ipswich scheme, which aims to reduce dependency on the private car by 15% within the lifetime of the Plan. This will improve bus station provision, passenger information, shuttle bus</u></p>

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			<p>provision and pedestrian links between the Central Shopping Area, the railway station and Waterfront.</p> <p>The Council also supports the completion of the upgrading of the Felixstowe to Nuneaton rail line.</p> <p>In the short term the Council will look to close the Waterfront Northern Quays route to general traffic, maintaining access only for pick up/drop off and the shuttle bus.</p> <p>The Council will support further measures to facilitate cycling and walking in the Borough, as detailed through the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.</p> <p><i>Amend 8.208 to refer to supplementary planning documents and correction to 8.209:</i></p> <p>8.208 Detailed proposals, including those for the Star Lane gyratory and additional infrastructure for pedestrians and cyclists, are included in the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document. <u>A Cycling Strategy Supplementary Planning Document has been adopted by the Council. The Council is also producing a Low Emission Strategy Supplementary Planning Document during 2016-2017.</u></p> <p>8.209 The delivery of a Wet Dock crossing (i.e. a new road linking Holywells Road/Duke Street with Hawes Street) is a long term prospect and it is as yet uncertain. In March 2015 the New Anglia Local Enterprise <u>Partnership</u> obtained funding in order to carry out a feasibility study for the Wet Dock Crossing. It is recognised that it would only be likely to happen if the Island site comes forward for redevelopment. Potential funding sources include:</p>
CSR MM19	77	DM1 Policy and supporting text	<p><i>Delete clauses c., d. and e. of policy DM1 and add reference to encouraging rather than requiring BREEAM:</i></p> <p>New development shall be required to achieve a high standard of environmental sustainability. This will be achieved by the following standards:</p> <p>a. New build residential development should achieve reductions in CO₂ emissions of 19% below the Target Emission Rate of the 2013 <u>Edition of the 2010 Building</u></p>

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			<p style="text-align: center;">Regulations (Part L); and</p> <p>b. New build residential development should meet water efficiency standards of 110 litres/person/day;</p> <p>c. Conversions and changes of use of existing buildings providing new residential dwellings should achieve a minimum of BREEAM Domestic Refurbishment Very Good standard or equivalent;</p> <p>d. New build non-residential development of 500m2 and above for the whole development should achieve a minimum of BREEAM Very Good standard or equivalent;</p> <p>e. Conversions and changes of use to non-residential uses with an internal floor area of 500m2 and above should achieve a minimum of BREEAM Very Good standard or equivalent.</p> <p>Development will also be expected to incorporate sustainable drainage and water efficiency measures as required by DM4.</p> <p><u>All developments exceeding the thresholds above shall achieve the</u> The above standards should be achieved as a minimum unless, in exceptional circumstances, it can be clearly demonstrated that this is either not feasible or not viable.</p> <p><u>The Council will also encourage non-residential development of 500 sq m and above to achieve a minimum of BREEAM Very Good standard or equivalent.</u></p> <p><i>Amend paragraphs 9.11 and 9.13 to reflect the change in approach to BREEAM from a requirement to encouragement:</i></p> <p>9.11 The policy provides for some flexibility in exceptional circumstances where it can be clearly demonstrated that achieving the required standard for the type and scale of development in question would either be not feasible or not viable in the light of such considerations as site constraints, other planning requirements, other development costs, and the prevailing market conditions at the time. In such circumstances the Council may agree to a lower BREEAM rating or lower energy efficiency standards being achieved having regard to other merits of the scheme in terms of sustainability and urban design. Development will still need to meet the requirements of the Building Regulations in</p>

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			<p>force at the time.</p> <p>9.12 This is considered to be a relatively simple policy approach that prescribes clear targets based on recognised national codes, without being unduly prescriptive as to how the targets should be achieved.</p> <p>9.13 In relation to the achievement of BREEAM standards BREEAM requirements, the policy will be implemented through a requirement for the submission of developers will be encouraged to submit Design Stage Assessments and Post Construction Reviews, carried out by a qualified BREEAM assessor (as appropriate), for all planning applications for qualifying development. It will be expected that planning applications also be accompanied by a sustainability statement that explains and illustrates how sustainability considerations have influenced scheme design.</p>
CSR MM20	80	DM2 Supporting text only	<p><i>Amend the supporting text in 9.15 and 9.18 to reflect changes made to policies CS1 and DM1:</i></p> <p>9.15 This policy gives effect to Core Strategy policy CS1, which sets a target for achieving renewable or low carbon energy sources in major development. It builds on national policy in the National Planning Policy Framework which states that planning plays a key role in supporting the delivery of renewable and low carbon energy.</p> <p>9.18 The policy also provides for some flexibility where it can be clearly demonstrated that achieving the required percentage provision of renewable or low-carbon energy would not be either technically feasible or financially viable in the light of such considerations as site constraints, other planning requirements, development costs, and the prevailing market conditions at the time. In such circumstances the Council may agree to a lower percentage provision being achieved where the introduction of additional energy efficiency measures (i.e. additional to those required under BREEAM requirements as set out in policy DM1 such as passive house design or other inbuilt energy efficiency measures) to achieve an equivalent reduction in carbon emissions.</p>
CSR MM21	81	DM3 Supporting text only	<p><i>Amend paragraph 9.19 of the supporting text to clarify the approach to private garden space:</i></p> <p>9.19 The Council considers that, in addition to the provision of well-planned public spaces, the provision of high quality private outdoor amenity space for all types of new residential development must be considered to be an essential component of high quality design, and key to the creation of a sustainable residential environment both in terms of its contribution to liveability and to urban greening and the preservation and/or enhancement of local biodiversity and ecological networks. <u>In</u></p>

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			<p><u>most developments of houses and bungalows, the Council will expect private garden space to be provided to the rear of the dwelling. Exceptions may be made for corner and infill plots.</u></p> <p><i>Amend paragraph 9.24 of the supporting text to clarify what is required:</i></p> <p>9.24 Key characteristics of well designed private amenity space <u>include</u> will normally be required, and these are: (i) a well shaped (rectangular), useable area having good accessibility and a well planned relationship to the internal living spaces within the dwelling; (ii) provision for a private sitting out area not <u>directly</u> overlooked by any window of a neighbouring property either at ground or first floor; (iii) high standards of security and privacy; (iv) a reasonable outlook; and (v) access to direct sunlight for part of the space for at least part of the day. The Council's Development Control Policies and Design Guidelines, which address matters such as spacing between dwellings, will apply, until the adoption of a Space and Design Guidelines supplementary planning document. The garden standards set out in the policy will equally apply to existing gardens remaining after garden severance.</p>
CSR MM22	86	DM5 Policy and supporting text	<p><i>Amend policy DM5 clauses f. and h. to add clarity; amend the requirement for M4(2) to 25% and delete the requirement for standard M4(3):</i></p> <p>The Council will require all new development to be well designed and sustainable. In Ipswich this will mean:</p> <ul style="list-style-type: none"> a. layouts and designs that provide a safe, attractive, permeable, legible and useable public realm for all users, which is pedestrian and cycle orientated; b. areas which function well and where possible integrate residential, working and community environments and fit well with adjoining areas; c. the promotion of safe and secure communities; d. greener streets and spaces to contribute to local biodiversity, visual amenity, and health and well-being, and offset the impacts of climate change;

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			<p>e. protecting and enhancing the special character and distinctiveness of Ipswich, including significant views that are recognised as being important and worth protecting, the setting of any nearby listed buildings, and helping to reinforce the attractive physical characteristics of local neighbourhoods and the visual appearance of the immediate street scene;</p> <p>f. developments buildings that exhibit very good architectural quality, are highly sustainable and accessible and are designed for long life by being capable of adaptation to accommodate changing needs and uses over time;</p> <p>g. ensuring that new development incorporates cycle and waste storage, public transport infrastructure and car parking if appropriate, all designed and integrated in a way that supports the street scene and safeguards amenity;</p> <p>h. new buildings in or around Air Quality Management Areas will be designed so that their size and layout will preferably reduce minimise, and at the very least not increase, localised retention of polluting emissions, and will include ventilation systems that protect the health of users of the buildings; and</p> <p>i. provision of public art where this would be required to enhance the public realm and/or reinforce a sense of place, which may include new installations where this would be commensurate to the scale and type of development or otherwise take the form of bespoke paving, street furniture and landscaping.</p> <p>Design that is considered not to adequately meet all these criteria will be refused.</p> <p>In new residential development of 10 or more dwellings, 25% 35% of new dwellings will be required to be built to Building Regulations standard M4(2). Where affordable housing is provided a proportion of dwellings are required to be built to Building Regulations standard M4(3) as part of the affordable housing provision. The Council will consider waiving or reducing the requirement where the circumstances of the proposal, site or other planning considerations mean it is not possible to accommodate the requirement and/or in cases where the requirement would render the development unviable.</p>

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			<p><i>Amend the new paragraph of supporting text which precedes paragraph 9.44 to clarify the approach to standards M4(2) and M4(3):</i></p> <p>(new paragraph) The 2014 Suffolk Housing Survey indicates that 10% of Ipswich residents live in a home which has been adapted in some way for accessibility purposes. The results indicate that a further 3% of Ipswich residents currently require adaptations to their dwellings. Since 2007 almost 1,600 adaptations have been carried out on the Council's housing stock. The number and proportion of elderly residents in the Borough is predicted to increase over future years, potentially further increasing the need for dwellings to be accessible and adaptable. <u>Therefore, 25% of dwellings on sites of 10 dwellings or more should be M4(2) compliant. Should the evidence show this requirement to be, in practice, readily viable, the policy will be revised accordingly as part of the envisaged future review of plans. However, the Council's housing register currently indicates that a relatively small number of wheelchair accessible homes built to Building Regulations Standard M4(3) are needed and, therefore, whilst this type of provision is encouraged within affordable housing developments, it is not a requirement.</u></p> <p><i>Amend 9.48 by deleting 'will' to update cross references, and 9.49 by adding reference to the NPPF:</i></p> <p>9.48 The wooded skyline that provides the backdrop to much of central Ipswich is a key part of the centre's character and setting and will be protected and sustainably enhanced. The Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document and the Ipswich Urban Character Study supplementary planning document will identify key viewpoints and key strategic views in relation to the wooded skyline around central Ipswich. Relevant policy guidance in respect of tall buildings can be found in policy DM6.</p> <p>9.49 The character and distinctiveness of Ipswich is the product of a combination of Ipswich's geographical setting, history and communities. It is fundamental to the local identity and is described in Chapter 5. The character of different areas of Ipswich is analysed through the conservation area character appraisals (covering the conservation areas only) and the Ipswich Urban Character supplementary planning document (the first stage of the SPD covers Norwich Road, Parks, the Orwell and Gipping Valley, and California). <u>Decisions about proposed development which would harm the significance of a designated heritage asset will be taken having regard to the NPPF.</u></p>

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			<p><i>Amend 9.51 to refer to the Planning Practice Guidance:</i></p> <p>9.51 <u>Criterion f. of the policy seeks to secure well designed, adaptable and resilient places in accordance with the Planning Practice Guidance paragraphs 015 and 019 (Reference ID: 26-019-20140306).</u> Assessment of design quality for major applications for residential development will be made using the Building for Life 12 criteria (CABE at the Design Council / Design for Homes / HBF) and applicants will be expected to demonstrate that scheme designs can achieve a 'green' score in each category enabling schemes to be eligible for 'Building for Life Diamond' status. However it is recognised that not every development proposal will meet this criteria and in these circumstances developers will be expected to justify why this is not possible. The Building for Life criteria are reflected in policy DM5 and therefore addressing the specific requirements of Building for Life will contribute towards meeting the requirements of policy DM5. The criteria in policy DM5 also contribute towards the creation of safe, functional and well-designed communities as aspired to by the Government's Lifetime Neighbourhoods ambitions.</p>
CSR MM23	90	DM6 Supporting text only	<p><i>Amend 9.61 to add reference to the NPPF and 9.64 to advise where the arc is illustrated:</i></p> <p>9.61 Tall buildings can only be considered appropriate in certain limited locations in Ipswich and various special considerations, over and above standard urban design considerations, should apply to their planning and design, particularly in listed building and conservation area terms. <u>Decisions about proposed development which would harm the significance of a designated heritage asset will be taken having regard to the NPPF.</u></p> <p>9.64 The boundaries of the arc of land to which this policy applies <u>are illustrated on the IP-One Area Inset Policies Map will be identified in the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.</u> Central Ipswich is circled by a wooded skyline, which is particularly important to the setting of the central area including Ipswich Village and the Waterfront. Developments will only be permitted where they do not seriously disrupt this setting, especially when viewed from key viewpoints. Strategic views in and across central Ipswich have been identified through the Ipswich Urban</p>

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			Character Study supplementary planning document and in Conservation Area Statements and Management Plans.
CSR MM24	92	DM8 Policy and supporting text	<p><i>Amend the policy to address all types of assets, more closely reflect the wording of the NPPF and refer to archaeological assessments being proportionate:</i></p> <p>a. Designated and <u>Non-Undesignated</u> Assets</p> <p>In considering proposals for external or internal alterations and extensions to a listed building, the Council will seek to ensure that this would enhance the character, features and setting of the building and resist development that would adversely affect its significance.</p> <p>An application for the change in the use of a listed building will only be permitted if the applicant can demonstrate that the use proposed and any consequent alterations will not be detrimental to the structure, character, appearance or setting of the building. Applications that provide insufficient information to assess the impact of alterations associated with the proposed change of use will be refused.</p> <p>The Council will resist the demolition or partial demolition of both designated and undesignated heritage assets leading to substantial harm, as outlined in paragraph 133 of the National Planning Policy Framework. <u>In relation to less than substantial harm to designated assets, and in relation to any harm caused to non-designated assets, the Council will have regard to the scale of any harm or loss and the significance of the heritage asset.</u></p> <p>The Council will seek to preserve the preservation of <u>Scheduled Monuments, scheduled registered</u> parks and gardens and other remains of national importance and their settings, in a manner appropriate to their significance.</p> <p>b. Conservation Areas</p> <p>The Council will seek to protect and enhance the character and appearance of conservation areas through adopted Conservation Area Appraisals and Management</p>

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			<p>Plans. These will be used to inform the Council's decisions when assessing the impact of proposals for planning permission.</p> <p>The position, height, mass and materials of a proposed building or extension, and the design of the space and landscaping around it, shall pay regard to the character of adjoining buildings and the area as a whole.</p> <p>The Council will seek to ensure that proposed changes of use within or adjacent to conservation areas would not detract from the character and appearance of the designation, which should include sympathetic alterations and additions to facades that are visible from the public domain and the retention of any existing features of special architectural merit.</p> <p>New shopfronts in conservation areas should be constructed from high quality materials and respect the character and appearance of the building and street scene into which it is installed.</p> <p>Planning applications that seek permission to demolish a building or structure within a conservation area will <u>be determined in accordance with the requirements of the National Planning Policy Framework</u>. be granted where:</p> <p>(i). the building/structure does not make a positive contribution to the significance of the conservation area; or</p> <p>(ii). it can be demonstrated that the building/structure is incapable of repair and reuse; and</p> <p>(iii). the demolition works form part of an approved detailed redevelopment scheme.</p> <p>c. Archaeology</p> <p>Development will not be permitted which may disturb remains below ground, unless the proposal is supported by an appropriate assessment of the archaeological significance of the site and, if necessary, a programme of archaeological investigation in accordance with that assessment. <u>Such assessments should be proportionate to the importance of the site. Sites within the Area of Archaeological Importance are highly likely to contain significant archaeology.</u></p>

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			<p>Planning permission will not be granted if the remains identified are of sufficient importance to be preserved in situ and cannot be so preserved in the context of the development proposed, taking account of the necessary construction techniques to be used.</p> <p>Where archaeological potential is identified but there is no overriding case for any remains to be preserved in situ, development which would destroy or disturb potential remains will be permitted, subject to an appropriate programme of archaeological investigation, recording, reporting and archiving.</p> <p>d. Climate Change</p> <p>Proposals that aim to mitigate the effects of climate change should in the first instance explore all opportunities of enhancing energy efficiency and forms of providing renewable energy without harming the significance of heritage assets. Where conflict between climate change objectives and the conservation of heritage assets is unavoidable, the public benefit of mitigating the effects of climate change will be weighed against the likely harm to the heritage asset.</p> <p><i>Amend paragraph 9.66 of the supporting text to refer to Historic England advice:</i></p> <p>9.66 Buildings listed for their special architectural or historic interest have statutory protection under the Planning (Listed Buildings and Conservation Areas) Act 1990. The Council has a statutory duty to preserve and enhance the character and appearance of listed buildings in Ipswich and will therefore only grant planning permission and listed building consent for works and changes of use which complement this obligation. <u>Historic England publishes advice on the application of Part L of the Building Regulations to historic and traditionally constructed buildings.</u></p> <p><i>Amend paragraphs 9.69 and 9.70 of the supporting text to remove repetition and update the reference to 15 conservation areas:</i></p> <p>9.69 The Council is keen to protect and enhance the town's <u>15-44</u> designated conservation areas which are shown on Plan 3. The character appraisals and management plans for each area highlight what is distinctive about the area including building styles, street patterns, land form, historical development and key views. Future character appraisals will include landscape and tree assessments. Proposals for development in <u>conservation areas</u> will need to indicate precisely how each scheme will preserve and</p>

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			<p>enhance the conservation area in which it is located by a thorough appreciation of these distinctive characteristics.</p> <p>9.70 Proposals for development in Conservation Areas should indicate precisely how each scheme will preserve and enhance the conservation area in which it is located. A development proposal lying outside the boundary of a conservation area yet clearly affecting its character and appearance will be considered as if it formed part of the designated conservation area.</p> <p><i>Amend paragraphs 9.71 – 9.73 to clarify the role of Historic England, national policy and the approach to archaeology:</i></p> <p>9.71 National policy, guidance and advice and policy on the conservation of the historic environment is set out in the Ancient Monuments and Archaeological Areas Act (as amended) 1979, and the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF and the National Planning Practice Guidance. The NPPF supersedes Planning Policy Statement 5 (Planning for the Historic Environment), although the Practice Guide to PPS5 remains in place as guidance <u>This is supported by Historic England’s Good Practice Advice (GPA) and the Historic England Advice Notes.</u> The general approach to managing heritage assets will also follow the guidance set out in BS7913³.</p> <p>9.72 The NPPF establishes a presumption in favour of sustainable development and states that great weight should be given to the conservation of designated heritage assets such as conservation areas. Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, planning permission should not be given unless substantial public benefits can be identified that outweigh that harm or loss. <u>Decisions about proposed development which would harm the significance of a designated heritage asset will be taken having regard to the NPPF.</u></p> <p>9.73 The settlement of Ipswich has developed through Saxon, Medieval and later periods, leaving a legacy of history below ground which tells the complex story of the town’s evolution. To ensure that this invaluable and irreplaceable historical, cultural and educational resource is not lost or damaged, the planning process must ensure that development proposals respect archaeologically important sites. The NPPF sets out specific requirements for assets with archaeological interest. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, developers will be required to submit an appropriate desk based assessment and, where</p>

³ BS7913 British Standard Guide to the Principles of the Conservation of Historic Buildings adopted as formal Council policy in September 1998

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			<p>necessary, a field evaluation (which could include geophysical survey, building survey and trenched evaluation) at an appropriate stage prior to determination of an application. Scheduled Monuments are designated by the Secretary of State and the records held by Historic England who develop policies to protect them. Suffolk County Council Archaeology Service holds the Historic Environment Record for Ipswich and is consulted on planning applications that could affect archaeology. <u>Historic England is consulted on planning applications in accordance with relevant government policy.</u> Early consultation with relevant agencies is encouraged well in advance of seeking planning permission <u>relevant permissions and consents</u>, in order that appropriate consideration is given to heritage assets. assessment and recording requirements can be discussed. This helps make <u>makes</u> the application process simpler and reduces the risk for proposed schemes of heritage assets presenting an obstacle to delivery at a later stage. <u>Understanding the significance of affected assets is important to the process.</u> <u>The ability to document an asset is not a factor in determining a planning application.</u> However, where preservation in situ is not appropriate for archaeological remains, Where there is no overriding case for preservation in situ, an appropriate programme of work to record and promote understanding of remains which would be affected by development could include some or all of <u>the following</u>: further evaluation, upfront excavation, and/or monitoring and control of contractor's groundworks, with appropriate curation and publication of results.</p>
CSR MM25	95	DM9 Policy and supporting text	<p><i>Amend DM9 and supporting text to clarify that structures are included, and update the reference to the Local List SPD:</i></p> <p style="text-align: center;">POLICY DM9: Buildings and Structures of Townscape Interest</p> <p>There is a presumption in favour of retaining and repairing buildings <u>and structures</u> of local townscape interest. Proposals involving the loss of such buildings <u>or structures</u> will only be permitted if it can be demonstrated by thorough analysis in the Design and Access Statement that the replacement building(s) <u>or structure(s)</u> is of an equal or higher standard of design and incorporates sustainability features.</p> <p>9.75 The Council acknowledges the townscape importance of buildings and structures of local interest which have no other statutory protection, and encourages their retention and upkeep. In situations where the benefits of a replacement development outweigh the retention of an existing building <u>or structure</u> on the local list, the Council will expect a high standard of design.</p>

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			9.76 The Local List (Buildings of Townscape Interest) supplementary planning document was published in September 2013 <u>(and revised in July 2016)</u> updating the previous list and identifying buildings <u>and structures</u> of particular local interest.
CSR MM26	96	DM10 Policy and supporting text	<p><i>Amend DM10 to refer specifically to hedgerows in the second part and clarify that replacement planting relates to the loss of mature trees:</i></p> <p>The Council will protect and ensure the care of trees and increase canopy cover in the interests of amenity and biodiversity by:</p> <ul style="list-style-type: none"> a. making Tree Preservation Orders; b. in relation to applications for works to trees, only granting consent for felling, topping, lopping or uprooting if a sound arboricultural reason is provided; c. adhering to the principles of BS3998 ‘Tree work – Recommendations’ 2010 for established tree management options (including soil care and tree felling); d. refusing planning permission for development resulting in the loss or deterioration of aged or veteran trees found outside ancient woodland unless the need for, and benefits of, the development in that location clearly outweigh the loss; and e. encouraging tree planting to help achieve a target of 22% canopy cover by 2050. <p>Applications for development should retain existing trees and hedgerows of amenity or biodiversity value where possible. Where development affecting trees <u>or hedgerows</u> is proposed, the application must be accompanied by:</p> <ul style="list-style-type: none"> f. an accurate survey and assessment of all existing trees <u>and hedgerows</u> on site in accordance with BS5837 ‘Trees in relation to design, demolition and construction – Recommendations’) 2012 by a competent arborist; <u>and</u> g. details of protective measures to be put in place during the development process to ensure the health and safety of each specimen <u>and hedgerow</u> to be retained;

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			<p style="text-align: center;">and</p> <p style="text-align: center;">h. where removal of a mature tree is proposed, a plan for replacement planting on a two for one basis and using semi-mature specimens, unless otherwise agreed by the Council.</p> <p style="text-align: center;">Design in new development should have proper regard to the setting of protected trees. Landscaping and tree planting should be integrated into new development.</p> <p><i>Amend paragraph 9.82 to align with the policy in referring to mature trees:</i></p> <p>9.82 Where the Council permits the removal of <u>mature</u> trees, replacement planting will be on a two for one basis. This may not always be possible or appropriate on the development site in question, and in such cases off-site provision will be expected as an alternative. Applicants are advised to liaise with the Council's Arboricultural Officer at the earliest opportunity to discuss appropriate replacement species and locations. All replacement tree planting proposals will need to be accompanied by a tree care and management plan for the new trees.</p>
CSR MM27	105	DM17 Policy and supporting text	<p><i>Amend DM17 clause a. to ensure consistency with NPPF; clause c. to add flexibility in relation to electric vehicle charging points; and the final sentence of the policy for greater clarity:</i></p> <p style="text-align: center;">To promote sustainable growth in Ipswich and reduce the impact of traffic congestion, new development shall:</p> <p>a. not result in a severe significant adverse impact on rights of way or the local road network in respect of traffic capacity, highway safety;</p> <p>b. not result in a significant impact on air quality or an Air Quality Management Area;</p> <p>c. incorporate electric <u>vehicle</u> charging points and a car club scheme, or if <u>not viable the infrastructure to secure their future delivery</u>, where this would be consistent with the scale and location of the development;</p> <p>d. promote pedestrian and cycle accessibility to and permeability within the site,</p>

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			<p>ensuring that any new routes are coherent and in accordance with the design principles of policy DM5;</p> <p>e. provide high quality, secure cycle storage, and in non-residential developments of more than 1,000 sq. m or where more than 50 people will be employed, high quality shower facilities and lockers; and</p> <p>f. have safe and convenient access to public transport within 400m, and facilitate its use through the provision of services, infrastructure and/or tickets where required.</p> <p>Applicants will be required to demonstrate how the development would improve transport provision and/or how any acceptable adverse <u>transport impacts would be acceptably managed and mitigated.</u></p> <p><i>Amend 9.100 of the supporting text to add flexibility; add two new paragraphs explaining the approach to electric vehicle charging points; and add 'normally' into 9.101 to add flexibility:</i></p> <p>9.100 Necessary mitigating measures to improve public transport infrastructure and services may be secured where this would reasonably relate to a development, whilst the introduction of car club schemes in larger developments may also contribute to reducing levels of private car ownership in the town (the need for car club provision in new developments will generally be informed by the agreed findings of a Travel Plan). <u>Criterion f. of the policy would not be applied unreasonably if limited parts of a development were unavoidably slightly further than 400m from public transport.</u> The inclusion of electric <u>vehicle</u> charging points in residential plots, employment developments and commercial car parks are also considered a sustainable measure that can help to reduce greenhouse gas emissions in line with the aims of the National Planning Policy Framework. The provision of charging points for electric vehicles within new developments should be made in accordance with the Suffolk Guidance for Parking (November 2014).</p> <p><u>(new paragraph) The Council promotes the provision of car club spaces due to their proven ability to reduce car ownership and, in particular, second car ownership. Similarly, wherever viable, the Council will seek low emission vehicle infrastructure. This may include, but is not limited to, active electric vehicle (EV) charging points or the infrastructure required to provide these in the future. New developments should plan for the future installation of charging points for all private off-street residential parking. This entails the provision of ducting and sufficient passive capacity</u></p>

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			<p><u>for easy connection to the electricity network. Whereas active capacity pertains to fully installed EV charging points, passive capacity is defined as the electrical and distribution board capacity necessary for future installation.</u></p> <p><u>(new paragraph) Additionally, new developments containing communal residential parking facilities should aim to deliver active charging capacity for 20 per cent of all spaces, with a further 20 per cent of spaces provided with passive capacity for future installation. Following similar lines, retail related parking should deliver 10 percent active and 10 percent passive spaces, and employment related parking should secure 20 percent active and 10 percent passive spaces. In terms of car club spaces, 100 per cent of such spaces should have the passive capacity for eventual EV charging. Further details of the Council's EV and car club approach are to be outlined in the emerging Low Emissions Strategy Supplementary Planning Document.</u></p> <p>9.101 In proposals for the development of 10 or more dwellings, 1,000 sq. m or more of non-residential floorspace or where more than 50 people would be employed, the Council will <u>normally</u> require a Transport Assessment to be undertaken to include an assessment of the likely impact on the local highway network. A long term management strategy (Travel Plan) to increase sustainable patterns of travel to a site will also be secured in some instances.</p>
CSR MM28	109	DM20 Policy and supporting text	<p><i>Amend policy DM20 and supporting text to refer to 'frontage zones' rather than 'areas' and ensure the Specialist Shopping Frontage Zone is named consistently:</i></p> <p>The Council will support the town's vitality and viability by promoting and enhancing appropriate development in the Central Shopping Area.</p> <p>The Central Shopping Area comprises the Primary, Secondary and Specialist Shopping Frontage ZonesAreas, which are defined on the IP-One Area inset map. A site identified as suitable for major retail investment will be allocated in the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.</p> <p>Class A1 retail use should remain the predominant use at all times in the Central Shopping Area, to ensure the strategic retail function of Ipswich is maintained. A2-A5 uses and other main town centre uses will also be supported in the Secondary and Specialist Shopping Frontage ZonesAreas, provided the overall percentage of the</p>

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			<p>frontage does not exceed the levels specified and accords with the criteria set out below. A1-A5 uses and other main town centre uses are defined in the Glossary.</p> <ul style="list-style-type: none"> a. Primary Shopping <u>Frontage Zone</u>Area – A2-A4 uses, betting shops and payday loan shops will be permitted where they will not exceed 15% of a group of identified ground floor frontages and ground and first floor frontages in the Buttermarket and Tower Ramparts Shopping Centres and the site is not adjacent to an existing non-A1 use within the same Use Class as the proposal. A5 uses will not be permitted. b. Secondary Shopping <u>Frontage Zone</u>Area - A2-A5 uses, betting shops and payday loan shops and other main town centre uses will be permitted where they will not exceed 25% of a group of identified ground floor frontages, and provided the proposal does not create a concentration of more than 30 metres of non-A1 frontage, and the site is not adjacent to an existing non-A1 use within the same Use Class as the proposal. Of this 25%, no more than 10% of the total identified ground floor frontage will be permitted for A4 or A5 uses. c. Specialist Shopping <u>Frontage Zone</u>Area - A2-A5 uses, betting shops and payday loan shops and other main town centre uses will be permitted where they will not exceed 40% of a group of identified ground floor frontages. Of this 40%, no more than 35% of the total identified ground floor frontage will be permitted for A2, A4 or A5 uses. <p>A3, A4 and A5 uses and other main town centre uses will only be permitted where they have no detrimental effect on the amenities of nearby residential accommodation in terms of noise, fumes, smell, litter and general activity generated from the use and retain an active frontage.</p> <p>Mixed use development, including B1 office, A2 financial and professional services, C3 housing, and C1 hotel or any combination of these uses will be supported in the Central Shopping Area, provided there is a ground floor use in accordance with the above.</p> <p>The Council will not grant planning permission for the use of a ground floor unit to a use falling outside classes A1 to A5 in <u>Primary Shopping Frontage Zones</u>Areas and outside</p>

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			<p>A1 to A5 and other main town centre uses in Secondary Shopping <u>Frontage Zones</u>Areas.</p> <p>The Council is planning to redevelop the Cornhill. When applying frontage policies in this area any redevelopment proposal would be taken into account.</p> <p>The Council also supports the retention of the open market.</p> <p>9.113 The CSA is therefore divided into three ‘Shopping <u>Frontage Zones</u>Areas’. The Primary Shopping <u>Frontage Zone</u>Area is the area where the greatest concentration of A1 retail uses is expected. It is a relatively small area which largely coincides with the ‘prime pitch’ for retailers and it has the highest rents and footfall. The Secondary Shopping <u>Frontage Zones</u>Areas are generally characterised by lower rents and footfall than the Primary Shopping <u>Frontage Zone</u>Area. In these areas, the focus remains on A1 retailing, but a greater diversity of uses is permitted. The Speciality <u>Specialist Shopping Frontage Zones</u>Areas contain the greatest diversity of uses. Shops tend to be in smaller units occupied by more specialist retailers. Some of the streets in this area consist of attractive historic buildings, which give them a special character, for example St Peters Street and Fore Street. For the purposes of the sequential approach to locating new retail development, only the pPrimary and eSecondary eShopping <u>Frontage Zones</u>Areas defined on the IP-One Area inset policies map would be considered ‘in town centre’ sites <u>defined through the NPPF as the primary shopping area</u>. The streets within the CSA are broken down into ‘shopping frontages’ by the Council. The frontages usually consist of a continuous line of buildings fronting the street or pavement, segregated by intersecting streets. Individual frontages will continue to be set out in the supplementary planning guidance: ‘Central Shopping Area - Identified Frontages’ document, which is monitored and updated annually.</p> <p>9.114 In the Primary Shopping <u>Frontage Zone</u>Area, the percentage ...</p> <p>9.115 In the Secondary and Specialist Shopping <u>Frontage Zones</u>Areas, the previous</p>
CSR MM29	112	DM21 Policy only	<p><i>Add reference to Class D1 uses (non-residential institutions such as health centres) within District and Local Centres to clause b. of policy DM21:</i></p> <p>b. proposals for change of use from A1 to A2-A5, betting shops and payday loan shops and <u>D1</u></p>

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			<u>uses and</u> sui generis uses appropriate to a centre, including launderettes, will be permitted where they will not exceed 40% of the total identified ground floor frontage, provided the identified shopping frontage or the shopping character and range of shops is not unacceptably diminished. No more than 20% of the total identified ground floor frontage will be permitted for A4 or A5 uses;
CSR MM30	115	DM22 Supporting text only	<p><i>Amend the definition of the Primary Shopping Area in paragraph 9.131 of the supporting text, following changes to policy DM20:</i></p> <p>9.131 The National Planning Policy Framework (NPPF) defines a town centre as an area defined on the policies map, which includes the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. The main town centre uses are defined in the following paragraph. In the Ipswich Local Plan, the primary shopping area <u>consists of the Primary and Secondary Shopping Frontage Zones</u> is called the Central Shopping Area (see policy DM20).</p>
CSR MM31	117	DM23 Supporting text only	<p><i>Amend the definition of the Primary Shopping Area in paragraph 9.147 of the supporting text, following changes to policy DM20:</i></p> <p>9.147 The sequential approach to the consideration of retail proposals will be applied as follows:</p> <ul style="list-style-type: none"> • firstly, to consider whether there are sites available in the Primary Shopping Area, comprising Primary and Secondary Shopping Frontage <u>Zones</u>, and in the District and Local Centres only where the scale of the proposed development is appropriate to the catchment areas the centres serve; • secondly, to consider sites in edge of centre locations as defined in the NPPF; and • thirdly, to consider sites in out of centre locations.
CSR MM32	118	DM24 Policy and	<i>Delete policy DM24:</i>

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		supporting text	<p>AFFORDABLE HOUSING</p> <p style="text-align: center;">POLICY DM24: Affordable Housing</p> <p>_____ Affordable housing provision will be required in accordance with policy CS12.</p> <p>The presumption will be in favour of on-site provision rather than the payment of commuted sums in lieu of provision.</p> <p>The Council will require that the affordable housing:</p> <ul style="list-style-type: none"> a. _____ is designed and built to at least the same standard as the market housing, including the appropriate level of the Code for Sustainable Homes at the time; b. _____ is integrated into developments and from external appearance should be indistinguishable from the market housing; c. _____ should not generally be grouped in clusters of more than 12-15 dwellings; and d. _____ has car parking provided at the same ratio as for the development as a whole. <p>The most appropriate type, size and mix, for each development will be guided by the Council's Affordable Housing Position Statement and the particular characteristics of the site.</p> <p>The type and mix of affordable dwellings required across the Borough will be as set out in policy CS12 and the most up-to-date Affordable Housing Position Statement. The requirement to avoid clusters of more than 12 to 15 affordable units is a general guide, with the main objective to achieve developments in which the affordable dwellings are truly integrated into the overall scheme. However, this can be exceeded where there is a demonstrable need for management purposes or where a scheme delivering over-and-above the policy requirement set within policy CS12 is proposed.</p>

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CSR MM33	119	DM25 Policy and supporting text	<p data-bbox="562 400 1787 501"><i>Amend DM25 to clarify that Futura Park is an Employment Area; broaden the definition of employment uses; and provide for residential redevelopment of certain employment sites outside the Employment Areas:</i></p> <p data-bbox="658 544 1727 603">The Employment Areas are defined on the policies map and the IP-One Area inset policies map and listed below:</p> <ol data-bbox="658 639 1727 1182" style="list-style-type: none"> 1 Ipswich Business Park, north of Whitton Lane; 2 White House Industrial Estate, White House Road; 3 Knightsdale Road / Wharfedale Road; 4 Boss Hall Industrial Estate; 5 Hadleigh Road Industrial Estate, including Elton Park; 6 Land south of London Road / east of Scrivener Drive; 7 Civic Drive / Princes Street / Russell Road / Portman Road; 8 Felaw maltings / IP-City Centre; 9 Riverside Industrial Park and the West Bank area; 10 Cavendish Street; 11 Holywells Close and Holywells Road; 12 Cliff Quay/Sandy Hill Lane / Greenwich Business Park / Landseer Road area; 13 Wright Road / Cobham Road; 14 The Drift / Leslie Road / Nacton Road; 15 Ransomes Europark; and 16 Airport Farm Kennels, south of Ravenswood; <u>and</u> 17 <u>Futura Park, Nacton Road.</u> <p data-bbox="658 1219 1727 1342">Sites and premises used and/or allocated for employment uses in Use Classes B1 Business, B2 General Industry or B8 Storage and Distribution, as defined by the Use Classes Order 1987 (as amended) and The defined Employment Areas will be safeguarded for employment and ancillary uses. <u>Employment uses are defined as:</u></p> <p data-bbox="658 1347 1798 1374"><u>i. B1 Business, B2 General Industry or B8 Storage and Distribution, as defined by the</u></p>

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			<p><u>Use Classes Order 1987 (as amended), with a town centre first approach to the location of offices; and</u></p> <p><u>ii. appropriate employment-generating sui generis uses.</u></p> <p><u>Small scale services specifically provided for the benefit of businesses based, or workers employed, within the Employment Area will also be permitted where:</u></p> <p><u>a. there is no reasonable prospect of the site being re-used for employment purposes over the plan period; and</u></p> <p><u>b. the proposed use is compatible with the surrounding uses.</u></p> <p><u>In the case of Starter Homes, these would only be permitted in Employment Areas where:</u></p> <p><u>c. there is no demand for continued use of the site for employment or commercial purposes as demonstrated by a marketing programme; and</u></p> <p><u>d. if the site is allocated for employment or commercial uses, it is demonstrated that there is no reasonable prospect of the site being used for the allocated use, or other uses as detailed under the terms of this policy, during plan period; and</u></p> <p><u>e. housing would be compatible with existing and planned surrounding uses.</u></p> <p><u>Outside the defined Employment Areas, the conversion, change of use or redevelopment of sites and premises in employment use to non-employment uses</u> <u>Permission for the conversion, change of use or redevelopment of such sites or premises to non- Class B1, B2 and B8 uses (except non-ancillary retail) will only be permitted where:</u></p> <p><u>a. f. there is no reasonable prospect of the site being re-used for employment purposes over the plan period; and or</u></p> <p><u>g. the proposed use is residential and it can be acceptably accommodated, would make more effective use of the site and would not harm the economic development strategy of the plan; and</u></p>

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			<p>a. in relation to f. and g., b-the proposed use is compatible with the surrounding uses <u>and is an appropriate use for the site.</u>; and</p> <p>c. it can be demonstrated to the Council's satisfaction that the alternative uses are employment-generating uses appropriate to the location with no reasonable prospect of locating elsewhere within the Borough; or</p> <p>d. it can be demonstrated to the Council's satisfaction that the proposed use is ancillary to and supports existing employment uses; or</p> <p>e. the site has been allocated for an alternative use in the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document.</p> <p>Outside the defined Employment Areas, change of use from B1, B2 or B8 to other uses may also be permissible if there is no reasonable prospect of the site being re-used for employment purposes over the plan period.</p> <p>In the case of Starter Homes, these would only be permitted where:</p> <p>f. there is no demand for continued use of the site for employment or commercial purposes as demonstrated by a marketing programme;</p> <p>g. where the site is allocated for employment or commercial uses it is demonstrated that there is no reasonable prospect of the site being used for the allocated use, or other uses as detailed under the terms of criteria a-e above, during plan period; and</p> <p>h. housing would be compatible with existing and planned surrounding uses.</p> <p><i>Amend 9.151 to refer to Futura Park Employment Area:</i></p> <p>9.151 New employment areas have been designated at Ipswich Business Park north of Whitton Lane (area 1 above), and Airport Farm Kennels south of Ravenswood (area 16 above) <u>and Futura Park (area 17 above)</u>. These reflect proposed employment land allocations set out in policy SP5 of the Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document,</p>

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			<p>which are needed to provide an adequate employment land supply in terms of quantity and quality.</p> <p><i>Amend 9.155 to define employment uses and clarify the approach to residential development:</i></p> <p>9.155 References to employment uses in this policy and reasoned justification refer only to B class uses unless otherwise specified, and exclude retail uses. <u>Appropriate employment-generating sui generis uses referred to in the policy include uses such as car showrooms with accompanying workshops and waste facilities and excludes any sui generis use which includes retail or leisure as anything other than an ancillary use. Small scale services could include small gyms or cafes (use classes D2 or A3) providing facilities targeted at people working in the area.</u></p> <p>9.156 The loss of employment land, whether in existing employment use or allocated for employment within a defined Employment Area, could affect the Council's ability to achieve its employment objectives and job targets. Land and buildings in employment use may also come under pressure from other forms of development that tend to have higher values such as retail, leisure and housing. As a general principle therefore, such land needs to be protected. Retail uses will not be permitted other than as small scale retailing ancillary to the main/B class use. <u>Residential use would only be permitted outside the Employment Areas where the criteria are met.</u> To demonstrate no reasonable prospect of re-use for employment purposes (B1, B2 or B8) over the plan period, applicants will be required to produce evidence that the site has been marketed actively for a continuous period of at least six twelve months from the date of the first advertisement for business (B1) general industrial (B2) or storage and distribution (B8) <u>employment uses as appropriate to the site.</u></p> <p><i>Amend 9.158 to refer to the possibility of review:</i></p> <p>9.158 The Council recognises the importance of retaining existing employment uses and allowing for their growth and development where this can be accomplished without giving rise to serious environmental problems or unacceptable increases in traffic. Where employment uses are no longer appropriate to their surroundings or cannot reasonably expand further on their existing sites they will be encouraged to relocate within Employment Areas. <u>The provisions of this policy (and the related allocations) may need to be reviewed in the light of the forthcoming joint work with neighbouring authorities on joint or aligned Local Plans and the NPPF requirement that allocations are regularly reviewed and that long term protection of employment sites should be avoided where there is no</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p><u>realistic prospect of their use.</u></p>
CSR MM34	125	DM29 Policy only	<p><i>Amend paragraph 3 of DM29 to clarify and simplify it in relation to the presumption in favour of on-site provision, and add flexibility:</i></p> <p>These developments would also be expected to mitigate their own impact through the provision of the various open space and facility typologies identified in Appendix 6. Where <u>the need for provision is triggered, applying the quantity standards based on a population forecast of the development would exceed the Council's minimum size threshold for the typology</u>, there will be a presumption in favour of on-site provision. Where this is not practicable or the Council prefers enhancement opportunities at existing facilities, <u>or the area generated by applying the standard is smaller than the Council's minimum size</u>, then an in lieu contribution to new or existing off-site provision should be secured through a planning obligation. <u>There may be circumstances where development would more suitably accommodate greater provision of one typology at the expense of another. Such circumstances will be considered on their merits.</u></p> <p><i>Amend paragraph 5 of DM29 to reflect the possibility of on-site provision and off-site enhancements:</i></p> <p>The effect of on-site provision <u>and/or</u> off-site enhancements on development viability will also be a consideration, although the resultant provision to account for this must not be at a level that the development would not be deemed sustainable in either social or environmental terms.</p> <p><i>Correct typographical error (delete 'be') in penultimate paragraph of policy and add text to provide flexibility for small, high density infill schemes:</i></p> <p>One-for-one replacement dwellings will be exempt from the requirements of the policy, because they are likely to have a minimal impact on the overall requirement. In addition, standards for children's and young people's facilities will be not be applied to elderly persons' accommodation and nursing homes. <u>On small, high density infill developments of 15 to 40 dwellings, the requirement for 15% on-site open space provision will be applied flexibly where it can be demonstrated that compliance would reduce the number of dwellings that can be delivered.</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
CSR MM35	128	DM30 Policy and supporting text	<p data-bbox="562 376 1742 411"><i>Move new paragraph of supporting text added at Pre-Submission Modifications Stage to the policy:</i></p> <p data-bbox="562 448 1458 483">The density of new housing development in Ipswich will be as follows:</p> <ul style="list-style-type: none"> <li data-bbox="658 515 1800 576">a. within the town centre, Ipswich Village and Waterfront, development will be expected to achieve a high density of at least 90 dwellings per hectare (dph); <li data-bbox="658 611 1800 703">b. within the remainder of IP-One, District Centres and an 800m area around District Centres, development will be expected to achieve a medium density of at least 40 dph (the average will be taken as 45 dph); and <li data-bbox="658 738 1771 799">c. elsewhere in Ipswich, low-density development will be required (the average will be taken as 35 dph). <p data-bbox="658 834 1397 869">Exceptions to this approach will only be considered where:</p> <ul style="list-style-type: none"> <li data-bbox="658 898 1704 959">d. the site location, characteristics, constraints or sustainable design justify a different approach; or <li data-bbox="658 994 1787 1029">e. a different approach is demonstrated to better meet all housing needs in the area. <p data-bbox="658 1058 1800 1249"><u>To ensure that dwellings, and especially flats, provide versatile and attractive living space that appeals to a wide audience and is therefore more sustainable in changing market conditions, the Council will require developers to meet the Nationally Described Space Standards set out in Technical Housing Standards – Nationally Described Space Standard (Communities and Local Government, 2015) unless it can be demonstrated that it would not be viable.</u></p> <p data-bbox="562 1289 1749 1377">(new paragraph) 9.181 In order to ensure that dwellings, and especially flats, provide versatile and attractive living space that appeals to a wide audience and is therefore more sustainable in changing market conditions, the Council will encourage developers to meet the Nationally Described Space</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			Standards as set out in Technical Housing Standards — Nationally Described Space Standard (Communities and Local Government, 2015).
CSR MM36	134	DM33 Policy only	<p><i>Amend DM33 to clarify that the green rim is not an impediment to development:</i></p> <p>The Council will seek to establish and enhance green corridors within the Borough and linking to adjacent open spaces and walking, cycling or riding routes.</p> <p>Green corridors are identified broadly on Plan 6 in the following locations:</p> <ol style="list-style-type: none"> a. Between Bramford Lane Allotments and Whitton Sports Centre playing fields and grounds, Whitton Church Lane and adjoining countryside; b. Between Christchurch Park, the Dales, playing fields north of Whitton Church Lane and adjacent countryside; c. Between Christchurch Park, the Fonnereau Way, green infrastructure within the Ipswich Garden Suburb development area and open countryside beyond; d. Between the Cemetery, Playing Fields at Tuddenham Road and adjacent countryside; e. Between Woodbridge Road and Bixley Heath via St Clement’s Hospital grounds; f. Between Alexandra Park and Orwell Country Park and surrounding countryside via Holywells Park, Landseer Park and Pipers Vale; g. Between the Gipping Valley path near Station Bridge and Belstead Brook Park and adjacent countryside via Bourne Park; h. Between Gippeswyk Park, Belstead Brook Park and adjoining countryside; i. Between Gippeswyk Park, Chantry Park and adjacent countryside; <u>and</u> j. Between the Wet Dock and Sproughton Millennium Green and adjacent countryside along the river corridor; <u>and</u> k. A green rim around the periphery of the town. <p>The River Orwell is also identified along its navigable length within the Borough.</p> <p>Development within the green corridors identified on Plan 6 will be expected to maintain, and where possible enhance, the corridor’s amenity, recreational and green transport functions. The Council will seek to establish attractive green links and to provide for public access wherever safe and practicable.</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p>Development proposals which relate closely to river banks will be required to provide for the improvement of public pedestrian and cycle paths along the site boundary relating to the river where appropriate and should enhance its appearance.</p> <p>Opportunities will be sought to link existing green corridors into a more continuous network through the layout of new development, the provision of new open spaces or public realm improvement.</p> <p><u>The Council will seek to establish and extend a publicly accessible green rim around the edge of the Borough as illustrated on Plan 6 in order to address the need within the Borough for access to Natural and Semi Natural Greenspace. The green rim will provide an ecological corridor and a recreational resource for people to use. Development at the edge of the built up area will be required to provide links within the green rim as part of their on-site open space provision.</u></p>
CSR MM37	136	DM34 Policy and supporting text	<p><i>Amend DM34 to provide more flexibility for development in the countryside:</i></p> <p>Within the countryside defined on the policies map, major development will only be permitted <u>if provided</u> it:</p> <p><u>a.</u> respects the character of the countryside; and it</p> <p><u>a.</u> is necessary to support a sustainable rural business including tourism, or</p> <p><u>b.</u> is a recreational use of land which retains its open character.</p> <p>In the case of the AONB, major development will only be permitted in exceptional circumstances in accordance with NPPF paragraph 116. The landscape and scenic beauty of the AONB should be conserved.</p> <p>Proposals for development in the countryside should:</p> <p>a. <u>b. m</u>Maintains the separation between Ipswich and surrounding settlements; <u>and</u></p> <p>b. <u>Avoid the loss of best and most versatile agricultural land where possible;</u></p> <p>c. <u>Avoid does not result in isolated dwellings locations; and</u></p> <p>d. <u>C</u>ontributes to the green rim and other strategic walking and cycling routes and wildlife corridors where appropriate. ; <u>and</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p>e. In the case of new housing, be a dwelling i) required for the efficient operation of an existing rural enterprise which cannot be met nearby; ii) required to secure the future of a heritage asset; iii) which re-uses a disused building and enhances the immediate setting; or iv) of exceptional and innovative design.</p> <p><u>Major development in the countryside will only be permitted if it satisfies a. to d. above and:</u></p> <p><u>a. e. is necessary to support a sustainable rural business including tourism, or</u> <u>b. f. is a recreational use of land which retains its open character; or</u> <u>g. is major residential development.</u></p> <p><u>In the case of the AONB, major development will only be permitted in exceptional circumstances in accordance with NPPF paragraph 116. The landscape and scenic beauty of the AONB should be conserved.</u></p> <p><u>Proposals for residential development of more than one dwelling would be considered in the context of criteria a. to e. above.</u></p> <p><i>Amend the supporting text to refer to neighbouring areas; refer to separation between settlements; and clarify the status of some areas of countryside:</i></p> <p>9.211 One of the principles of planning set out in the National Planning Policy Framework (NPPF) is that it should recognise the intrinsic character and beauty of the countryside. Together with peripheral designated open spaces, the countryside around the Ipswich urban area, <u>including in neighbouring districts</u>, provides an attractive setting for the town and links into its ecological and green corridor networks. The NPPF requires <u>planning to take account of the different roles and character of different areas and, therefore, it is appropriate to maintain separation between Ipswich and surrounding settlements.</u> The creation of sporadic and isolated development in the countryside that is not connected with the essential requirements of agriculture will be discouraged.</p> <p>9.213 The NPPF supports rural tourism and leisure developments which respect the character of the countryside. However, <u>isolated development homes</u> in the countryside should be avoided <u>unless there are special circumstances to justify them.</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification												
			<p>(new paragraph) Subject to infrastructure and highways constraints, there are some areas of countryside within the Borough boundary which have been assessed as having 'in principle' acceptability for housing through the Strategic Housing Land Availability Assessment. In the event that the infrastructure constraints can be addressed satisfactorily, any development would be required to meet the criteria in the <u>policy</u>.</p>												
CSR MM38	141	Chapter 10 Table 8B	<p><i>Amend paragraph 10.9 to delete reference to triggers:</i></p> <p>10.9 Policy CS10 Ipswich Garden Suburb states that the detailed strategic and neighbourhood infrastructure requirements for the Garden Suburb development of approximately 3,500 dwellings, and the triggers for delivery of the items of infrastructure are included in Table 8B below. Table 8B sets out those requirements and triggers, starting with the strategic infrastructure requirements for the whole Ipswich Garden Suburb area and then identifying the detailed neighbourhood infrastructure for each of the three neighbourhoods in turn.</p> <p><i>Amend table 8B to delete reference to trigger points and move some transport and access measures to the 'strategic infrastructure' section of the table:</i></p> <table border="1"> <thead> <tr> <th>Infrastructure theme</th> <th>Infrastructure</th> <th>Trigger point for delivery⁴</th> </tr> </thead> <tbody> <tr> <td colspan="3">Strategic Infrastructure</td> </tr> <tr> <td colspan="3">Note that dwelling numbers in this section of the table apply to the total number across the whole of the supplementary planning document (SPD) site unless otherwise stated.</td> </tr> <tr> <td><u>Access & transport</u></td> <td><u>Off-site junction improvements in surrounding road network</u></td> <td></td> </tr> </tbody> </table>	Infrastructure theme	Infrastructure	Trigger point for delivery ⁴	Strategic Infrastructure			Note that dwelling numbers in this section of the table apply to the total number across the whole of the supplementary planning document (SPD) site unless otherwise stated.			<u>Access & transport</u>	<u>Off-site junction improvements in surrounding road network</u>	
Infrastructure theme	Infrastructure	Trigger point for delivery ⁴													
Strategic Infrastructure															
Note that dwelling numbers in this section of the table apply to the total number across the whole of the supplementary planning document (SPD) site unless otherwise stated.															
<u>Access & transport</u>	<u>Off-site junction improvements in surrounding road network</u>														

⁴ Unless otherwise agreed with Ipswich Borough Council and included in the Infrastructure Delivery Plan to be submitted to and approved by the Council

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification	
				<p><u>Connection to the Urban Traffic Management and Control (UTMC) system</u></p>
		<p>Access & transport</p>	<p>Vehicular rail crossing <u>with road access connecting housing in Fonnereau and Henley Gate neighbourhoods and the District Centre in the Fonnereau neighbourhood.</u></p>	<p>Prior to the occupation of 300 dwellings in Henley Gate or as agreed with IBC in view of the sequencing of both Fonnereau and Henley Gate, unless this is otherwise required at an earlier point as informed by an agreed Transport Assessment for the whole development.</p>
			<p>Fonnereau Way cycle / pedestrian bridge across rail line.</p>	<p>Prior to the occupation of 300 dwellings in Henley Gate or as agreed with Ipswich Borough Council (IBC) in view of sequencing of both Fonnereau Village and Henley Gate, unless this is otherwise required at an earlier point as informed by Network Rail consultation.</p>
			<p>Phased delivery of bus services & bus priority measures.</p>	<p>Strategic phasing plan for delivery of service and bus priority measures to be agreed prior to the commencement of development.</p>
			<p>Improvements to strategic town centre & east-west footpaths / cycleways.</p>	<p>Strategic phasing plan for delivery of strategic improvements to be agreed prior to the commencement of development.</p>
			<p>Improvements to Westerfield Station and level crossing.</p>	<p>Contribution towards car & cycle parking provision (to include CCTV, lighting, landscaping and other associated infrastructure) and level crossing upgrade (where required by Network Rail) will be secured at an appropriate stage in the development.</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification		
				Controlled cycle / pedestrian crossing on Westerfield Road.	Prior to the first building occupation in both Fonnereau and Red House Villages.
				Traffic management scheme for Westerfield village, The Crofts and other locations.	Details of and timetable for delivery of scheme to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department.
			Education	1200 space secondary school (including sixth form facility) with site providing playing fields and recreational facilities that would be secured for use by the community.	Development will not be permitted to commence until arrangements are in place to secure the commencement of the construction of a secondary school within the SPD site in accordance with a timetable to be agreed. Phased contributions proportionate to pupil yield shall be secured throughout each stage of the development.
			Infrastructure theme	Infrastructure	Trigger point for delivery⁵
			Open space, recreation & play	Country Park with joint visitor / community centre (with potential for dual community centre use) for Henley Gate.	Phasing for tree planting and landscaping to be agreed and commenced at an early stage in the development of Henley Gate. Completion and land transfer of initial ancillary works to include visitor facility / community centre and works compound prior to the occupation of 500 dwellings in Henley Gate. Capital and maintenance contributions (or in-kind provision by the Henley Gate developer) and transfer of the remaining land will be secured at an appropriate stage in the development.
				Swimming contribution (off-site)	Contributions to be secured at an appropriate stage in the development and used to

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					enhance and maintain existing facilities.
			Community facilities	District & Local Centres including community buildings with integrated library facilities & police office (where required) alongside new health centre & reserved sites for community use.	Delivery linked to development of each neighbourhood – see entries in the Neighbourhood Infrastructure Tables which follow below.
				Funding for community development support officer(s).	Contributions to be secured on commencement of early phases of development to ensure officer(s) in post prior to first dwelling occupation.
			Utilities	Any strategic improvements to electricity & gas supply.	As required.
				Any strategic improvements to water supply.	As required.
				Any strategic improvements to sewerage system.	As required.
				Any strategic infrastructure needed to deliver low carbon development.	In accordance with agreed low carbon framework to be agreed prior to the commencement of development.
				Strategic SuDS infrastructure & connections.	In accordance with agreed phasing plan prior to the commencement of development.

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification		
			Infrastructure theme	Infrastructure	Trigger point for delivery ⁶
			Neighbourhood Infrastructure – Southern Fonnereau Neighbourhood Note that dwelling numbers in the section of the table below apply to total number in this neighbourhood alone unless otherwise stated.		
			Access & transport	Off-site junction improvements in surrounding road network.	Timetable for delivery to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department.
				Connection to the Urban Traffic Management & Control (UTMC) system.	Timetable for delivery to be informed by the Transport Assessment for the whole department in agreement with SCC Highways department.
				Travel Plan development, implementation & monitoring.	Travel Plan to be submitted and agreed with SCC Highways department as part of full / outline application for the development of the site. To be implemented and monitored during and following each phase of the neighbourhood development.
				Improvements to Fonnereau Way (complete section linking Valley Road & railway line).	Prior to occupation of 500 dwellings.
				Pedestrian and cycle signage	Contributions to be secured at an appropriate

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Mod. No.	Pg.	Policy / Paragraph	Proposed Modification		
				(monoliths).	stage in the development.
			Education & early years	2FE (form of entry) primary school & nursery with the potential for some facilities to be shared with the community.	Serviced site (with access roads) to be transferred prior to occupation of 100 dwellings. The need and timetable for the provision of a second form of entry will be reviewed following this. Phased contributions proportionate to pupil yield shall be secured throughout each stage of the development.
			Open space, recreation & play	Neighbourhood parks, allotments & open spaces with equipped sports & play facilities as per SPD Core Strategy Policy.	In accordance with phasing plan to be agreed prior to the commencement of development.
			Community infrastructure	District Centre supporting infrastructure (CCTV, electric charging points, recycling facility, cycle parking etc. as detailed in agreed infrastructure framework.	Prior to occupation of 500 dwellings.
				Community centre in District Centre with integrated library facilities, workspace hub and police office (where required by Suffolk Constabulary).	Temporary community centre to be provided prior to occupation of 50 dwellings. Permanent community centre with integrated facilities prior to occupation of 500 dwellings.
				Health Centre.	Serviced site within District Centre to be transferred at time to be agreed. Phased contributions for capital costs of providing health centre to be agreed.
			Other items	Household waste facilities (sum).	Contributions to be secured at an appropriate stage in the development.
				Superfast broadband infrastructure.	To be delivered in each phase of development in neighbourhood.
			Infrastructure theme	Infrastructure	Trigger point for delivery⁷
Neighbourhood Infrastructure – Northern Henley Gate Neighbourhood					

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Mod. No.	Pg.	Policy / Paragraph	Proposed Modification		
			Note that dwelling numbers in the section of the table below apply to total number in this neighbourhood alone unless otherwise stated.		
			Access & transport	Off-site junction improvements in surrounding road network.	Timetable for delivery to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department.
				Connection to the Urban Traffic Management & Control (UTMC) system.	Timetable for delivery to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department.
				Travel Plan development, implementation & monitoring.	Travel Plan to be submitted and agreed with SCC Highways department as part of full / outline application for the development of the site. To be implemented and monitored during and following each phase of the neighbourhood development.
				Improvements to Fonnereau Way (complete section linking railway line and Lower Road).	Prior to occupation of 500 dwellings.
				Pedestrian and cycle signage (monoliths).	Contributions to be secured at an appropriate stage in the development.
			Education & early years	2FE (forms of entry) primary school & nursery with the potential for some facilities to be shared with the community.	Serviced site (with access roads) to be transferred and 1FE primary school & nursery facility provided prior to occupation of 200 dwellings unless a revised timetable for delivery is otherwise agreed with IBC in conjunction with SCC Education department where sustainable access to another primary school & nursery with capacity is available. The need and timetable for the provision of a second form of entry will be reviewed following

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification		
					this. Phased contributions proportionate to pupil yield shall be secured throughout each stage of the development.
			Open space, recreation & play	Neighbourhood parks, allotments & open spaces with equipped sport & play facilities as per SPD Core Strategy policy.	In accordance with phasing plan to be agreed prior to the commencement of development.
			Community infrastructure	Local Centre supporting infrastructure (CCTV, electric charging points, recycling facility, cycle parking etc. as detailed in agreed infrastructure framework).	Prior to occupation of 500 dwellings.
				Community centre (may include workspace hub).	Delivery linked to provision of Country Park visitor centre.
				Reserved and serviced site for community use (up to 0.25ha).	Prior to occupation of 500 dwellings and agreed marketing strategy thereafter.
			Other items	Household waste facilities (sum).	Contributions to be secured at an appropriate stage in the development.
				Superfast broadband infrastructure.	To be delivered in each phase of development in neighbourhood.
			Infrastructure theme	Infrastructure	Trigger point for delivery⁸
			Neighbourhood Infrastructure – Eastern Red House Neighbourhood		
			Note that dwelling numbers in the section of the table below apply to total number in this neighbourhood alone unless otherwise stated.		
			Access & transport	Off-site junction improvements in surrounding road network.	Timetable for delivery to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department.

⁸ Unless otherwise agreed with Ipswich Borough Council and included in the Infrastructure Delivery Plan to be submitted to and approved by the Council

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification		
				Connection to the Urban Traffic Management & Control (UTMC) system.	Timetable for delivery to be informed by the Transport Assessment for the whole development in agreement with SCC Highways department.
				Travel Plan development, implementation & monitoring.	Travel Plan to be submitted and agreed with SCC Highways department as part of full / outline application for the development of the site. To be implemented and monitored during and following each phase of the neighbourhood development.
				Pedestrian & cycle signage (monoliths).	Contributions to be secured at an appropriate stage in the development.
		Education & early years		2FE (forms of entry) primary school & nursery with the potential for some facilities to be shared with the community.	Serviced site (with access roads) to be transferred and 1FE primary school & nursery facility provided prior to occupation of 200 dwellings unless a revised timetable for delivery is otherwise agreed with IBC in conjunction with SCC Education department where sustainable access to another primary school & nursery with capacity is available. The need and timetable for the provision of a second form of entry will be reviewed following this. Phased contributions proportionate to pupil yield shall be secured throughout each stage of the development.
		Open space, recreation & play		Neighbourhood parks, allotments & open spaces with equipped play & sports facilities as per SPD <u>Core Strategy Policy</u> .	In accordance with phasing plan to be agreed prior to the commencement of development.
		Community infrastructure		Local Centre supporting infrastructure (CCTV, electric charging points, recycling facility,	Prior to occupation of 500 dwellings.

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				cycle parking etc. as detailed in agreed infrastructure framework).	
				Reserved and serviced site for community use (up to 0.25ha).	Prior to occupation of 500 dwellings and agreed marketing strategy thereafter.
			Other items	Household waste facilities (sum).	Contributions to be secured at an appropriate stage in the development.
				Superfast broadband infrastructure.	To be delivered in each phase of development in neighbourhood.
CSR MM39	149	Chapter 11 Objectives 3, 5, 7, 8 and 11	<p><i>Amend Objectives 3 and 5 to align with policies CS7, CS10 and CS13:</i></p> <p>OBJECTIVE 3:</p> <p>At least (a) 9,777 <u>13,550</u> new dwellings shall be provided to meet the needs of Ipswich within the Housing Market Area between 2011 and 2031 in a manner that addresses identified local housing needs and provides a decent home for everyone, with at least 31% <u>35%</u> at the Ipswich Garden Suburb and 15% in the remainder of the Borough being affordable homes; and (b) approximately in the region of 12,500 additional jobs shall be provided in Ipswich to support growth in the Ipswich Policy Area between 2011 and 2031.</p> <p>TARGETS</p> <p>To deliver at least (a) 9,777 <u>13,550</u> homes by 2031 and approximately in the region of (b) 12,500 jobs by 2031</p> <p>OBJECTIVE 5:</p> <p>Opportunities shall be provided to improve strategic facilities in Ipswich by:</p> <ul style="list-style-type: none"> - Significantly enhancing the town centre in terms of the quantity and quality of the shops, the cultural offer and the network of public spaces; - Ensuring a new strategic employment site at Futura Park continues to be developed; 		

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p>- Extending the strategic greenspace, ecological network and canopy cover; and</p> <p>Continuing to support the development of <u>the University of Campus-Suffolk and Suffolk New College</u></p> <p><i>Amend Objective 7 target to specify the end of 2017 for completion of the tidal barrier, to tie in with paragraph 8.186 of the plan:</i></p> <p>TARGETS</p> <p>Implementation of the tidal surge barrier by <u>the end of 2017</u>.</p> <p><i>Amend objective 8 to correct reference to Heritage at Risk register:</i></p> <p>INDICATOR(S)</p> <ol style="list-style-type: none"> 1. Net change in extent of protected habitat. 2. Number of buildings on Suffolk Buildings at Risk register. 3. Number of buildings and conservation areas on Historic England Heritage Assets at Risk register. <p><i>Amend objective 11 to add an appropriate air quality indicator and targets:</i></p> <p>OBJECTIVE 11:</p> <p>To improve air quality and create a safer, greener more cohesive town.</p> <p>INDICATOR(S)</p> <ol style="list-style-type: none"> 1. Levels of participation in community events such as the IP-Art Festival. 2. Number of recorded air quality exceedances*.

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification
			<p>TARGETS</p> <p>To tie in with Police targets relating to reducing crime levels by 2031. <u>To achieve a 75 per cent reduction in the number of air quality exceedances recorded annually in Ipswich by 2031**.</u></p> <p><u>*An exceedance is defined as a diffusion tube monitoring point that exceeds the annual mean objective of 40 µg/m3, once bias adjustment has been accounted for.</u> <u>** At the beginning of the plan period (2011), Ipswich recorded 27 air quality exceedances after bias adjustment.</u></p>
CSR MM40	153	Appendix 1	<p><i>Delete reference to policies CS9 and DM24 which are proposed for deletion:</i></p> <p>Policy CS9: — Previously Developed Land</p> <p>Affordable Housing Policy DM24: — Affordable Housing</p> <p><i>Amend reference to DM9 to include structures:</i> Policy DM9: Buildings <u>and Structures</u> of Townscape Interest</p> <p><i>Add CS9 and DM24 to list of deleted policies:</i> The following policies from the Ipswich Core Strategy and Policies development plan document adopted December 2011 have been deleted (and material incorporated into other policies as appropriate):</p> <p><u>CS9 Previously Developed Land</u> DM7 Public Art DM11 Central Ipswich Skyline DM15 Travel Demand Management DM16 Sustainable Transport Modes DM19 Cycle Parking <u>DM24 Affordable Housing</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Modification

Appendix 2

IPSWICH BOROUGH COUNCIL LOCAL PLAN

Main Modifications to the Ipswich Borough Council Proposed Submission Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document

Key to the Main Modifications:

- Text in *italics* describes the Main Modification.
- Proposed additional text is shown as underlined. Proposed deleted text is shown as ~~struck through~~. Where unchanged text is included, it is to aid clarity only.
- Text shown as **bold** indicates that the text is a heading or a policy (as opposed to supporting text which is not in bold).
- SAP stands for Site Allocations Plan ('Site Allocations and Policies (incorporating IP-One Area Action Plan) development plan document').

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
SAP MM45	17	SP1 Policy and supporting text	<p><i>Amend paragraph 4.3 to reflect changes made to policy SP1 to improve flexibility:</i></p> <p>4.3 This policy introduces measures to reserve allocated sites for the uses proposed and thereby means any <u>inappropriate</u> alternative uses would be a departure from the development plan.</p> <p><i>Amend the policy to increase flexibility around retail uses (where there comply with the NPPF) and mixed use sites:</i></p> <p>Policy SP1 The protection of allocated sites</p> <p>Sites will be safeguarded for the use(s) for which they have been allocated. The Council will only permit alternative uses on allocated sites if they are compatible with other plan objectives <u>and policies</u>, they do not harm the plan strategy and the applicant can demonstrate that the allocated use is:</p> <p>a. <u>No longer needed to meet planned development needs; and or</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p style="text-align: center;">b. Not viable or deliverable for the allocated use and likely to remain so during the plan period.</p> <p><u>In terms of retail, the Central Shopping Area remains the focus for significant retail development. However, proposals for retail development over 200 sq m net will be permitted on sites allocated for other uses subject to:</u></p> <ul style="list-style-type: none"> • <u>satisfactorily addressing the sequential test and impact assessment in accordance with national policy; and</u> • <u>there being no significant conflict with the delivery of other requirements of the Plan, e.g. residential development to meet the identified housing need and any associated open space requirements.</u> <p><u>Where an allocated mix of uses is not viable or deliverable, the Council will prioritise the primary use and community uses (including open space) identified through the policies and the site sheet at Appendix 3A and negotiate the remainder of the mix.</u></p> <p><i>Amend paragraph 4.4 to provide clarity as to how clause b. will be interpreted:</i></p> <p>4.4 The Council has specific requirements for the delivery of housing, jobs and retail development in the period up to 2031. Sites are allocated in this plan to enable the targets to be met. The allocations need to be backed by policy to ensure that they cannot easily be developed for alternative uses and thereby harm the Council's ability to achieve its growth targets. <u>To demonstrate that the allocated use is not viable or deliverable in accordance with clause b., applicants will be required to produce evidence that the site has been marketed actively for a continuous period of at least twelve months from the date of the first advertisement for the allocated use.</u></p>
SAP MM46	17	SP2 Policy and supporting text	<p><i>Amend paragraph 4.5 to reflect the figures in Core Strategy Review policy CS7:</i></p> <p>4.5 Through Core Strategy review policy CS7 'The Amount of Housing Required', the Council commits to allocating land to provide at least an additional 4,734 <u>4,544</u> dwellings net to 2031. The following policy provides the detailed site allocations to deliver a proportion of that housing requirement. <i>(continued)</i></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification			
			<p><i>Amend allocation IP010a site area to reflect change to western boundary; allocation IP032 site area to reflect change to boundary; delete allocation IP165 as it has planning consent; correct the description of site IP059a; and update total indicative capacity accordingly:</i></p>			
IP010a	<p>Co-op Depot, Felixstowe Road</p> <p>Approximately 25% of the site is safeguarded for an extension to Rosehill School.</p>	<p>1.95 2.22 (c.75%)</p>	<p>66 75</p>	<p>45dph (DM30b)</p>	<p>M</p>	
IP032	<p>King George V Field, Old Norwich Road</p> <p>Allocated for 80% residential and 20% open space. The allocation is subject to the provision of replacement playing fields and ancillary facilities (e.g. changing rooms and spectator accommodation) in a suitable location.</p>	<p>3.54 3.7 (c.80%)</p>	<p>99</p>	<p>35dph (Development Brief)</p>	<p>S/M</p>	

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification					
			IP059a	Elton Park Industrial Estate, Hadleigh Road This is the western part of the employment area, formerly occupied by a factory. The eastern part adjacent to railway is retained as employment area (in neighbouring authority).	2.63	105	40dph (discussions with developer). Application 08/00365/OUT for 130 dwellings withdrawn.	S
			IP165	Eastway Business Park, Europa Way	2.08	94	As per approved scheme (13/00943/OUT)	S
				Total		1,929 <u>1,844</u>		
<p><i>Amend paragraph 4.7 to reflect revised Table 1 and revised Core Strategy Review policy CS7:</i></p> <p>4.7 The indicative capacity of the sites listed in the policy above is 1,934 <u>1,844</u> dwellings. These will contribute to meeting the <u>minimum housing requirement target</u> of 10,585 <u>9,777</u> dwellings by 2031, as identified through Policy CS7 of the Core Strategy review. In addition, the Core Strategy review allocates land for the development of approximately 3,500 dwellings at Ipswich Garden Suburb (the Ipswich Northern Fringe) through policy CS10, with around 2,800 <u>2,700</u> dwellings expected by 2031. The housing land requirement and supply figures are set out in Table 2 of the Core Strategy review. The likely delivery timescale shown in the policy shows the Council's expectation based on current knowledge; sites could come forward sooner than indicated.</p>								

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification												
SAP MM47	27	SP3 Policy and supporting text	<p>Update the date in the policy to reflect the 1st April 2015 baseline for the allocations, and update Table 3 to include IP165 moved across from policy SP2 because it has planning permission and amend the total accordingly:</p> <p>As at 1st April 20152014, the sites listed in Table 2 below have planning permission for residential development, student accommodation or mixed use development including residential use, which has not been implemented or has started and then stalled, or are awaiting the completion of a Section 106 Agreement. Should the permissions fail to be issued or implemented and lapse during the plan period or the development fail to come forward or be completed in accordance with the permission, the Council will protect the sites for residential use or residential-led mixed use.</p> <table border="1" data-bbox="622 719 1771 855"> <tr> <td><u>IP165</u></td> <td><u>Eastway Business Park, Europa Way</u></td> <td><u>2.08</u></td> <td><u>94</u></td> <td><u>As per approved scheme (13/00943/OUT)</u></td> <td><u>S</u></td> </tr> </table> <table border="1" data-bbox="622 892 1771 1019"> <tr> <td></td> <td>Total</td> <td></td> <td><u>1,897</u> <u>1,991</u></td> <td></td> <td></td> </tr> </table> <p><i>Amend 4.16 to refer to the University of Suffolk</i></p> <p>4.16 The success of <u>the University of Campus-Suffolk</u> is a priority for the Council. Sufficient student accommodation is needed to support the University's targets for student numbers and ensure that potential impacts on residential neighbourhoods can be managed. The University ...</p>	<u>IP165</u>	<u>Eastway Business Park, Europa Way</u>	<u>2.08</u>	<u>94</u>	<u>As per approved scheme (13/00943/OUT)</u>	<u>S</u>		Total		<u>1,897</u> <u>1,991</u>		
<u>IP165</u>	<u>Eastway Business Park, Europa Way</u>	<u>2.08</u>	<u>94</u>	<u>As per approved scheme (13/00943/OUT)</u>	<u>S</u>										
	Total		<u>1,897</u> <u>1,991</u>												
SAP MM48	29	SP4 Policy and supporting	<i>(Policy SP4 Land Protected for Gypsy and Traveller Sites was deleted at Pre-Submission Modifications stage)</i>												

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification												
		text													
SAP MM49	30	SP5 Policy and supporting text	<p><i>Amend introductory paragraph 4.25 to correct employment land figure:</i></p> <p>4.25 Core Strategy review policy CS13 refers to the allocation of at least 30ha <u>35ha</u> of employment land across the Borough to deliver jobs growth. The following policy addresses this requirement.</p> <p><i>Amend SP5 wording to allow appropriate, employment-generating sui generis uses on certain sites:</i></p> <p>The following sites are allocated for employment development within Use Classes B1, B2 or B8, either in their entirety or as part of mixed use developments as specified in Table 3. <u>Appropriate employment-generating sui generis uses, defined through policy DM25, will also be permitted where specified.</u></p> <p><i>Amend table 3 to add specific reference to appropriate, employment-generating sui generis uses to certain sites; add a new allocation IP141a Land at Futura Park; and amend the overall land total accordingly; amend the uses suitable at site IP140 Land north of Whitton Lane; and refer to the Area of Outstanding Natural Beauty in connection with IP152:</i></p> <p>Table 3 Land allocated for employment uses</p> <table border="1"> <thead> <tr> <th>Site</th> <th>Address</th> <th>Site Area ha</th> <th>Notes</th> </tr> </thead> <tbody> <tr> <td colspan="4">Sites for 100% employment uses (B1, B2, B8)</td> </tr> <tr> <td>IP058</td> <td>Former Volvo site, Raeburn Rd South</td> <td>5.82</td> <td>Suitable for B1 (excluding office use B1a), B2 or B8 <u>and appropriate employment-generating sui generis uses as</u></td> </tr> </tbody> </table>	Site	Address	Site Area ha	Notes	Sites for 100% employment uses (B1, B2, B8)				IP058	Former Volvo site, Raeburn Rd South	5.82	Suitable for B1 (excluding office use B1a), B2 or B8 <u>and appropriate employment-generating sui generis uses as</u>
Site	Address	Site Area ha	Notes												
Sites for 100% employment uses (B1, B2, B8)															
IP058	Former Volvo site, Raeburn Rd South	5.82	Suitable for B1 (excluding office use B1a), B2 or B8 <u>and appropriate employment-generating sui generis uses as</u>												

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification			
						<u>defined through policy DM25</u>
			IP067	Former British Energy Site	4.66	Suitable for B1 (excluding office use B1a), B2 or B8 <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u>
			IP094	Land to rear of Grafton House	0.31	Suitable for B1a office
			IP099	Part of former Volvo Site, Raeburn Road South	2.30	Suitable for B1 (excluding office use B1a), B2 or B8 <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u>
			IP140	Land north of Whitton Lane	6.93	<p>Suitable primarily for B1, with some B2 and B8 <u>and appropriate employment-generating sui generis uses as defined through policy DM25.</u></p> <p>Delivery expected in the medium to long term. Should be planned comprehensively as part of a larger scheme with adjacent land in Mid Suffolk but the two areas could come forward in phases.</p> <p>Subject to suitable access being provided.</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification			
			IP141a	<u>Land at Futura Park, Nacton Road</u>	7.1	<u>Suitable for employment uses B1b, B1c, B2, B8 and appropriate sui generis uses as defined through policy DM25.</u>
			IP146	Ransomes Europark (east)/Land around Makro	5.29	<p>Suitable for B1, B2 or B8 <u>and appropriate employment-generating sui generis uses as defined through policy DM25.</u></p> <p>Development shall design in wildlife corridors to maintain a linked network of habitats including the lagoon and the plantation.</p>
			IP147	Land between railway junction and Hadleigh Road	4.7	<p>Suitable for B1, B2 or B8 (excluding B1a office use) <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u></p>
			IP150c	Land south of Ravenswood	4.62	<p>Suitable for B1 <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u></p>
			IP152	Airport Farm Kennels	7.37	<p>A site for longer term development subject to access improvements. Suitable for B1 (excluding office use B1a), B2 or B8 <u>and appropriate employment-</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification			
						<u>generating sui generis uses as defined through policy DM25. Development will be subject to the preparation of a development brief to address matters including the nationally designated Area of Outstanding Natural Beauty.</u>
			Sub total		42.00 49.1	
			Sites allocated for employment uses with a mix of other uses (site area reduced accordingly although development may occupy entire ground floor of a multi-storey development, for example)			
			IP004	Bus depot Sir Alf Ramsey Way	1.07 (50%) = 0.53	50% employment as part of mixed use scheme with housing
			IP011b	Smart St / Foundation St	0.69 (20%) = 0.14	As part of mixed use scheme with housing
			IP015	West End Road surface car park	1.22 (10%) = 0.12	As part of mixed use scheme with car parking and some housing
			IP035	Key Street / Star Lane / Burtons (St Peter Port)	0.54 (30%) = 0.16	As part of mixed use scheme with B1 office, hotel, small scale retail and car parking

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification			
				<p>IP037 Island Site</p>	<p>6.02 (30%) = 1.8</p>	<p>B1 uses compatible with housing expected as part of mixed use redevelopment, plus the retention of boat related uses including boat building.</p> <p>The use proportions will be firmed up through the preparation of a master plan. See also Opportunity Area development principles and guidelines in Part C. Additional vehicular and foot/cycle access (including emergency access) will need to be provided to enable the site's development.</p>
				<p>IP043 Commercial Buildings & Jewish Burial Ground Star Lane</p>	<p>0.70 (20%) = 0.14</p>	<p>Suitable for B1 / leisure as within the town centre boundary, as part of a mixed use development with housing</p>
				<p>IP047 Land at Commercial Road</p>	<p>2.86 (40%) = 1.14</p>	<p>As part of a mixed use scheme with 40% housing and 20% public open space and enhanced river path. The B1a element could also include hotel and leisure uses.</p>
				<p>IP051 Old Cattle Market Portman Road</p>	<p>2.21 (80%) = 1.77</p>	<p>Prime town centre site for new B1a office development</p> <p>80% B1a and 20% main town centre uses such as hotel / leisure (excluding retail). Numerically like</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification			
						for like replacement of existing long-stay car parking provision in this area will be required prior to the parking being lost. Offices with large floor plates in an office campus design approach are likely to be developed.
			IP052	Land between Lower Orwell St & Star Lane	0.40 (20%) = 0.08	As part of mixed use scheme with housing. The site currently has planning permission for student accommodation but it is considered unlikely to proceed.
			IP054	Land between Old Cattle Market & star Lane	1.72 (70%) = 1.2	A key site linking the shopping centre and Waterfront - mixed use including significant B1a office to east of Turret Lane – may also need to provide for an extended electricity sub-station. Could include some short stay car parking.
			IP132	Former St Peters Warehouse Site, 4 Bridge Street	0.18ha / 0.05ha	B1a office, leisure, small scale retail as part of a mixed use scheme of 73 dwellings
			Sub total		7.13	

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification				
			<table border="1" data-bbox="696 268 1715 368"> <tr> <td data-bbox="696 268 813 368"></td> <td data-bbox="813 268 1093 368">TOTAL</td> <td data-bbox="1093 268 1245 368">49.13 <u>56.23</u></td> <td data-bbox="1245 268 1715 368"></td> </tr> </table> <p data-bbox="584 408 1872 507"><i>Correct paragraph 4.27 of the supporting text to accord with Core Strategy Review policy CS13 and amend explanatory text at paragraph 4.32 to refer to the appropriate, employment-generating sui generis uses and cross refer to other plan policies:</i></p> <p data-bbox="584 547 1872 646">4.27 Core Strategy review policy CS13 sets a target of in the region of <u>approximately 12,500 jobs</u> to be provided 2011-2031 through a number of measures, including the allocation of at least 35ha-30ha of land for employment development.</p> <p data-bbox="584 686 1872 1023">4.32 The sites allocated are reserved for Class B uses as identified in the Use Classes Order 1987 (as amended and updated), other than where a mix <u>of uses or appropriate employment-generating sui generis uses</u> are is specified in Table 3 above. On those sites allocated for a mix of uses including employment, the proportions indicated in the policy represent the Council's preferred outcome and form the basis of supply calculations. However, the figures are indicative other than in the case of open space requirements and community facilities, to help ensure that developments can be viably delivered. <u>Appropriate employment-generating sui generis uses are defined through policy DM25 and will need to comply with other plan policies including DM26.</u> Appendix 3 provides additional information about the sites allocated through this policy.</p>		TOTAL	49.13 <u>56.23</u>	
	TOTAL	49.13 <u>56.23</u>					
SAP MM50	40	SP10 Policy and supporting text	<p data-bbox="584 1066 1149 1091"><i>Amend policy to delete reference to floorspace:</i></p> <p data-bbox="584 1134 1872 1302">Site IP040 (formerly IP040 and IP041, now combined and extended) Land at Westgate is allocated for A1 retail-led mixed use development, which could include other uses provided the predominant retail use is delivered. This is the main site allocated for new large scale and large floor plate retail development during the plan period. The retail element should provide in the region of 15,000 sq m net of new retail floorspace.</p> <p data-bbox="584 1345 1570 1370"><i>Amend paragraphs 5.11 to 5.13 to remove references to a floorspace requirement:</i></p>				

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p>5.11 The focus should be on strengthening the existing centre, particularly the prime pitch, prioritising sites and supporting the delivery of one scheme in a development cycle (10 years) for new retail floorspace. This evidence has informed Core Strategy review policy CS14 <u>and policy SP10 above, which identifies a need for in the region of 15,000 sq m of net additional retail floorspace. However, policy CS14 does not identify a retail floorspace requirement. This will be set as part of a review of the plan scheduled to begin in 2016, and CS14 sets out how additional retail proposals will be considered in the interim period.</u></p> <p>5.12 Delivering new retail investment in town centres can be challenging in this economic climate, and therefore it is appropriate to plan for the delivery of one retail development within an economic cycle. The Westgate site is identified as a key opportunity to achieve this, as it is located in close proximity to the existing retail core and would build upon the existing well functioning retail centre. The focus is on ensuring delivery of a retail scheme at Westgate which would lever maximum benefit and further investment.</p> <p>5.13 Therefore, the only significant new floorspace proposed is at the Westgate site. New retail floorspace here goes towards meeting the quantitative shortfall over the plan period and helps to address the qualitative deficiencies in the town centre, such as the lack of choice of large floor plate shop units. A development brief will be prepared for the Westgate site. Appendix 3 provides additional information about the site allocated through this policy.</p>
SAP MM51	45	SP14 Policy only	<p><i>Amend policy SP14 to clarify that facilities will be protected throughout the Borough:</i></p> <p>The Council will support the retention and enhancement of existing facilities providing arts, cultural and tourism facilities, including visitor accommodation <u>throughout the Borough</u>. Alternative uses will only be considered where it can be demonstrated that the current use is either being satisfactorily relocated or is unviable or that the new use complements the arts, culture and tourism sectors and supports the vitality and viability of the town centre. Retail development would need to satisfy policy DM23.</p>
SAP	55	Opportunity	<i>Add scheduled monuments to the key:</i>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
MM52		Area Site Analysis Key	Please refer to Appendix 2A
SAP MM53	58	Opportunity Area A Island Site	<p><i>Amend site analysis and development options plans to remove buildings shown with a bold outline:</i></p> <p>Please refer to Appendix 2A</p> <p><i>Amend Development Opportunities guidance to delete 'max':</i></p> <ul style="list-style-type: none"> • Residential (max 50%) could include live-work units
SAP MM54	63	Opportunity Area B Merchant Quarter	<p><i>Delete from the Development Options map those development options shaded orange which to not equate with site allocations:</i></p> <ul style="list-style-type: none"> • <i>east of the bus station, north of Turret Lane;</i> • <i>Burton's, College Street;</i> • <i>north of Regatta Quay; and</i> • <i>east of St Mary at the Quay</i> <p>Please refer to Appendix 2A</p> <p><i>Amend second bullet of Development Principles to refer to the Tall Buildings policy DM6:</i></p> <ul style="list-style-type: none"> • Fine grain development of generally low rise (3 storeys) with increased scale at focal points, up to a maximum of 5 storeys, to reflect historic scale and grain. <u>Taller buildings may be permitted in the tall building arc defined through policy DM6.</u>
SAP MM55	67	Opportunity Area C Mint Quarter	<p><i>Delete from the Development Options map those development options shaded orange which to not equate with site allocations:</i></p> <ul style="list-style-type: none"> • <i>Church and land including car park at Upper Orwell Street/Bond Street.</i> <p>Please refer to Appendix 2A</p>
SAP	71	Opportunity	<i>Add to the Development Options map as an orange-shaded development option the primary school</i>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
MM56		Area D Education Quarter	<p><i>allocation made through the Plan, site reference IP258</i></p> <p>Please refer to Appendix 2A</p> <p><i>Update reference to University Campus Suffolk to refer to University of Suffolk:</i></p> <p>It includes the higher and further education sites occupied by University Campus Suffolk (<u>now the University of Suffolk</u>) and Suffolk New College.</p> <p><i>Amend Development Opportunities column heading to show that the percentage is indicative:</i></p> <p>Development Opportunities <u>(percentage is indicative)</u></p> <p><i>Amend Development Principles bullet 4 to refer to all conservation areas and address archaeology:</i></p> <ul style="list-style-type: none"> • Development to take account of <u>address</u> archaeology and Wet Dock, <u>Central and St Helen's Conservation Areas.</u>
SAP MM57	74	Opportunity Area E Westgate	<p><i>Delete from the Development Options map those development options shaded orange which to not equate with site allocations:</i></p> <ul style="list-style-type: none"> • <i>the vicarage to St Mary Elm, on the corner of Elm Street and Black Horse Lane which is excluded from allocation IP040</i> <p>Please refer to Appendix 2A</p>
SAP MM58	77	Opportunity Area F River and Princes Street	<p><i>Delete from the Development Options map those development options shaded orange which to not equate with site allocations:</i></p> <ul style="list-style-type: none"> • <i>Fison House, north of Grafton Way;</i> • <i>the Fire Station;</i>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
		Corridor	<ul style="list-style-type: none"> • <i>land west of IP094, fronting Constantine Road; and</i> • <i>Land west of IP047 Grafton Way, adjacent to Princes Street.</i> <p>Please refer to Appendix 2A</p> <p><i>Add reference to residential uses as part of mix within the sites adjacent to the river:</i></p> <p><u>Residential uses where appropriate within mixed use developments adjacent to the river</u></p>
			<p>Modifications to Appendix 3A Site Sheets</p>
SAP MM59	-	Appendix 3A Site IP005	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>The site is adjacent <u>close to the</u> Whitton Conservation Area and forms part of the approach and setting to the conservation area. Therefore, development will need to have regard to this. The Core Strategy and the published development brief for this site and the adjacent site IP032 King George V Playing Fields require the Conservation Area to be taken into account. <u>Any cumulative impacts on the conservation area with the development of adjacent site IP032 and site IP140 will need to be taken into account.</u></p> <p>In terms of archaeology, <u>the site lies on high ground above the Gipping Valley. The adjacent site IP032 this site has been subject to geophysical survey and a desk based assessment has been carried out for both sites. There is potential for remains of multiple periods on the site and trenched evaluation will be required.</u> evaluated and features of prehistoric and Roman date were identified over much of the site in the form of pits and boundary ditches. There is a need for archaeological excavation. There is no objection in principle to development but any permission will require a condition relating to archaeological investigation. <u>Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work).</u></p>
SAP MM60		Appendix 3A Site IP010a	<p><i>Add text to development constraints section linking to policy SP9 and list policy SP9:</i></p> <p>Site area: 1.95ha <u>2.22ha</u> (revised western boundary to Derby Road)</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification									
			<p>Proposed Allocation Policies SP2, & SP7 & SP9</p> <table border="1"> <thead> <tr> <th>Use(s)</th> <th colspan="2">Indicative capacity</th> </tr> </thead> <tbody> <tr> <td>Primary</td> <td>Residential</td> <td>66 75 (45dph on 75% of site*)</td> </tr> <tr> <td>Secondary</td> <td>School extension (approximately 25%)</td> <td>0.5ha</td> </tr> </tbody> </table> <p><u>Land should be reserved as part of the development of either IP010a or IP010b to facilitate development of a cycle and pedestrian bridge to link the District Centre with the housing to the north of the railway.</u></p>	Use(s)	Indicative capacity		Primary	Residential	66 75 (45dph on 75% of site*)	Secondary	School extension (approximately 25%)	0.5ha
Use(s)	Indicative capacity											
Primary	Residential	66 75 (45dph on 75% of site*)										
Secondary	School extension (approximately 25%)	0.5ha										
SAP MM61	-	Appendix 3A Site IP010b	<p><i>Add text to development constraints section and refer to policy SP9 in table heading:</i></p> <p>Proposed Allocation Policy SP2 & SP9</p> <p><u>Land should be reserved as part of the development of either IP010a or IP010b to facilitate development of a cycle and pedestrian bridge to link the District Centre with the housing to the north of the railway.</u></p>									
SAP MM62	-	Appendix 3A Site IP011a	<p><i>This was a new site sheet added at Pre-Submission Modifications stage. Add text to development constraints section about tree works, heritage assets and water requirements:</i></p> <p>It is close to an Air Quality Management Area (Star Lane) and just outside the Flood Zone and contains trees protected through a TPO <u>(an application for tree works may be needed).</u></p> <p>The site is adjacent to the Central Conservation Area, close to a <u>the grade II listed building (Tooley's Court) and Smart's Almshouses, contains a scheduled monument and lies within an area of archaeological importance.</u></p>									

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p>Development principles for the Merchant Quarter, within which this site is located, are set out in Chapter 6 of the Site Allocations and Policies plan (see 'Opportunity Area B').</p> <p><u>This site affects an area of archaeological importance within the area of the Anglo-Saxon and medieval town. The site lies over the line of the Anglo-Saxon and medieval town defences, and the 14th century Friary wall. Much of the site is a scheduled monument (List entry no: 1005985). Scheduled Monument Consent (SMC) is a legal requirement for any development which might affect a monument either above or below ground level. Historic England administers the SMC application process on behalf of the Secretary of State for Culture, Media and Sport and should be consulted at the earliest opportunity to discuss the nature of the development. SMC is a separate process from the planning system.</u></p> <p><u>There is a high potential for archaeological remains of national significance and detailed early pre-application discussions with Suffolk County Council Archaeological Service and Historic England would be required. Archaeology would be a major consideration for project costs and timescales. Proposals would need to be supported by programmes of pre-determination archaeological works which may include desk-based assessments, survey works and archaeological evaluation. Complex archaeological mitigation is likely to be required which could include watching briefs, full excavation and / or design scheme changes to allow for preservation in situ. Post-excavation analysis, assessment and reporting would also be necessary.</u></p> <p><u>The site is expected to require improvements to the existing water supply and foul sewerage networks to enable development.</u></p>
SAP MM63	-	Appendix 3A Site IP011b	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p><u>Air quality, flood risk, possible contamination, possible access constraints, TPO on site or nearby (an application for Tree Works may be needed). The site lies between the Central and Wet Dock Conservation Areas, close to the grade II* St Mary at Quay church, contains two scheduled monuments and lies within an area of archaeological importance.</u></p> <p>Development principles for the Merchant Quarter, within which the site is located, are set out in Chapter 6 of the Site Allocations and Policies plan (see 'Opportunity Area B'). Where possible, the site layout should allow for improvements to the Star Lane frontage such as footway and cycleway provision or widening, and</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p>tree planting.</p> <p>This site, within the Anglo-Saxon core and the Area of Archaeological Importance (IPS 413), includes three <u>two</u> separate Scheduled Monuments <u>areas of National Importance</u>, all relating to the Middle and Late Saxon town (SF 189b, 190 and 191; IPS 211, 212 and 213 List Entry numbers 1005986 and 1005985). As noted in Policy CS4, English Heritage consent Scheduled Monument Consent (SMC) is a legal requirement would be needed <u>is a legal requirement</u> for any development <u>which might affect a monument either above or below ground level</u>. Historic England administers the SMC application process on behalf of the Secretary of State for Culture, Media and Sport and should be consulted at the earliest opportunity to discuss the nature of the development. SMC is a separate process from the planning system. impacting on Scheduled sites and they should be consulted at the earliest opportunity.</p> <p><u>There is also a potential for nationally important archaeological remains outside of the scheduled areas. Detailed early pre-application discussions with Suffolk County Council Archaeological Service and Historic England would be required to agree the scope of required assessment, the principle of development and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Where development is accepted in principle archaeological remains will be complex, important and mitigation could involve significant costs and timescales.</u></p> <p>Where development is accepted in principle, archaeological remains will be complex, important and involve significant costs. Archaeological management will be a major consideration and should involve upfront assessment to inform design (e.g. to allow for preservation in situ of deposits or appropriate programmes of work). Outside the Scheduled areas, there is no objection in principle to development but any permission will require a condition relating to archaeological investigation. Archaeological costs have the potential to be relatively high.</p> <p>The site also lies between the Central and Wet Dock Conservation Areas and close to St Mary at Quay church therefore the potential impact of development on heritage issues will need to be carefully considered.</p>
SAP MM64	-	Appendix 3A Site IP012	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>Possible access constraints, close to an Air Quality Management Area, in an area of archaeological importance and there is possible contamination.</p> <p>This site lies in <u>is within</u> the historic core of Anglo-Saxon and medieval <u>core and Area of Archaeological</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p>Importance (IPS413) Ipswich, and could involve potentially high excavation costs. Necessary measures for archaeology should be addressed at an appropriate stage in the planning process. There is no objection in principle to development but any permission will require a condition relating to archaeological investigation. Archaeological costs have the potential to be relatively high. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales.</p> <p><u>The site also lies close to the Central Conservation Area and listed St Clement's Church. The site is adjacent to the Central Conservation Area and the listed St Clement's Church.</u></p>
SAP MM65	-	Appendix 3A Site IP031	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>In a flood zone, close to an AQMA, adjacent to a conservation area, part within an area of archaeological importance, and possible contamination (former petrol station and car workshop). Development would need to support the wildlife corridor function of the river which is a County Wildlife Site at this point.</p> <p><u>This site is within the Area of Archaeological Importance (IPS 413). Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work).</u></p> <p>This site lies along the bank of the Orwell, close to the Medieval church of St Mary at Stoke, which is Grade 1 listed. adjacent to the Stoke Conservation Area and the grade I listed Church of St Mary at Stoke. The conservation area is currently on the Heritage at Risk Register. Should development have significant below ground impacts, a condition would be recommended relating to archaeology.</p>
SAP MM66	-	Appendix 3A Site IP032	<p><i>Amend site area and add text to development constraints section relating to heritage assets:</i></p> <p>Site area: 3.54ha <u>3.7ha</u> (revised site boundary)</p>

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			<p>Possible access constraints, adjacent to Whitton Conservation Area, and possible contamination. Trees on southern boundary protected by a TPO. Any cumulative impacts on the conservation area with the development of the adjacent site IP005 will need to be taken into account.</p> <p><u>In terms of archaeology, the site lies on high ground above the Gipping Valley. It has been subject to geophysical survey, and a desk based assessment has been carried out for both this site and the adjacent site IP005. There is potential for remains of multiple periods on the site and trenched evaluation will be required. This site has been evaluated for archaeology and features of prehistoric and Roman date were identified over much of the site in the form of pits and boundary ditches. There is a need for archaeological excavation.</u> There is no objection in principle to development but any permission will require a condition relating to archaeological investigation.</p> <p><u>The site is close to the Whitton Conservation Area. The Core Strategy and the published development brief for this site and the adjacent IP005 Took's Bakery require the Conservation Area to be taken into account. Any cumulative impacts on the conservation area with the development of adjacent site IP005 and site IP140 will need to be taken into account.</u></p>
SAP MM67	-	Appendix 3A Site IP035	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>Access constraints, within an Air Quality Management Area, in an area of archaeological importance and a conservation area, possible contamination, in a flood zone and listed buildings on or adjacent to the site.</p> <p><u>The site contains the grade II listed 1-5 College Street, adjoins the grade I listed and scheduled monument of Wolsey's Gate and lies within an area of archaeological importance. It is located between two conservation areas (Central and Wet Dock) and two grade II* listed churches (St Peter's and St Mary at the Quay).</u></p> <p>Detailed early pre-application discussions with Suffolk County Council Archaeological Service and Historic England would be required in order to agree the scope of required assessment, the principle of development and to inform designs (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). <u>Where appropriate to development impacts, Total archaeological excavation of any development footprint prior to development will be required. Where development is accepted in principle, archaeological remains will be complex and important, and mitigation could involve significant costs and</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p><u>timescales</u>. Mitigation on this site is likely to be extensive and expensive.</p> <p>This very sensitive site forms part of the transition area from the town centre to the waterfront where development needs to reflect this transition in terms of design and scale etc. <u>Wolsey's Gate is a scheduled monument (List Entry No. 1006071)</u>. <u>Proposals impacting upon its setting would require detailed pre-application discussions</u>. <u>The site presents opportunities for enhancing the setting of this scheduled monument</u>. <u>Scheduled Monument Consent (SMC) is a legal requirement for any development which might affect a monument either above or below ground level</u>. <u>Historic England administers the SMC application process on behalf of the Secretary of State for Culture, Media and Sport and should be consulted at the earliest opportunity to discuss the nature of the development</u>. <u>SMC is a separate process from the planning system</u>.</p>
SAP MM68	-	Appendix 3A Site IP037	<p><i>Add reference to policy SP16 and add text to development constraints section relating to heritage assets and Enterprise Zone status:</i></p> <p>Proposed Allocation Policies SP2, SP5, SP6, & SP15 & SP16</p> <p>Redevelopment will be dependent on the intentions of existing businesses. The aim would be retain and incorporate the existing boat-related uses and leisure uses. Development would require the provision of additional vehicular and pedestrian/cycle access (see Policy SP9), including the provision of access for emergency vehicles as a priority. Any additional access would need to be risk assessed. <u>Part of the Island Site now has Enterprise Zone status</u>.</p> <p>It is close to an AQMA, in an area of archaeological importance, forms a large part of the Wet Dock Conservation Area, is in a flood zone, and close to the Orwell Estuary Special Protection Area. Its proximity to the Special Protection Area may necessitate an Appropriate Assessment of development proposals under the Habitat Regulations.</p> <p><u>This site is within the Area of Archaeological Importance (IPS 413)</u>. <u>There may be archaeological issues in relation to industrial heritage</u>. <u>Historic buildings should be assessed</u>. <u>Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p><u>programmes of work).</u></p> <p>The granting of any permission will require a condition relating to archaeological investigation. There may be archaeological issues in relation to industrial heritage. Historic buildings should be assessed.</p> <p><u>The site forms a large part of the Wet Dock Conservation Area.</u></p>
SAP MM69	-	Appendix 3A Site IP039a	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>In a flood zone, close to an Air Quality Management Area, adjacent to a listed building and conservation area, within area of archaeological importance, and possible contamination. Development principles for the Island Site Opportunity Area, within which the site is located, are set out in Chapter 6 of the Site Allocations and Policies plan (see 'Opportunity Area A').</p> <p>In terms of archaeology, t <u>The site lies immediately adjacent to a large area of Anglo-Saxon and Medieval occupation at Stoke Quay core (IPS 683) and the Area of Archaeological Importance (IPS 413). There is high potential for Middle Saxon archaeology. There is no objection in principle to development but any permission will require a condition relating to archaeological investigation. Archaeological costs have the potential to be relatively high. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales.</u></p> <p><u>The site is adjacent to the Stoke Conservation Area and a listed building.</u></p>
SAP MM70	-	Appendix 3A Site IP040 & IP041	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>The site is adjacent to the Central Conservation Area and the Burlington Road Conservation Area lies a little further away to the west. Grade II* St Matthews Church (Grade II* listed) also lies to the west. Development principles for Westgate Opportunity Area, within which the site is located, are set out in Chapter 6 of the Site Allocations and Policies plan (see 'Opportunity Area E'). This site lies in the historic core of Anglo-Saxon and medieval Ipswich. Archaeological costs have the potential to be relatively high.</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p><u>This site is within the Anglo-Saxon and medieval core and the Area of Archaeological Importance (IPS 413). Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales.</u></p>
SAP MM71	-	Appendix 3A Site IP043	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>Access <u>constraints, within an Air Quality Management Area, area of archaeological importance and a flood risk area.</u></p> <p>This is a sensitive site in heritage terms, located partly within the Central Conservation Area; it and containing G grade II listed buildings and adjoining others, including the G grade II* 54-58 Fore Street to the north-east, the G grade II* Old Custom House to the south-west and the complex of highly graded buildings at Isaac Lord to the south-east. The site lies within an area of archaeological importance. The site presents opportunities for enhancing the Jewish burial ground which needs to be carefully respected by any development proposal.</p> <p>It is considered unlikely to come forward for student accommodation as per an extant permission for the site (11/00267/FUL), hence its inclusion in policy. Development principles for the Merchant Quarter, within which the site is located, are set out in Chapter 6 of the Site Allocations and Policies plan (see 'Opportunity Area B').</p> <p>This site is within the urban core <u>and area of archaeological importance (IPS 413)</u> and previous archaeological evaluation and limited excavation has revealed Anglo-Saxon and Medieval remains in particular (IPS 639, 371,372, 358). There is outstanding post-excavation work under IP/11/00267} and further work would be needed across the site. <u>There is potential for archaeological remains of possible national significance.</u> Detailed early pre-application discussions with Suffolk County Council Archaeological Service and Historic England would be required in order to agree the scope of required assessment, the principle of development and to inform design. <u>Where development is accepted in principle, archaeological</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification									
			remains will be complex and important, and mitigation could involve significant costs and timescales. Archaeological costs have the potential to be relatively high.									
SAP MM72	-	Appendix 3A Site IP047	<p><i>This was a new site sheet added at Pre-Submission Modifications stage. Amend indicative capacity and mix of uses to align with the allocation through policy SP2; indicate that the residential capacity is a minimum; add reference to policy SP5 and office use; and add text to development constraints section about transport and water requirements:</i></p> <p>Proposed Allocation Policies SP2, SP5 & SP6</p> <table border="1"> <thead> <tr> <th>Use(s)</th> <th></th> <th>Indicative capacity*</th> </tr> </thead> <tbody> <tr> <td>Primary</td> <td>Residential</td> <td>129 (90dph on 50%) <u>103 (90dph on 40%) this is a minimum figure</u></td> </tr> <tr> <td>Secondary</td> <td>Hotel, leisure, <u>B1 office</u> Public open space and enhanced river path</td> <td>Min 20% of the site to form public open space and enhanced river path – 0.54ha</td> </tr> </tbody> </table> <p><u>A transport assessment will be needed for this site due to its scale, location and the proposed uses, and it may identify the need to contribute towards significant off-site highway mitigation, depending on the detail of the scheme.</u></p> <p><u>The site is expected to require improvements to the existing water supply and foul sewerage networks to enable development.</u></p>	Use(s)		Indicative capacity*	Primary	Residential	129 (90dph on 50%) <u>103 (90dph on 40%) this is a minimum figure</u>	Secondary	Hotel, leisure, <u>B1 office</u> Public open space and enhanced river path	Min 20% of the site to form public open space and enhanced river path – 0.54ha
Use(s)		Indicative capacity*										
Primary	Residential	129 (90dph on 50%) <u>103 (90dph on 40%) this is a minimum figure</u>										
Secondary	Hotel, leisure, <u>B1 office</u> Public open space and enhanced river path	Min 20% of the site to form public open space and enhanced river path – 0.54ha										
SAP MM73	-	Appendix 3A Site IP048	<p><i>Add text to development constraints section relating to heritage assets and local listing:</i></p> <p>Close to an Air Quality Management Area, <u>possible contamination and TPOs on site or nearby (an</u></p>									

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p>application for tree works may be needed). The locally listed façade to Carr Street is to be retained locally listed. The site lies within and in an area of archaeological importance, contains a large scheduled monument and is adjacent to the Central Conservation Area, and two Grade II listed churches (Christ Church and St Pancras) and other listed buildings to the south. Possible contamination and TPOs on site or nearby (an application for Tree Works may be needed). The locally listed façade to Carr Street is to be retained.</p> <p>Development principles for the Mint Quarter / Cox Lane regeneration area, within which the site is located, are set out in Chapter 6 of the Site Allocations and Policies development plan document (see 'Opportunity Area C').</p> <p>The site lies within the area of archaeological importance (IPS 413) and much of it this site is lies within a scheduled monument relating to the Middle and Late Saxon town, preserved under current car parks (List entry No 1005983), therefore separate Scheduled Monument Consent (SMC) is a legal requirement for any development which might affect a monument either above or below ground level. Historic England administers the SMC application process on behalf of the Secretary of State for Culture, Media and Sport and should be consulted at the earliest opportunity to discuss the nature of the development. SMC is a separate process from the planning system. will need to be obtained in addition to planning permission from Historic England and they should be consulted at the earliest opportunity.</p> <p>There is also potential for nationally important archaeological remains outside the scheduled areas. The scheduled area represents a large portion of the Anglo-Saxon and medieval town, preserved under current car parks. There would be extremely high archaeological costs associated with development. Due to the high potential for archaeological remains of national significance, Detailed early pre-application discussions with Suffolk County Council Archaeological Service and Historic England would be required in order to agree the principle of development and inform designs (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Excavations and interventions have taken place in parts of the site and revealed evidence for occupation and activity from the Middle Saxon period onwards - the rest of the site is undisturbed from modern development under car parks and is anticipated to contain rich and well preserved archaeological remains. Development would require full assessment prior to the granting of consent to any proposals - desk based assessment, building survey and field evaluation. Where</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<u>development is accepted in principle, archaeological remains will be complex and important, and mitigation could involve significant costs and timescales.</u>
SAP MM74	-	Appendix 3A Site IP049	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>Within a flood zone, and an area of archaeological importance and close to an Air Quality Management Area and there may be contamination. It is adjacent to a conservation area the Wet Dock Conservation Area. and there may be contamination.</p> <p><u>The site is within the Area of Archaeological Importance (IPS413). This site has potential for evidence relating to exploitation of the foreshore from the Middle Saxon period onwards, as well as potential for remains relating to medieval and post-medieval shipyards. Buildings on the site should be assessed. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales. and it will require a condition relating to archaeological investigation attached to any planning consent.</u></p>
SAP MM75	-	Appendix 3A Site IP052	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>Within an Air Quality Management Area, and an area of archaeological importance and The site is adjacent to the Central Conservation Area, scheduled monuments, grade a conservation area, and a Grade II* listed building to the north (24 Fore Street) and a Grade II 26-28 Fore St.</p> <p>Possible contamination and part within a flood zone.</p> <p>Development principles for the Merchant Quarter, within which the site is located, are set out in Chapter 6 of the Site Allocations and Policies plan (see 'Opportunity Area B').</p> <p><u>In terms of archaeology, this site is within the urban core (IPS 413) and close to scheduled areas of Middle Saxon and medieval occupation (SF 189-191). It is within the street pattern area close to the waterfront and</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p>is likely to contain complex and important archaeological remains that will involve potentially high excavation costs. There is no objection in principle to development but any permission will require a condition relating to archaeological investigation. Archaeological costs have the potential to be relatively high.</p> <p><u>This site is within the urban core and the Area of Archaeological Importance (IPS 413) and close to scheduled areas of Middle Saxon and medieval occupation (NHLE 1005985 and NHLE 1002966). There is a potential for nationally important archaeological remains outside of scheduled areas. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales.</u></p>
SAP MM76	-	Appendix 3A Site IP054	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p><u>The site is within or close to an Air Quality Management Area and part within a flood zone at the southern end of the site. There are TPOs on site or nearby (an application for Tree Works may be needed). The site is also within an area of archaeological importance, partly within the Central Conservation Area, contains a scheduled monument and two grade II listed buildings (18-20 Lower Brook Street). The site is flanked by the rest of the Central conservation area and several listed buildings, with two grade II* churches to the south.</u></p> <p>There is a need to protect land for an extension to the electricity sub-station or new provision within the site. Part of the Lower Brook Street frontage is within a conservation area and should be retained. <u>The route of Turret Lane should be protected in development proposals.</u></p> <p>It is within or close to an Air Quality Management Area, in an area of archaeological importance, and part within a flood zone at the southern end of the site. There are TPOs on site or nearby (an application for Tree Works may be needed). The site is partly within the Central Conservation Area and contains two Grade II listed buildings (18-20 Lower Brook Street). The site is flanked by the Central conservation area and several listed buildings, with two Grade II* churches to the south.</p> <p><u>This site lies within the area of archaeological importance (IPS 413) and contains a scheduled monument (split over two separate areas) relating to includes two scheduled areas of the Anglo-Saxon and medieval</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification				
			<p>town of Ipswich (SF 192 a and b List Entry No 1005987), which are statutorily protected as of National importance. Parts of the area have been investigated (IPS 214), IPS 369, and IPS 574). This The latter found a wood-lined well with an assemblage of boar tusks, demonstrating good potential for the survival of wet and well preserved organic deposits. As noted in Policy CS4, English Heritage Scheduled Monument Consent (SMC) is a legal requirement for any development which might affect a monument either above or below ground level. Historic England administers the SMC application process on behalf of the Secretary of State for Culture, Media and Sport and should be consulted at the earliest opportunity to discuss the nature of the development. SMC is a separate process from the planning system. would will need to be needed obtained from Historic England for any development on works within scheduled sites monuments and they should be consulted at the earliest opportunity.</p> <p>There is also a potential for nationally important archaeological remains outside the scheduled areas. Detailed pre-application discussions with Suffolk County Council Archaeological Service and Historic England would be required in order to agree the principle of development and inform design (e.g. to allow preservation in-situ of deposits or appropriate programmes of work). Where development is accepted in principle, archaeological remains will be complex, and important, and mitigation could involve significant costs and timescales. The route of Turret lane should be protected in development proposals.</p>				
SAP MM77	-	Appendix 3A Site IP058	<p>Add text to allocation table to refer to sui generis uses:</p> <table border="1" data-bbox="602 987 1845 1211"> <thead> <tr> <th data-bbox="602 987 1375 1059">Use(s)</th> <th data-bbox="1375 987 1845 1059">Indicative capacity</th> </tr> </thead> <tbody> <tr> <td data-bbox="602 1059 1375 1211">Industrial (B-Class or similar Sui-Generis uses excluding offices in accordance with DM25) and appropriate employment-generating sui generis uses as defined through policy DM25</td> <td data-bbox="1375 1059 1845 1211">20,000sqm</td> </tr> </tbody> </table>	Use(s)	Indicative capacity	Industrial (B-Class or similar Sui-Generis uses excluding offices in accordance with DM25) and appropriate employment-generating sui generis uses as defined through policy DM25	20,000sqm
Use(s)	Indicative capacity						
Industrial (B-Class or similar Sui-Generis uses excluding offices in accordance with DM25) and appropriate employment-generating sui generis uses as defined through policy DM25	20,000sqm						
SAP MM78	-	Appendix 3A Site IP061	<p>Add text to development constraints section relating to heritage assets:</p> <p>In terms of archaeology, this site is in the vicinity of a Bronze Age cremation (IPS017), and Roman and Iron Age finds (IPS 034, IPS 185). It has been subject to geophysical survey and some follow up test pits which identified areas of recent overburden but did not reveal major archaeological features. Trial trenching of</p>				

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification				
			<u>this site should be carried out in order to further characterise archaeological remains. Evaluation should be undertaken early in the project management to allow mitigation and investigation strategies to be developed. Sparse remains might be anticipated. Depending on the nature of ground works, a condition may be recommended on any grant of permission to secure a programme of archaeological works.</u>				
SAP MM79	-	Appendix 3A Site IP067	<p><i>Add text to allocation table to refer to sui generis uses:</i></p> <table border="1"> <thead> <tr> <th>Use(s)</th> <th>Indicative capacity</th> </tr> </thead> <tbody> <tr> <td>Industrial (B-Class or similar Sui Generis uses excluding office uses in accordance with DM25) and appropriate employment-generating sui generis uses as defined through <u>policy DM25</u></td> <td>20,000sqm</td> </tr> </tbody> </table>	Use(s)	Indicative capacity	Industrial (B-Class or similar Sui Generis uses excluding office uses in accordance with DM25) and appropriate employment-generating sui generis uses as defined through <u>policy DM25</u>	20,000sqm
Use(s)	Indicative capacity						
Industrial (B-Class or similar Sui Generis uses excluding office uses in accordance with DM25) and appropriate employment-generating sui generis uses as defined through <u>policy DM25</u>	20,000sqm						
SAP MM80	-	Appendix 3A Site IP089	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p><u>It is part within a conservation area and adjacent to a listed building. Contains fragment of the Ipswich Ragged School, founded 1849. The site is partly within Central Conservation Area and adjacent to listed buildings. It contains a fragment of the Ipswich Ragged School, founded in 1849.</u></p> <p>TPOs on site (an application for Tree Works may be needed), within an area of archaeological importance, possible contamination and close to an Air Quality Management Area. May need to incorporate some parking at northern end of site to Co-op Education Centre. Surface water flooding local to site - will need to be considered at planning application stage. See Appendix 1 of the Ipswich SFRA.</p> <p><u>This site is a large area in the Anglo-Saxon and Medieval core and within the Area of Archaeological Importance (IPS 413). of Ipswich. There is no archaeological objection in principle to development but any permission will require a condition relating to archaeological investigation attached to any planning consent. Archaeological costs have the potential to be relatively high. Early, upfront evaluation would be advisable. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for</u></p>				

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<u>preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales.</u>
SAP MM81	-	Appendix 3A Site IP090	<p><i>This was a new site sheet added at Pre-Submission Modifications stage. Add text to development constraints section about water requirements:</i></p> <p><u>The site is expected to require improvements to the existing water supply and foul sewerage networks to enable development.</u></p>
SAP MM82	-	Appendix 3A Site IP094	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>Access constraints, possible contamination, flood risk and there is a TPO adjacent to the site (an application for Tree Works may be needed). Surface water flooding local to site - will need to be considered at planning application stage. See Appendix 1 of the Ipswich SFRA. A transport assessment and travel plan will be required. Vehicular access to West End Road may not be acceptable. There is no archaeological objection in principle to development, but any permission will <u>may</u> require a condition relating to archaeological investigation, <u>depending on the nature of the groundworks.</u></p>
SAP MM83	-	Appendix 3A Site IP096	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>Within Ipswich Village, housing densities should be high (Policy DM30) therefore the capacity has been increased. The development by McCarthy and Stone on the site to the west also suggests that high density may be appropriate here. Design and layout would need to support the wildlife corridor function of the canal which is also a County Wildlife Site and Local Nature Reserve. The site is part within the flood plain and opposite a conservation area. There is also possible contamination on site. Surface water flooding local to site - will need to be considered at planning application stage. See Appendix 1 of the Ipswich SFRA.</p> <p>This site is close to Roman, Anglo-Saxon and prehistoric excavated sites. It has <u>a high potential for archaeological remains. Archaeological costs have the potential to be relatively high.</u> Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). <u>Archaeological remains may be complex and important and mitigation</u></p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification				
			<p><u>could involve significant costs and timescales.</u></p> <p><u>The site is opposite Burlington Road Conservation Area.</u></p>				
SAP MM84	-	Appendix 3A Site IP099	<p><i>Add text to allocation table to refer to sui generis uses:</i></p> <table border="1"> <thead> <tr> <th>Use(s)</th> <th>Indicative capacity</th> </tr> </thead> <tbody> <tr> <td>Industrial (B-Class excluding office uses, or similar Sui Generis uses in accordance with DM25) <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u></td> <td>10,000sqm</td> </tr> </tbody> </table>	Use(s)	Indicative capacity	Industrial (B-Class excluding office uses, or similar Sui Generis uses in accordance with DM25) <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u>	10,000sqm
Use(s)	Indicative capacity						
Industrial (B-Class excluding office uses, or similar Sui Generis uses in accordance with DM25) <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u>	10,000sqm						
SAP MM85	-	Appendix 3A Site IP105	<p><i>Amend text to development constraints section relating to heritage assets:</i></p> <p>This site affects an area of archaeological interest, on land formerly in the low lying plains of the River Gipping. There is potential for palaeo-environmental remains to exist. The likely site of a medieval watermill at Kettlebaston (KBA 014) is indicated by field names and the alignment of the river less than 200m upstream. This shows activity in the area, and Saxon remains were recorded at IPS 395 in a similar topographic location to the site, PDA 250m to the west. There is no objection in principle to development, but any permission will require a condition relating to archaeological investigation. A desk-based assessment in the first instance will establish impacts of past land use.</p>				
SAP MM86	-	Appendix 3A Site IP132	<p><i>This was a new site sheet added at Pre-Submission Modifications stage. Add text to development constraints section about heritage assets and water requirements:</i></p> <p><u>The site contains the grade II listed No. 4 College Street and lies within an area of archaeological importance and the Central Conservation Area. It is located adjacent to the Wet Dock Conservation</u></p>				

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p><u>Area and close to, and within the setting of, the grade II* listed Church of St Peter and the scheduled monument of Wolsey's Gate. Archaeology – this</u></p> <p><u>The site lies in an area of international archaeological importance (IPS 413), on the Anglo-Saxon and medieval waterfront of Ipswich (Historic Environment Record IPS 413). This site potentially represents that last surviving section of 'early' waterfront. There is high potential for archaeological remains of possible national significance, such as important waterlogged remains and the potential, and may also encounter the remains of bridges dating from at least the 10th century.</u></p> <p><u>Detailed early pre-application discussion with Suffolk County Council Archaeological Service and Historic England would be required to agree the scope of required assessment, the principle of development and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Where development is accepted in principle, archaeological remains will be complex and important and mitigation could involve significant costs and timescales.</u></p> <p><u>The site will involve potentially high excavation costs. Measures for archaeology should be addressed at an appropriate stage in the planning process. Early consultation and evaluation is advised so that decisions can be taken on preservation in-situ, and/or appropriate investigation strategies designed</u></p> <p>The site is within the Flood Zone and within the Air Quality Management Area.</p> <p><u>The site is expected to require improvements to the existing water supply and foul sewerage networks to enable development.</u></p>
SAP MM87	-	Appendix 3A Site IP133	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>Site previously had permission for 47 flats and ground and first floor commercial uses B1, A3 and retail with underground car park (now lapsed). Site lies within the Ipswich Waterfront, is within an area of archaeological importance, in Flood Zone 2 and 3 and has an Article 3 direction on it restricting permitted development rights.</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<u>The site is adjacent to the Wet Dock Conservation Area and to the Grade II listed Felaw Maltings. This site lies close to Anglo-Saxon remains (IPS 683, IPS 230) and within the Area of Archaeological Importance (IPS 413). Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales.</u>
SAP MM88	-	Appendix 3A Site IP135	<i>This was a new site sheet added at Pre-Submission Modifications stage. Add text to development constraints section of IP135 about water requirements:</i> <u>The site is expected to require improvements to the existing water supply and foul sewerage networks to enable development.</u>
SAP MM89	-	Appendix 3A Site IP136	<i>Add text to development constraints section relating to heritage assets:</i> Access constraints, Air Quality Management Area, it is within an area of archaeological importance and a conservation area, possible contamination, and flood risk, and opposite the Grade I listed and scheduled Wolsey Gate. The site is within Central and Wet Dock Conservation Areas and opposite the grade I listed and scheduled Wolsey Gate. This site lies in an area of international archaeological importance, on the Anglo-Saxon and medieval waterfront of Ipswich and within the Area of Archaeological Importance (Historic Environment Record IPS 413). Ground works could involve surviving sections of 'early' waterfront. There is no objection in principle to development but any permission will require a condition relating to archaeological investigation. Early assessment would be advisable if extensive ground works are proposed. <u>There is a potential for nationally important archaeological remains outside of scheduled areas. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales.</u>
SAP	-	Appendix	<i>Add text to allocation table to refer to sui generis uses and clarify the approach to office (B1a) uses; add text</i>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification									
MM90		3A Site IP140	<p data-bbox="584 272 1547 300"><i>to the development constraints section relating to a pipeline and heritage issues:</i></p> <table border="1" data-bbox="600 339 1816 836"> <thead> <tr> <th data-bbox="607 339 996 408">Use(s)</th> <th data-bbox="996 339 1357 408"></th> <th data-bbox="1357 339 1809 408">Indicative capacity</th> </tr> </thead> <tbody> <tr> <td data-bbox="607 408 996 836">Employment Park</td> <td data-bbox="996 408 1357 520">Business (B1, including offices B1a)</td> <td data-bbox="1357 408 1809 520">10,000sqm</td> </tr> <tr> <td data-bbox="607 408 996 836"></td> <td data-bbox="996 520 1357 836">Other B-Class or similar Sui Generis uses in accordance with DM25 and appropriate employment-generating sui generis uses as defined through policy DM25</td> <td data-bbox="1357 520 1809 836">10,000sqm</td> </tr> </tbody> </table> <p data-bbox="584 879 1861 943"><u>The site is adjacent to the Whitton Conservation Area. Any cumulative impacts on the conservation area with the development of sites IP005 and IP032 will need to be taken into account.</u></p> <p data-bbox="584 986 1872 1198"><u>Roman, Medieval and Anglo-Saxon finds are recorded in the vicinity of the site area (IPS 093). As such any necessary mitigation measures for archaeology should be addressed at an appropriate stage in the planning process. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales</u></p> <p data-bbox="584 1241 1839 1305"><u>A pipeline traverses the site. It could affect the layout or require diversion. National Grid will need to be consulted on any development proposals for the site.</u></p>	Use(s)		Indicative capacity	Employment Park	Business (B1, including offices B1a)	10,000sqm		Other B-Class or similar Sui Generis uses in accordance with DM25 and appropriate employment-generating sui generis uses as defined through policy DM25	10,000sqm
Use(s)		Indicative capacity										
Employment Park	Business (B1, including offices B1a)	10,000sqm										
	Other B-Class or similar Sui Generis uses in accordance with DM25 and appropriate employment-generating sui generis uses as defined through policy DM25	10,000sqm										
SAP	-	Appendix	<i>Provide site sheet for allocation IP141a to reflect the change in status from strategic employment site to</i>									

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification				
MM91		3A – new site sheet, site IP141a	<p><i>employment land allocation through policy SP5:</i></p> <p><u>Site ref: IP141a (UC258) Land at Futura Park, Nacton Road (formerly the Cranes Site)</u></p> <p><u>Site area: 7.1 ha</u></p> <p><u>Allocation Policy SP5</u></p> <table border="1" data-bbox="602 525 1874 831"> <thead> <tr> <th data-bbox="602 525 1382 596">Use(s)</th> <th data-bbox="1382 525 1874 596">Indicative capacity*</th> </tr> </thead> <tbody> <tr> <td data-bbox="602 596 956 831">Primary</td> <td data-bbox="956 596 1874 831">B Class uses (excluding office use B1a) and appropriate employment-generating sui generis uses as defined through <u>policy DM25</u></td> </tr> </tbody> </table> <p><u>Preferred Option 2007</u> <u>100% Employment Use</u></p> <p><u>Current use</u> <u>Vacant employment land (previously allocated as a strategic employment site)</u></p> <p><u>Development constraints / issues</u> <u>TPOs nearby fronting Nacton Road (an application for tree works may be required). Possible contamination. Adjacent to a railway wildlife corridor and buffer.</u> <u>The site is expected to require improvements to the existing water supply and foul sewerage networks to enable development.</u> <u>A transport assessment and travel plan will be required.</u></p>	Use(s)	Indicative capacity*	Primary	B Class uses (excluding office use B1a) and appropriate employment-generating sui generis uses as defined through <u>policy DM25</u>
Use(s)	Indicative capacity*						
Primary	B Class uses (excluding office use B1a) and appropriate employment-generating sui generis uses as defined through <u>policy DM25</u>						
SAP	-	Appendix	<i>Add text to allocation table to refer to sui generis uses:</i>				

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification					
MM92		3A Site IP146	<table border="1"> <thead> <tr> <th>Use(s)</th> <th>Indicative capacity</th> </tr> </thead> <tbody> <tr> <td>Employment (B-Class uses <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u>or similar Sui-Generis uses in accordance with DM25)</td> <td>20,000sqm</td> </tr> </tbody> </table>		Use(s)	Indicative capacity	Employment (B-Class uses <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u> or similar Sui-Generis uses in accordance with DM25)	20,000sqm
Use(s)	Indicative capacity							
Employment (B-Class uses <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u> or similar Sui-Generis uses in accordance with DM25)	20,000sqm							
SAP MM93	-	Appendix 3A Site IP147	<p><i>Add text to allocation table to refer to sui generis uses:</i></p> <table border="1"> <thead> <tr> <th>Use(s)</th> <th>Indicative capacity</th> </tr> </thead> <tbody> <tr> <td>Employment (B-Class uses excluding office uses <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u>, or similar Sui-Generis uses in accordance with DM25)</td> <td>20,000sqm</td> </tr> </tbody> </table>		Use(s)	Indicative capacity	Employment (B-Class uses excluding office uses <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u> , or similar Sui-Generis uses in accordance with DM25)	20,000sqm
Use(s)	Indicative capacity							
Employment (B-Class uses excluding office uses <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u> , or similar Sui-Generis uses in accordance with DM25)	20,000sqm							
SAP MM94	-	Appendix 3A Site IP150c	<p><i>Add text to allocation table to refer to sui generis uses and amenity policy:</i></p> <table border="1"> <thead> <tr> <th>Use(s)</th> <th>Indicative capacity</th> </tr> </thead> <tbody> <tr> <td>Employment</td> <td>B1 uses (offices, research & development, light industrial uses appropriate in a residential area) <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u> (subject to policy</td> </tr> </tbody> </table>		Use(s)	Indicative capacity	Employment	B1 uses (offices, research & development, light industrial uses appropriate in a residential area) <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u> (subject to policy
Use(s)	Indicative capacity							
Employment	B1 uses (offices, research & development, light industrial uses appropriate in a residential area) <u>and appropriate employment-generating sui generis uses as defined through policy DM25</u> (subject to policy							

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification						
			<table border="1" style="width: 100%;"> <tr> <td style="width: 33%;"></td> <td style="width: 33%; text-align: center;"><u>DM26)</u></td> <td style="width: 33%;"></td> </tr> </table>		<u>DM26)</u>				
	<u>DM26)</u>								
SAP MM95	-	Appendix 3A Site IP152	<p><i>Add text to allocation table to refer to sui generis uses and add text to the development constraints section relating to the Area of Outstanding Natural Beauty which overlaps the site:</i></p> <table border="1" style="width: 100%; margin-top: 10px;"> <thead> <tr> <th data-bbox="602 520 996 587">Use(s)</th> <th data-bbox="996 520 1357 587"></th> <th data-bbox="1357 520 1816 587">Indicative capacity</th> </tr> </thead> <tbody> <tr> <td data-bbox="602 587 996 975">Primary</td> <td data-bbox="996 587 1357 975"> B1, B2, B8 excluding B1a offices Other similar Sui Generis uses in accordance with <u>DM25 Appropriate employment-generating sui generis uses as defined through policy DM25</u> </td> <td data-bbox="1357 587 1816 975" style="text-align: center; vertical-align: top;">20,000sqm</td> </tr> </tbody> </table> <p>Possible area of archaeological importance, possible contamination, TPO on site or nearby, Area of Outstanding Natural Beauty on part and noise from the A14. <u>Development will be subject to the preparation of a development brief, which will be expected to address a range of matters including impact on landscape and the purpose of conserving and enhancing the natural beauty of the Area of Outstanding Natural Beauty.</u></p>	Use(s)		Indicative capacity	Primary	B1, B2, B8 excluding B1a offices Other similar Sui Generis uses in accordance with <u>DM25 Appropriate employment-generating sui generis uses as defined through policy DM25</u>	20,000sqm
Use(s)		Indicative capacity							
Primary	B1, B2, B8 excluding B1a offices Other similar Sui Generis uses in accordance with <u>DM25 Appropriate employment-generating sui generis uses as defined through policy DM25</u>	20,000sqm							
SAP MM96	-	Appendix 3A Site IP172	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>Previous permissions have not been implemented (for flats and student accommodation). The site is below the threshold size for allocation but because of its prominent location, it is considered appropriate to plan</p>						

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p>positively for the site. It is within an Air Quality Management Area, an area of archaeological importance and a conservation area, adjacent to listed buildings and there is a scheduled monument nearby. Possible contamination. <u>The site is within the Central Conservation Area, with a nearby scheduled monument, and adjacent listed buildings.</u></p> <p>This part of town lies outside the Late Saxon defences, but was part of the Middle Anglo-Saxon town and is within the Area of Archaeological Importance (IPS 413) and close to a scheduled monument (NHLE 1005989). There is no objection in principle to development but any new permission will require a condition relating to archaeological investigation attached to any planning consent. Archaeological costs have the potential to be relatively high. Early assessment is advised. Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales.</p>
SAP MM97	-	Appendix 3A Site IP188	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>In an area of archaeological importance and a conservation area and adjacent to a listed building. Contamination and flood risk. <u>The site is within the Stoke Conservation Area, with an adjacent listed building. The conservation area is currently on the Heritage at Risk Register.</u></p> <p>This site lies immediately adjacent to an area of Middle Saxon activity and routes leading to the river, and within the Area of Archaeological Importance (IPS413). There is no objection in principle to development but any permission may require a condition relating to archaeological investigation in view of the nature of ground works. <u>Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales.</u></p>
SAP MM98	-	Appendix 3A Site IP214	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>The site is in the Central Conservation Area and an Air Quality Management Area and the within the Town</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p>Centre boundary. This site lies within the historic core of Ipswich and the area of archaeological importance within the Area of Archaeological Importance (IPS413), close to the town defences. Any consent for development will require a planning condition to secure a programme of archaeological work.</p> <p><u>Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales.</u></p>
SAP MM99	-	Appendix 3A Site IP245	<p><i>Add text to development constraints section relating to heritage assets:</i></p> <p>The site is in the Central Conservation Area and next to a listed building, which will need to be taken into account in its design. It lies within the town centre boundary. The site is also in an area of archaeological importance within the Area of Archaeological Importance (IPS413).</p> <p><u>Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work). Archaeological remains may be complex and important and mitigation could involve significant costs and timescales.</u></p>
SAP MM100	-	Appendix 3A Site IP256	<p><i>Add text to development constraints section relating to heritage:</i></p> <p>This site lies in the vicinity of Iron Age and Roman sites. There is no archaeological objection in principle to development but any permission will require a condition relating to archaeological investigation. Whilst it remains an area of archaeological potential, given the impacts of previous landscaping there would be no requirement for an archaeological condition or work on this site on the basis that it looks heavily truncated.</p>
SAP MM101	-	Appendix 3A Site IP258	<p><i>Update the University's title and add text to development constraints section relating to heritage:</i></p> <p>Site ref: IP258 (N/A) Land at <u>the University of Campus Suffolk</u></p> <p>Current use Educational buildings and car parking within the <u>University of Campus Suffolk</u> campus.</p>

Mod. No.	Pg.	Policy / Paragraph	Proposed Main Modification
			<p>Development constraints / issues</p> <p>The University's Arts Block, which is still in use, falls within this site and would need to be replaced elsewhere. Adjacent to an Air Quality Management Area, <u>The site is adjacent to the Central Conservation Area and the Grade II Church of Holy Trinity Church to the south.</u> There are TPO protected trees on and adjacent to the site (an application for Tree Works may be needed), and footpaths. Possible contamination.</p> <p>This large site lies on the edge of the historic core of the town, in the vicinity of Anglo-Saxon and medieval sites (IPS 154). There is no archaeological objection in principle to development but any permission will require a condition relating to archaeological investigation. <u>Detailed early pre-application discussions with Suffolk County Council Archaeological Service would be required to agree the scope of required assessment and to inform design (e.g. to allow for preservation in-situ of deposits or appropriate programmes of work).</u> <u>Archaeological remains may be complex and important and mitigation could involve significant costs and timescales.</u> A desk-based assessment is recommended in the first instance to determine the impact of past land-use, particularly brick making.</p>
SAP MM102	-	Appendix 3A Site IP263	<i>Delete site sheet as site now forms part of IP047</i>

APPENDIX 2A

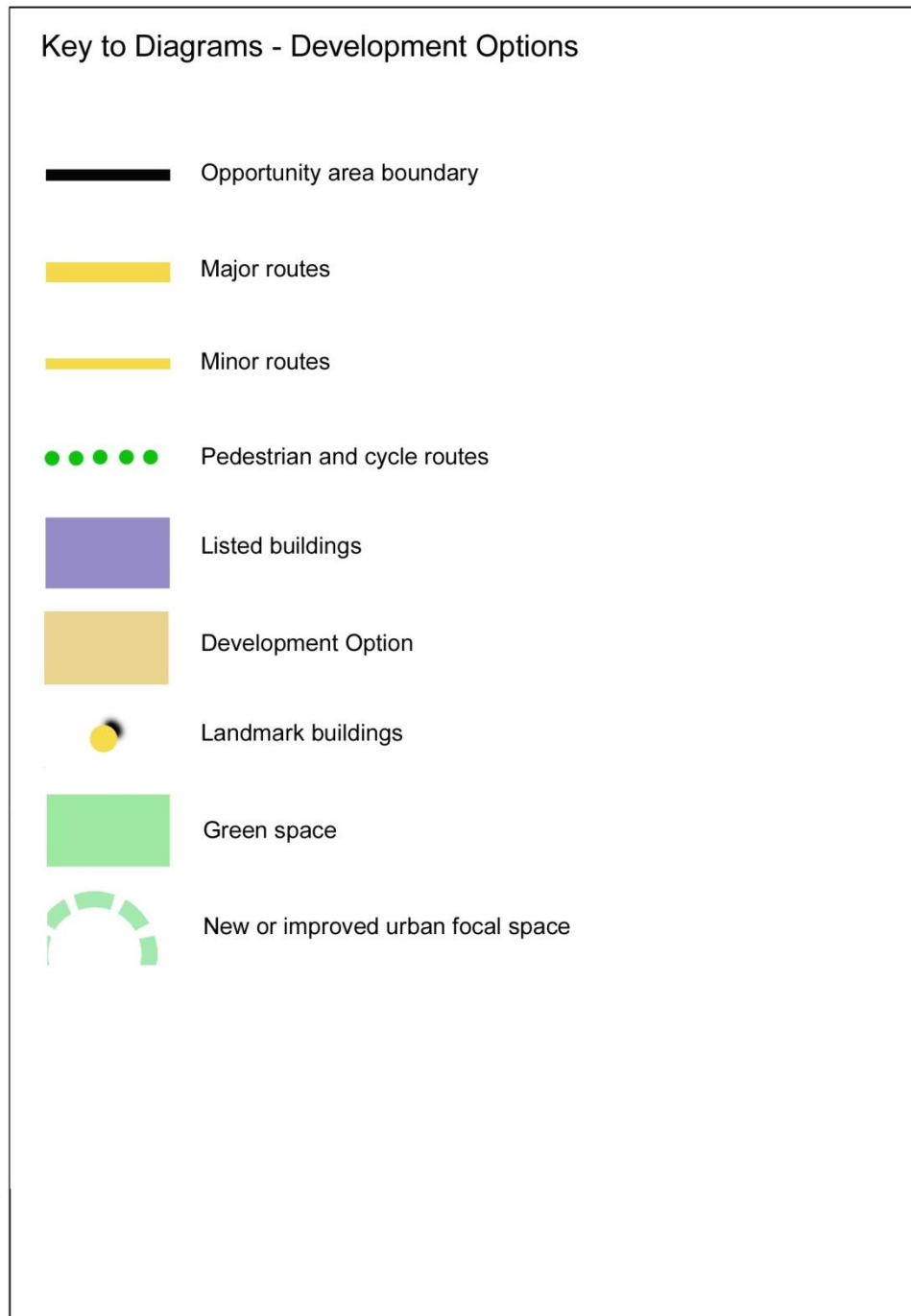
IP-One Opportunity Area Plans

Key to Diagrams – Site Analysis

Key to Diagrams - Site Analysis	
	Opportunity area boundary
	Major routes
	Minor routes
	Pedestrian and cycle routes
	Listed buildings
	Landmark buildings
	Positive frontages
	Frontages having a neutral impact on urban quality
	Frontages detracting from the urban structure
	Green space
	Potential bridging points or existing bridge improvements
	Urban connections to be created or improved
	Scheduled Ancient Monument

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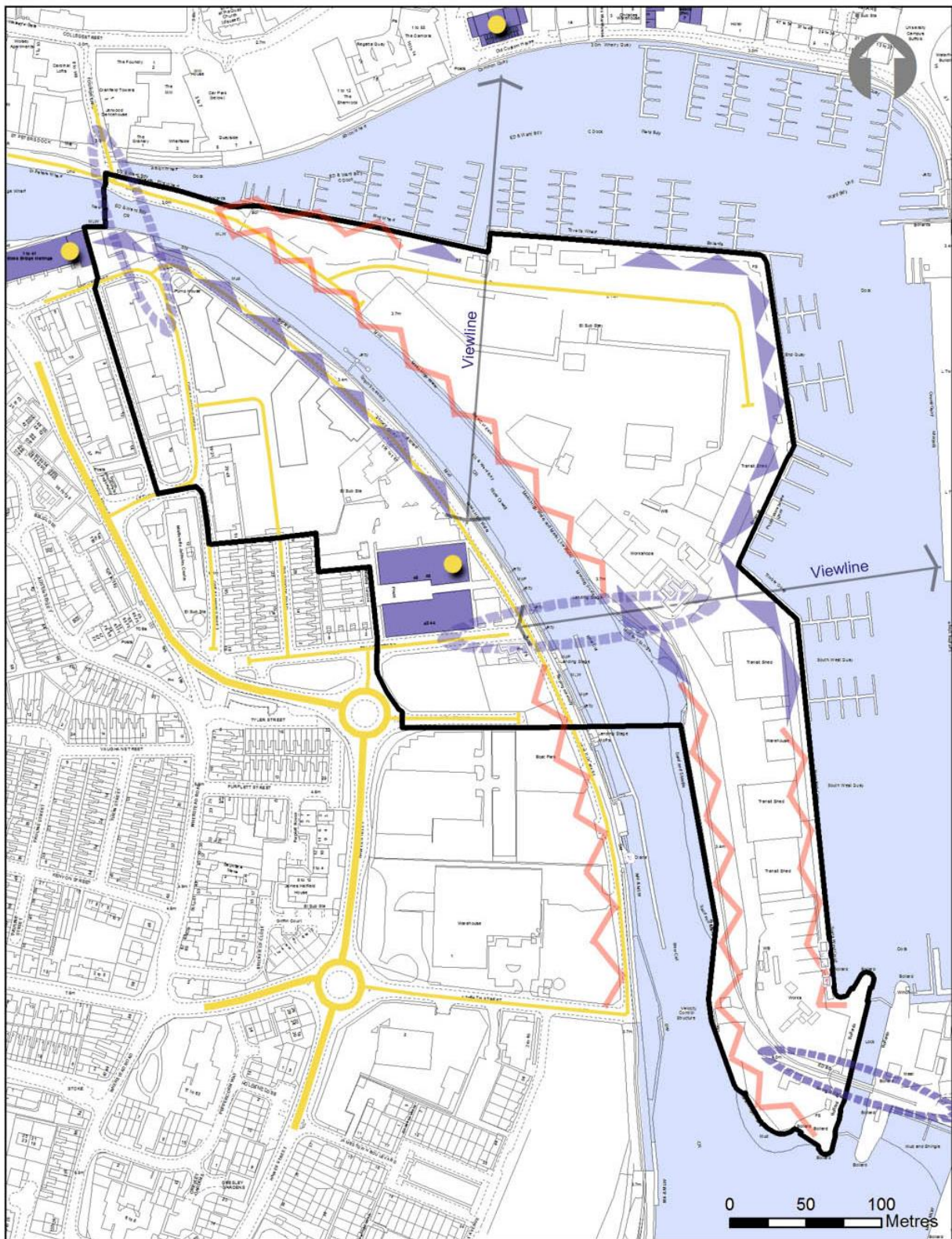
Key to Diagrams – Development Options



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Opportunity Area A – Island Site

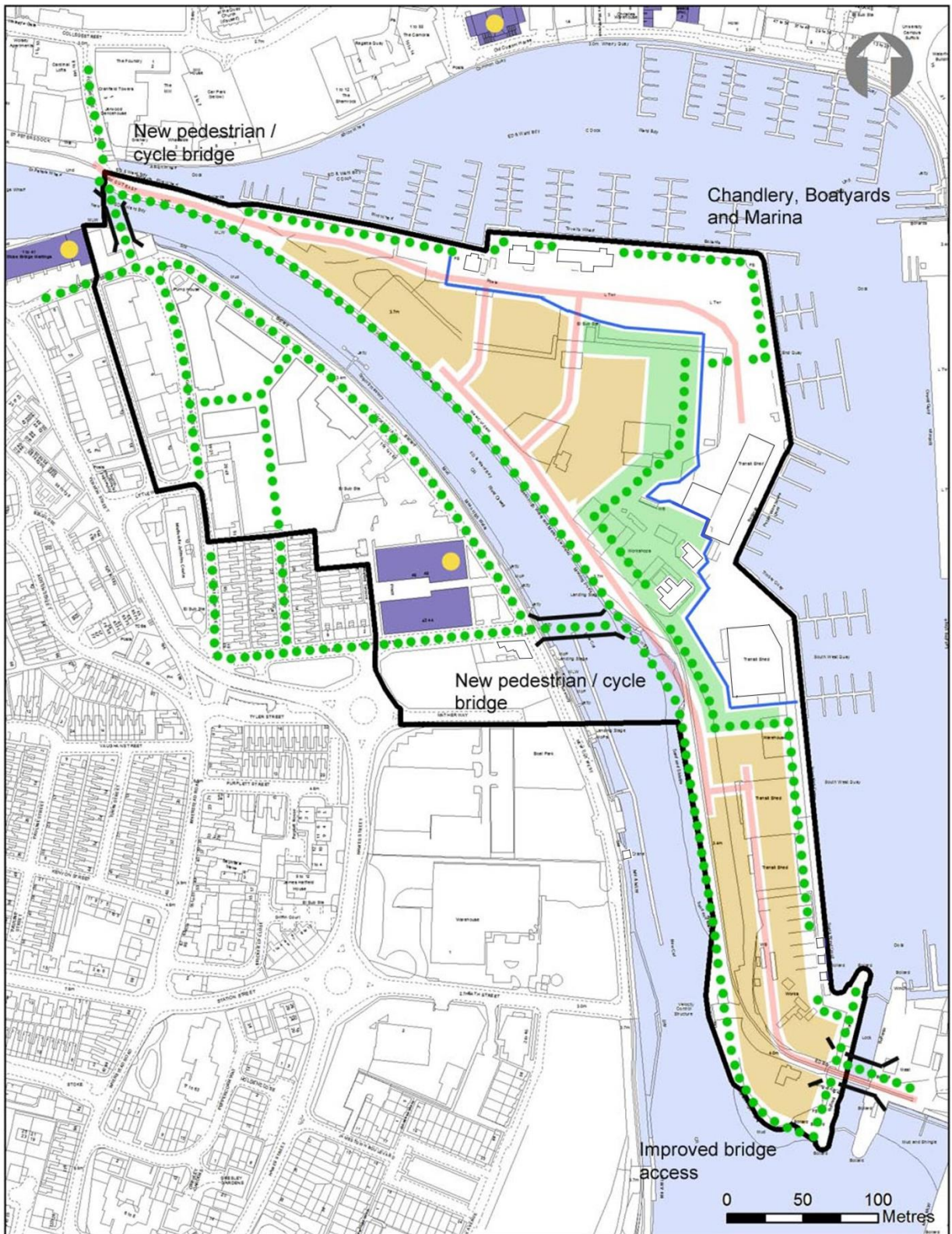
Analysis



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Opportunity Area A – Island Site

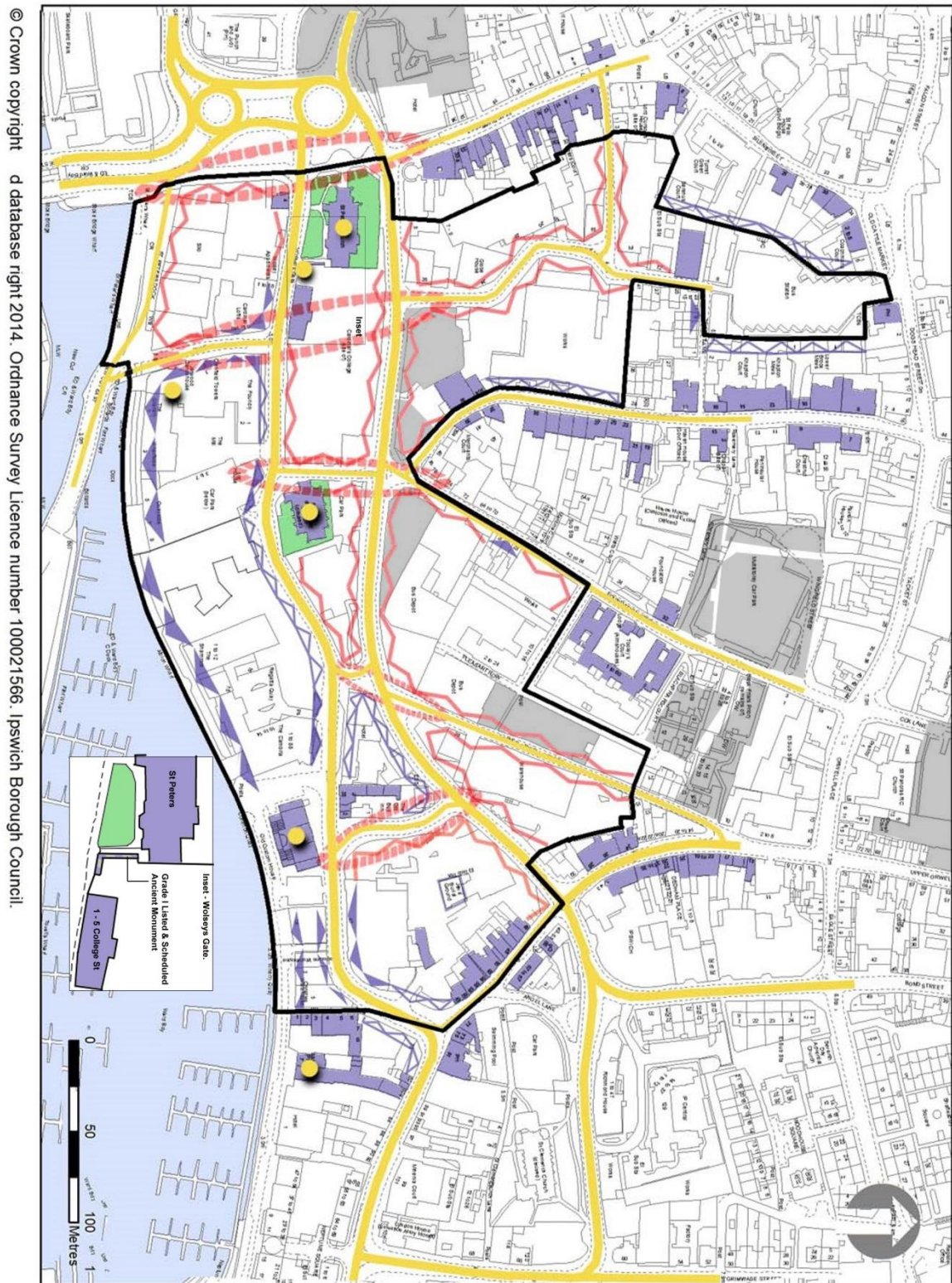
Development Options



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Opportunity Area B – Merchants Quarter

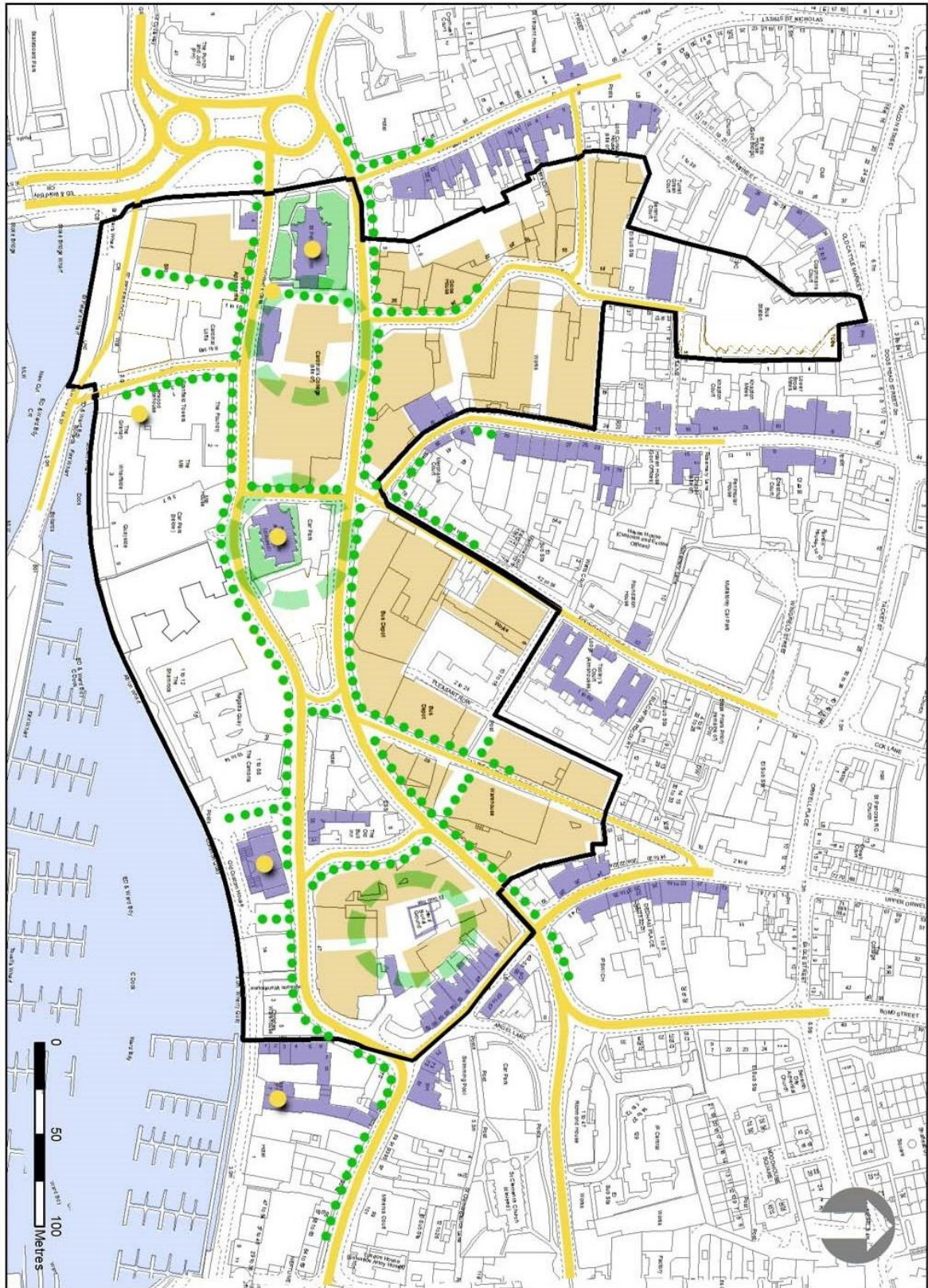
Analysis



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Opportunity Area B – Merchants Quarter

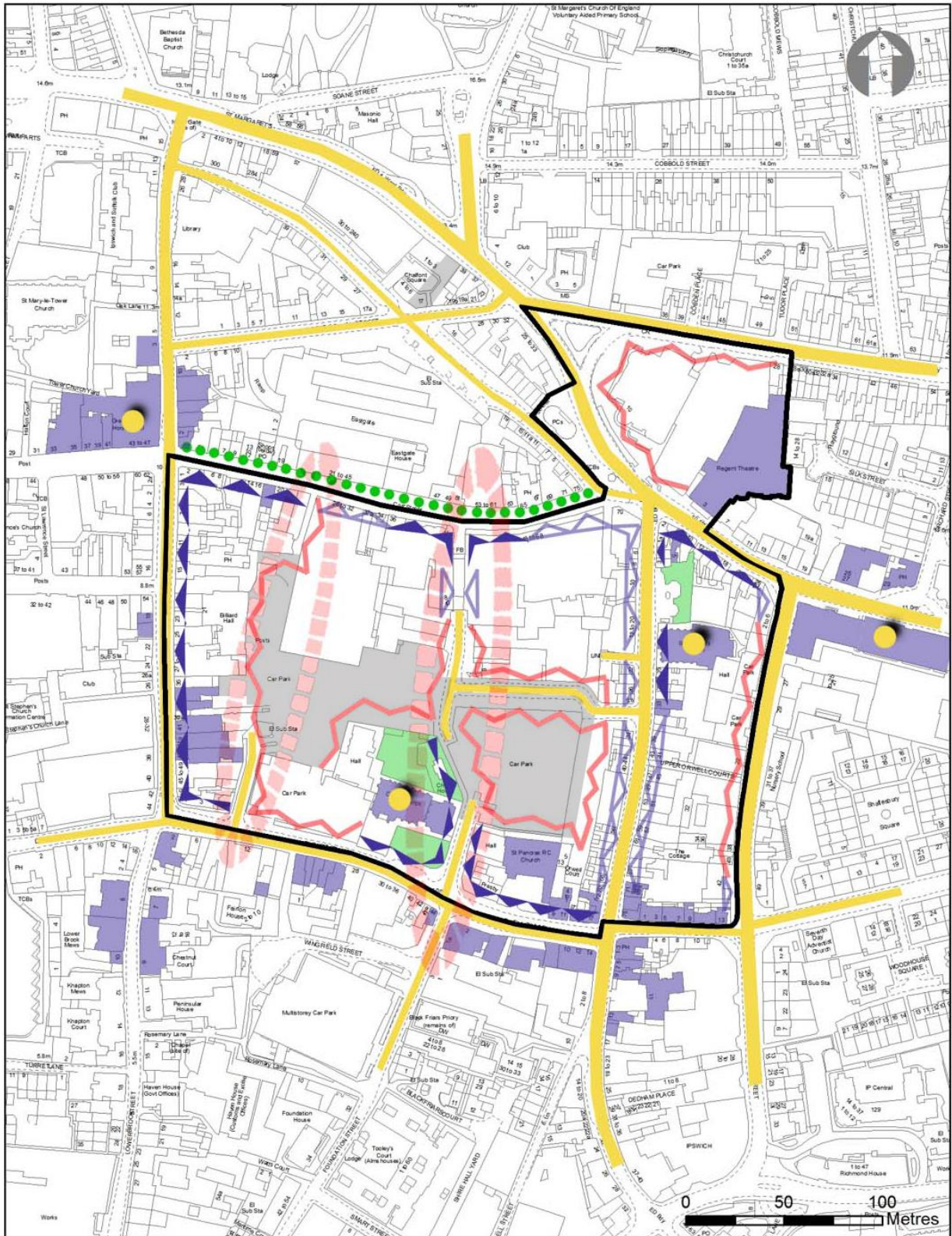
Development Options



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Opportunity Area C – Mint Quarter

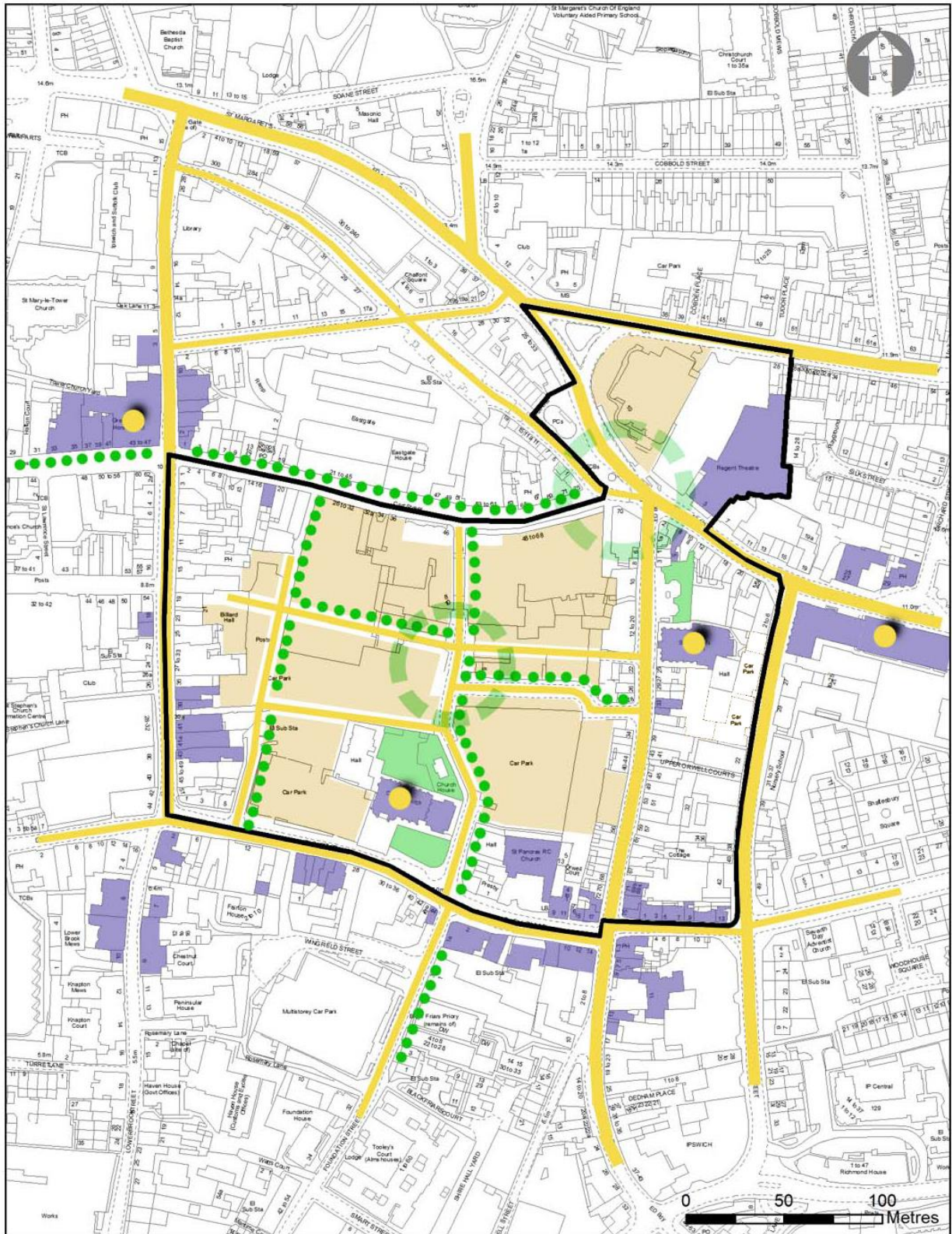
Analysis



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Opportunity Area C – Mint Quarter

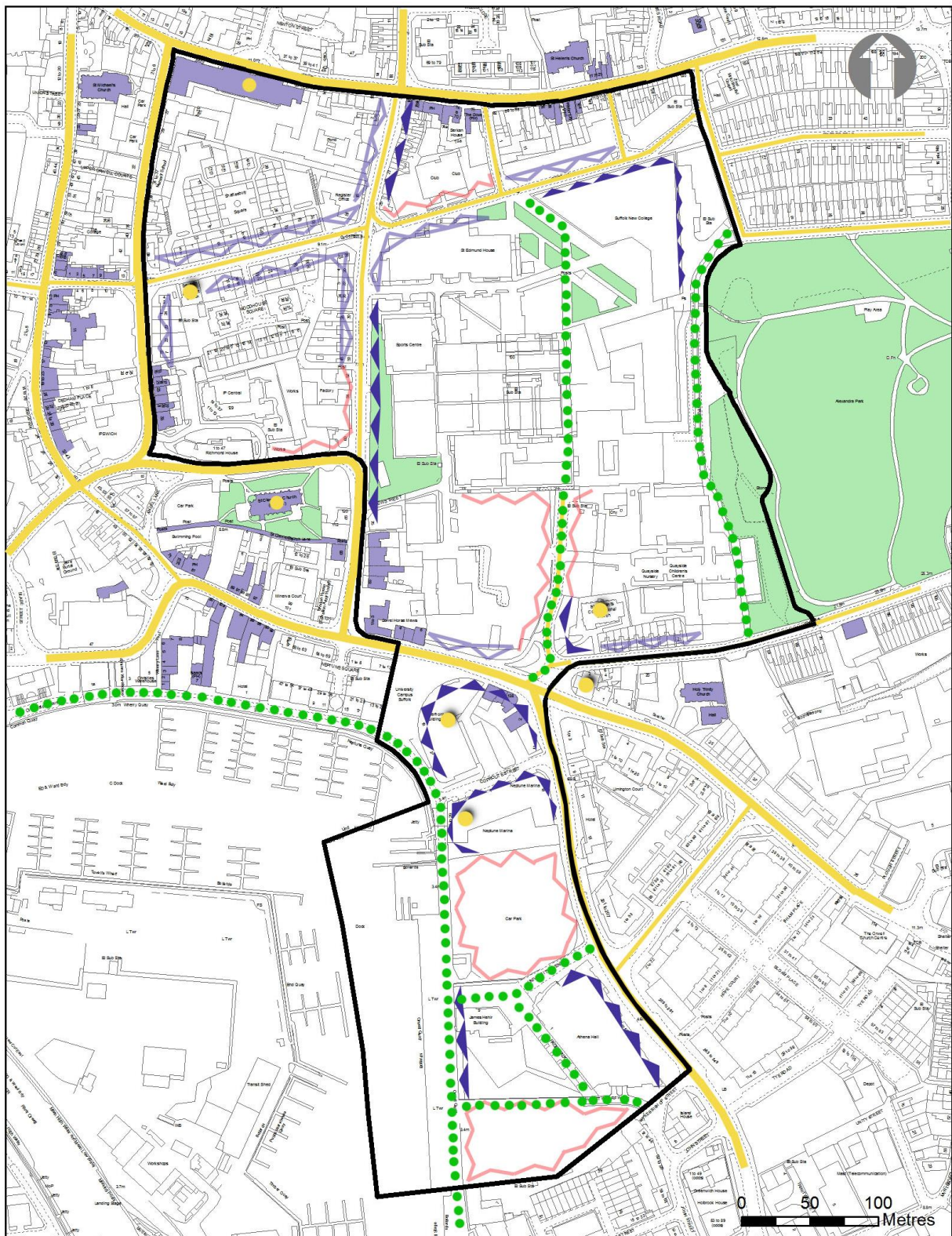
Development Options



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Opportunity Area D – Education Quarter

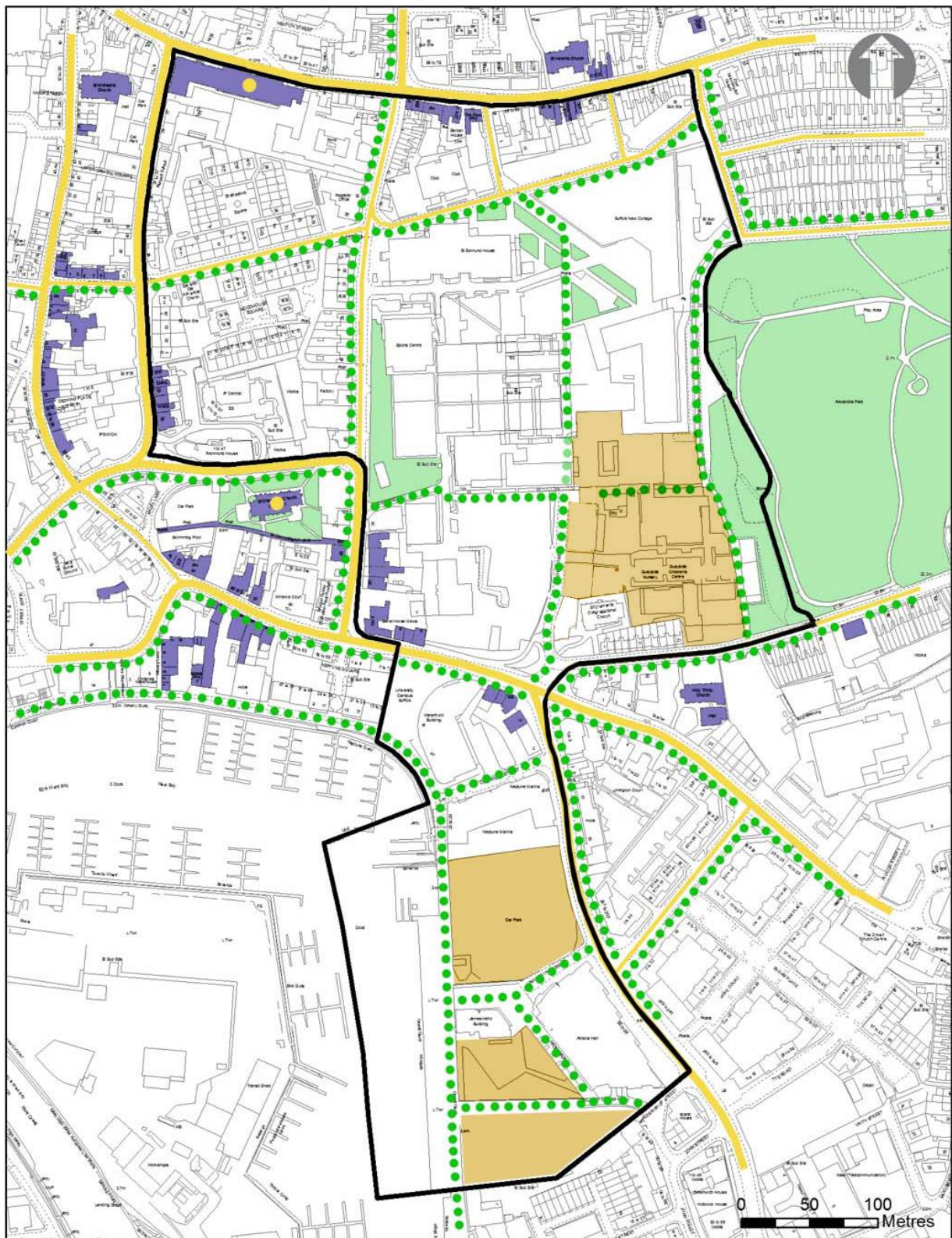
Analysis



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Opportunity Area D – Education Quarter

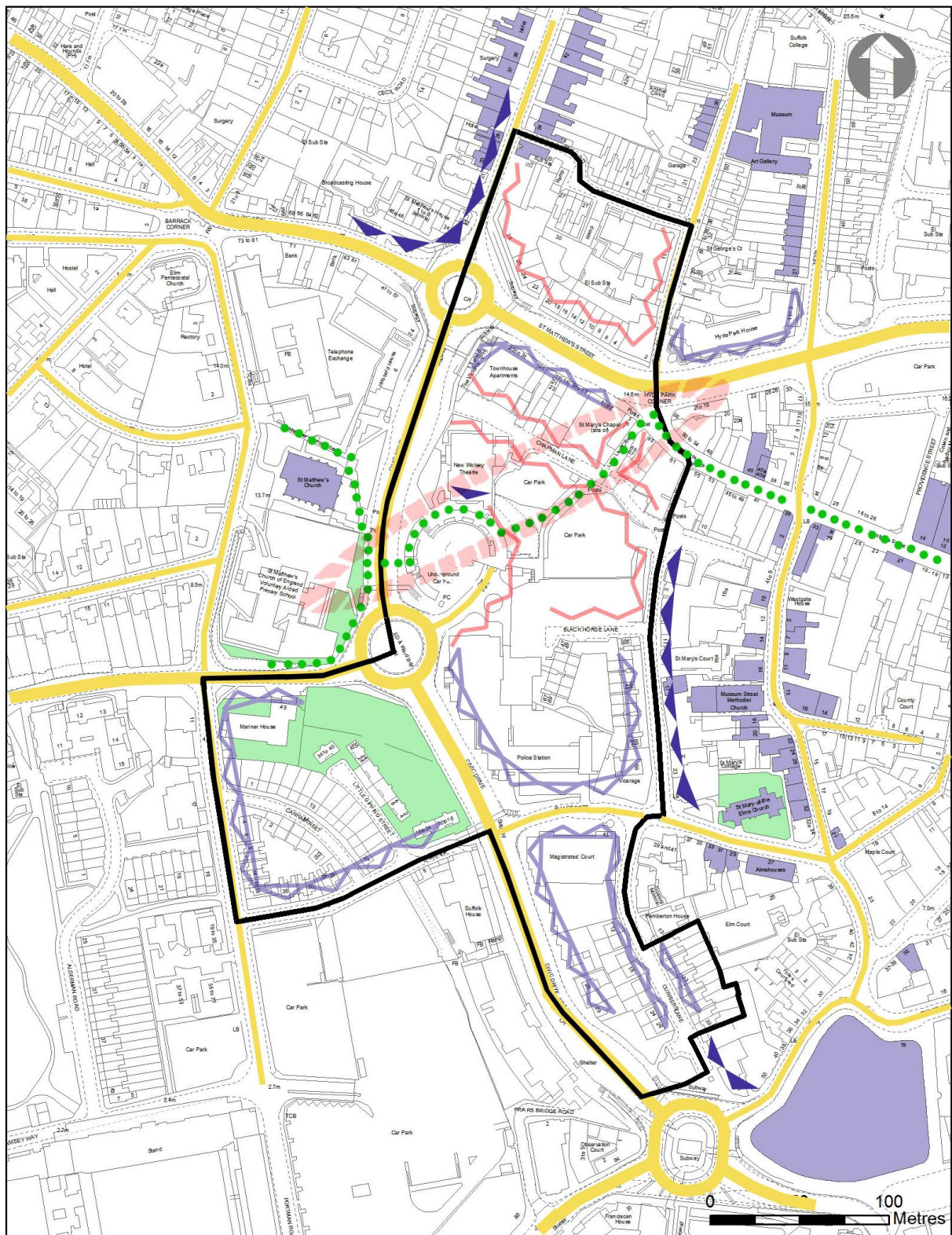
Development Options



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Opportunity Area E – West Gate

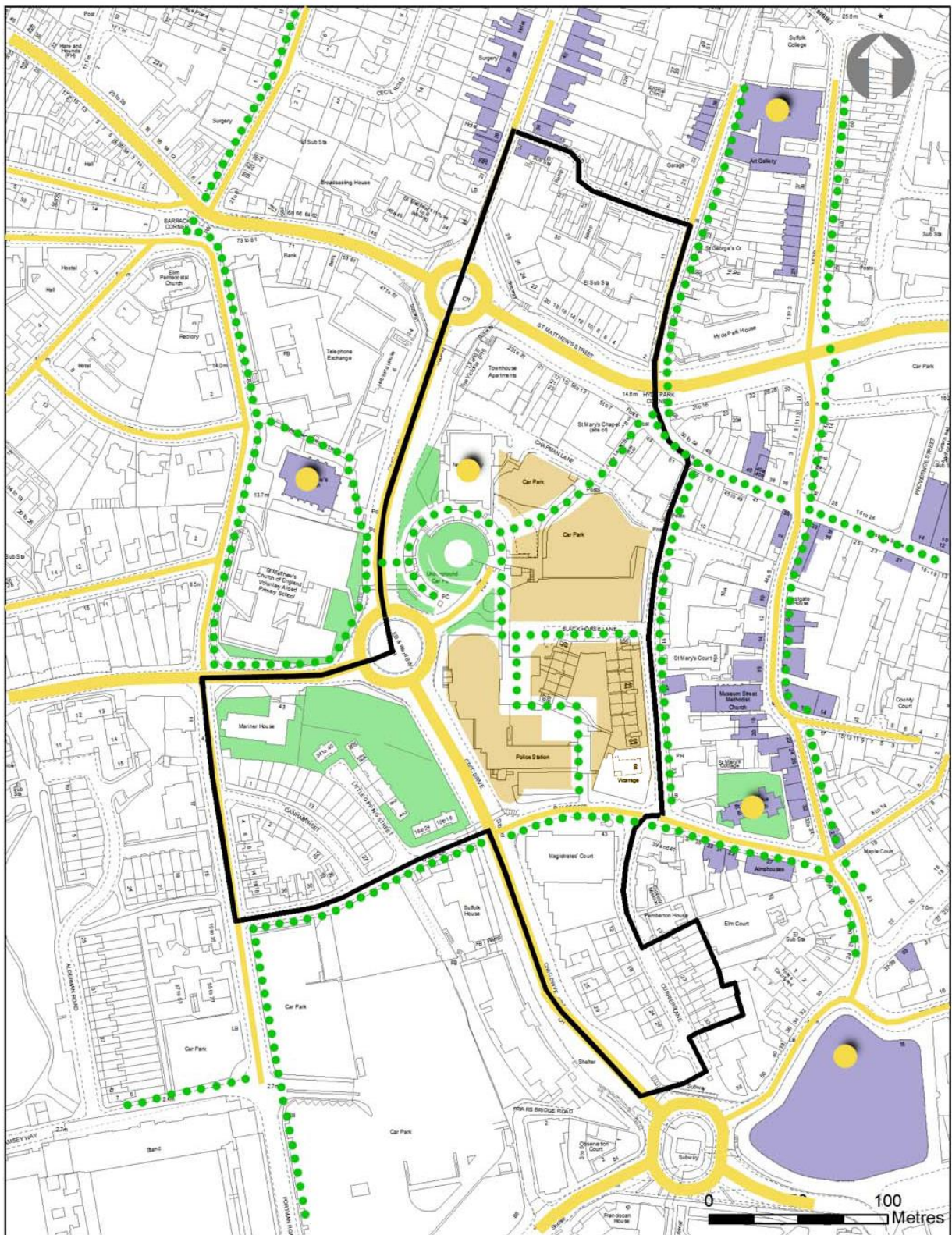
Analysis



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Opportunity Area E – West Gate

Development Options

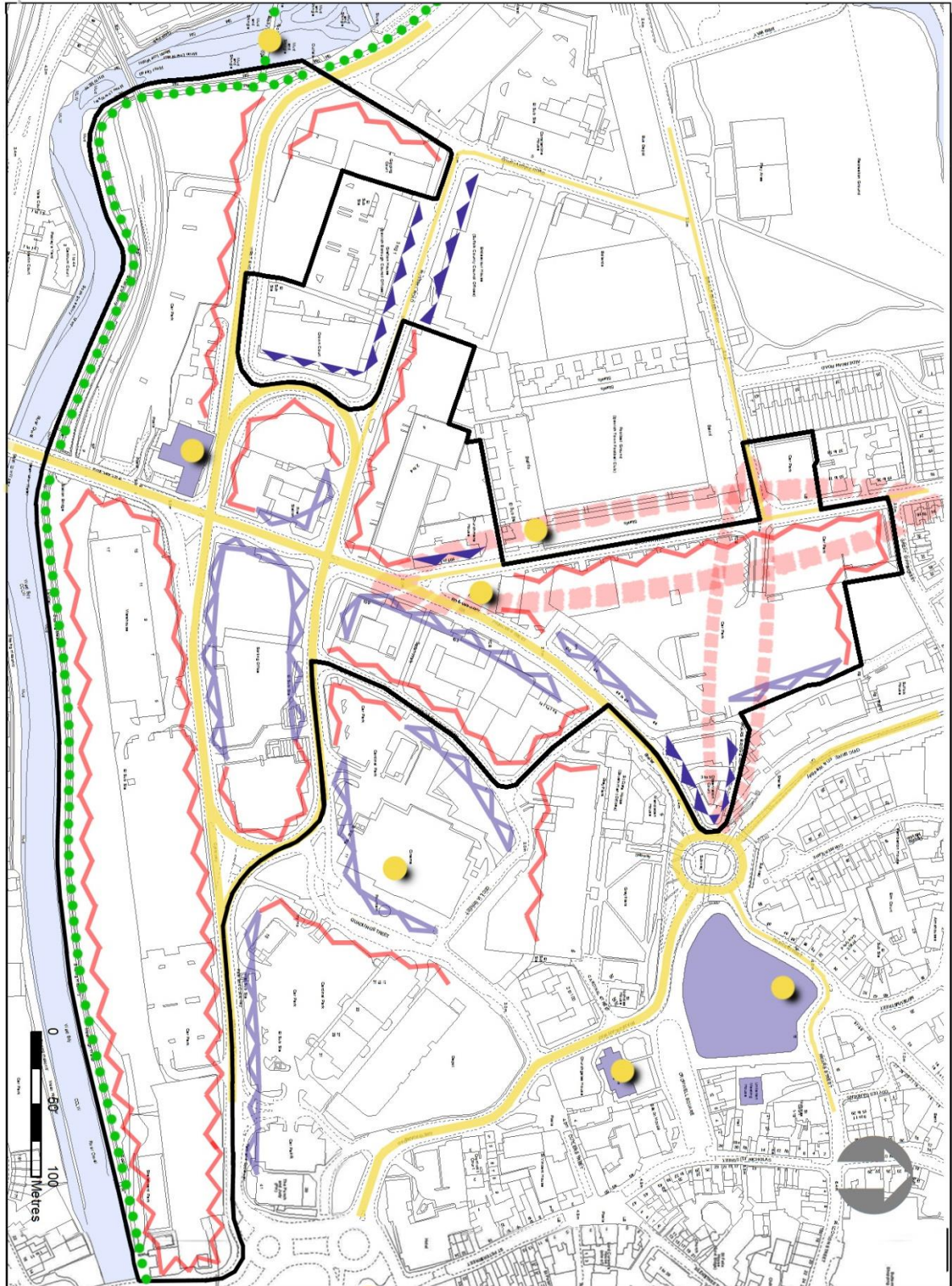


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Opportunity Area F – River and Princes Street Corridor

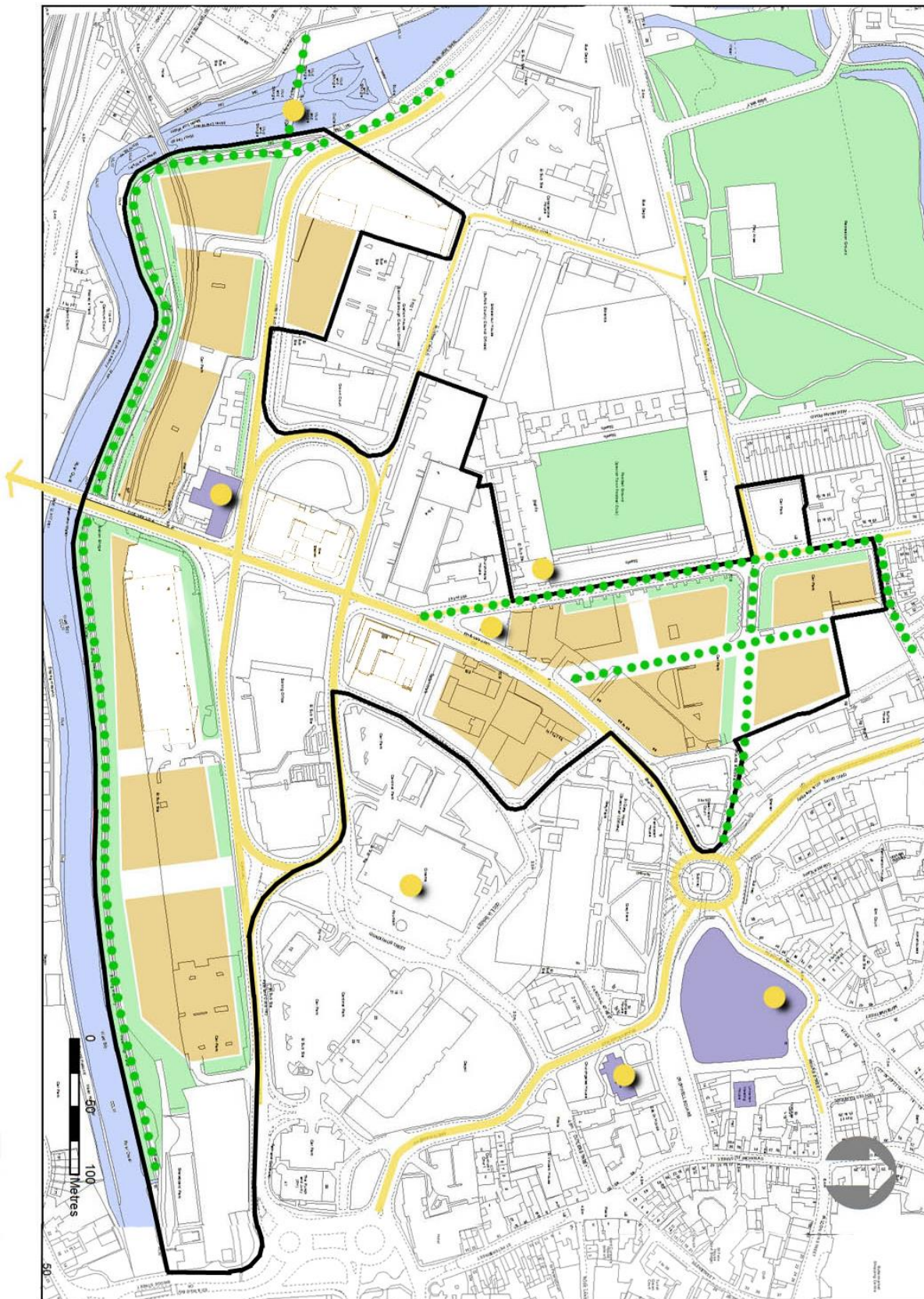
Analysis

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Opportunity Area F – River and Princes Street Corridor

Development Options



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