

Core Strategy Review and Site Allocations & Policies Examination

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Mr R Hobbs
Planning Policy Team Leader

SENT VIA EMAIL

19 April 2016

Dear Mr Hobbs

Ipswich Local Plan Examination (Core Strategy and Policies Development Plan Document Review and Site Allocations and Policies Development Plan Document incorporating the IP-ONE Area Action Plan) - Inspector's Stage 1 Interim Findings

1. Introduction

1.1 Following the completion of the recent hearing sessions, and based on all that I have now read and heard, I write to set out my interim findings on the matters discussed at Stage 1 of the Examination. However, I emphasise that these are not my final conclusions on the plans and that these findings may be subject to change dependent upon, amongst other things, the evidence put forward at Stage 2 of the Examination and the results of Sustainability Appraisal, Habitats Regulations Assessment and consultation on any proposed modifications.

1.2 In summary I conclude that, subject to modifications in respect of a number of matters discussed at the hearings, there is sufficient prospect of the plans being found legally compliant and sound, in relation to the strategic matters so far discussed, to justify progressing to Stage 2 of the Examination. However, this is not a guarantee that the plans will ultimately be found sound.

2. Duty to Co-operate

2.1 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.

2.2 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;

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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 ongoing 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).

- 2.3 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.
- 2.4 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.
- 2.5 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

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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.

- 2.6 There are strongly held objections to the plans in terms of the infrastructure which they identify to be necessary to the delivery of new development, in particular housing. This is a matter which will be discussed in detail at Stage 2 of the Examination. However, and whether or not there is disagreement between Ipswich and Suffolk County councils concerning infrastructure requirements, there is no convincing evidence to indicate that Ipswich Council has not actively engaged with relevant bodies in connection with infrastructure requirements in the preparation of the plans.
- 2.7 As an outcome of the Council's co-operation with other bodies the five local authorities have prepared a Memorandum of Understanding which I gather is shortly to be formally considered for "signing" by each Council. 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.
- 2.8 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.
- 2.9 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 the Council engaged constructively, actively and on an ongoing 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.
3. *Unmet Housing Needs*
- 3.1 The Core Strategy Review, as submitted, indicates that due to the lack of undeveloped land within the Borough a maximum of 9772 additional

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dwellings could be accommodated within Ipswich itself during the plan period. I note representations contend that some sites not allocated in the plans could add to this figure and that there are other sites which have been inappropriately allocated for housing. These are matters to be discussed at Stage 2 of the Examination and it is therefore possible that the 9772 figure could change. However, I have seen no evidence to indicate that Ipswich could appropriately accommodate substantially more dwellings in the plan period than the 9772 figure.

- 3.2 I consider the objectively-assessed need (OAN) for housing in the Borough in detail in section 4 below but, based on the above, Ipswich is not able to accommodate entirely itself the 'starting point' figure of 10435 dwellings indicated by the 2012-based DCLG household projections or the 13550 dwellings contended by the Council to be the OAN for the Borough. It is therefore likely that during the period to 2031 that there will be housing needs in Ipswich which cannot be met in the Borough.
- 3.3 With reference to the preparation of joint or aligned development plan documents (in line with the Memorandum of Understanding), the submitted plans (policies CS6 and CS7) indicate that the Council will work with neighbouring local authorities to address housing need later in the plan period (ie the unmet 3778 dwellings based on the contended OAN of 13550). Representations have suggested that the plans are insufficiently clear about where and when this housing need will be provided 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.
- 3.4 However, the submitted plans (or any other plans for Ipswich alone) cannot make binding requirements on authorities other than Ipswich 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 Policy Area 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.
- 3.5 Amongst other things the Site Allocations plan allocates land for more than 1900 dwellings and for around 49ha of employment development within Ipswich. The Core Strategy allocates additional land for housing at Ipswich Garden Suburb, enabling around 3500 dwellings to come forward at this location during the plan period. Moreover, together the documents would provide up to date development management policies, to secure high quality development supported by the necessary infrastructure, in line with the *National Planning Policy Framework*. They would also allow for the adoption of (and thus full weight to be given to) the, currently

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draft, *Ipswich Garden Suburb Supplementary Planning Document*, which appears to have garnered broad support from developers and the local community. I note there are representations that some of the allocations and development management policies are inappropriate; these matters will be considered at Stage 2 of the Examination and the allocations and/or policies may need to be subject to modification. However the resulting plans, if adopted, would provide much more certainty for both developers and the local community than would exist in their absence. And, whilst it is not impossible that the envisaged development, appropriately designed and supported by the necessary infrastructure, would come forward without the plans in place, it is more likely that it will do so if the plans are adopted.

- 3.6 Of course it would be inappropriate to plan for the housing (and other development) which can be provided in Ipswich itself at the expense of ensuring that arrangements are in place to provide for any unmet housing needs. I have therefore considered whether or not it is likely that agreed arrangements to provide for unmet needs are likely to be secured more quickly if the submitted plans were not to be adopted. As has been contended by some it is of course likely that the absence (in adopted form) of the submitted plans would give Ipswich Borough Council greater incentive to push for work on agreeing the extent of, and proposals to address, unmet housing needs across the Ipswich Policy Area to be finalised as soon as possible. However, Ipswich is only one of at least four authorities which need to agree the way forward and it appears to me that, however quickly Ipswich wishes to proceed, proposals for providing for unmet housing needs are unlikely to be resolved significantly more quickly than in the timescales set out for the production of joint/aligned development plans in the Memorandum of Understanding.
- 3.7 At the hearings it was suggested that the plans could be withdrawn, the cited shortcomings addressed and the plans resubmitted for Examination within a matter of months. However, there is little to suggest that this is a realistic proposition, particularly in terms of fully resolving the fundamental issue of unmet needs.
- 3.8 In essence, 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 any necessary modifications) in terms of encouraging high quality development to come forward within Ipswich itself. At the same time there would be little to lose in terms of getting firm proposals in place to address potential unmet housing needs. Consequently, I conclude that the plans' broad approach to dealing with unmet housing needs is likely to be capable of being found sound. **However, to be effective, the plans should include a policy which states in detail what Ipswich Council will do (and the timescales in which it will do it) to ensure that the extent**

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of unmet housing needs are jointly assessed and that proposals for meeting the needs are put in place as quickly as possible.

4. *Objectively-Assessed Need for Housing*
 - 4.1 The adopted Ipswich Core Strategy (2011-2027) sets out a housing requirement figure of 700 dwellings per year (dpa). The 'starting point' for the consideration of the objectively-assessed need (OAN) for housing for the Review of the Core Strategy is the most recent (2012-based) DCLG Household Projections. The Council has stated that these indicate a requirement for 10435 new dwellings across the 2011-2031 plan period, an average of 522 dpa.
 - 4.2 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 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. On this basis the Council contends that the OAN for the plan period is 13550, or 677 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.
 - 4.3 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 5 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 'starting point' of the 2012-based household projections.
 - 4.4 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 plans' 15% affordable housing requirement (35% for the Ipswich Garden Suburb) would not deliver this figure based on an overall housing requirement figure of 677 dpa. The PPG indicates

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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 hearing the Council stated that it had not formally given this matter consideration.

- 4.5 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 the plans 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/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.
- 4.6 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 the plan period requirement for housing will be below the trend-based 'starting point' figure of 10435 dwellings, contrary to the contention of some representors. 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 cannot, in any event, 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 Policy Area and Ipswich Functional Economic Area.
- 4.7 In summary I conclude that in order to determine an up-to-date and rigorous objectively-assessed need for housing in Ipswich the Council would need to undertake more work, particularly in respect of likely trends in migration from London, the appropriateness of adjustments to reflect up to date evidence on market signals and to help deliver the identified need for affordable housing and to ensure that housing provision in Ipswich is appropriately aligned with likely changes in the number of jobs in the Borough. Nonetheless, for the reasons set out above, I conclude that at the present time the OAN is at least the 'starting point' figure of

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10435 (522 dpa), implied by the most recent DCLG household projections and that it is potentially substantially more.

4.8 However, the plans which are the subject of this Examination can only provide for housing within Ipswich itself and, as detailed in section 3 above, the evidence shows that it is unlikely that even the 'starting point' OAN figure of 10435 dwellings can be provided for in Ipswich during the plan period. Moreover, fundamental to providing for the housing needs which Ipswich itself cannot meet is the work about to commence on preparing joint/aligned development plan(s) for the Ipswich Policy Area. Crucial to this will be the preparation of an up-to-date OAN figure for the Ipswich Housing Market Area and agreed arrangements for the distribution of housing needs which individual authorities cannot themselves meet. Consequently (and having regard to the discussions on this issue at the hearings), I conclude that there would be little point in Ipswich Council undertaking more work to better determine the OAN for Ipswich alone at this stage.

4.9 **In the light of this I recommend that policy CS7 (and elsewhere in the plans as relevant) is modified to reflect the situation I have outlined above and to specifically state that the objectively-assessed need for housing in Ipswich is "at least the 'starting point' of 10435 dwellings indicated by the 2012-based DCLG projections".**

5. Provision for Gypsies and Travellers

5.1 The *2013 Gypsy, Traveller and Travelling Showpeople Accommodation Assessment*, prepared jointly for the Council and its partner authorities, provides robust evidence of the need for additional pitches for gypsies and travellers identified in the supporting text of policy CS11. **However, for the sake of clarity, to be effective and to ensure that accommodation for gypsies and travellers is planned for on the same basis as that for the settled community, a modification is necessary to include the need figure in policy CS11 itself.**

5.2 The Council has indicated that it wishes to delete (by modification) policy SP4 in the light of an allocation now being deemed inappropriate. This particular matter will be discussed at Stage 2 of the Examination but, if the modification is to be made, it appears that **a further modification is likely to be necessary to retain the element of policy SP4 which protects existing sites used by gypsies and travellers.**

6. Five Year Supply of Housing Land

6.1 At the hearings the Council confirmed that it cannot demonstrate a five year supply of deliverable housing land against the submitted plans'

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housing needs figure of 13550 dwellings or even against the 9772 dwellings figure which the Council contends can be accommodated in Ipswich within the plan period as a whole. As detailed in paragraph 3.1 there is, in effect, some challenge to the 9772 figure which will be considered at Stage 2 of the Examination. However, notwithstanding this, it is unlikely that a five year supply will be able to be demonstrated against an OAN of "at least 10435". The Council states that beyond the sites which have been the subject of representation in the Examination (to be considered at Stage 2) it is not aware of any others in the Borough which could feasibly contribute in any significant way to the supply of housing land.

- 6.2 The Council finds itself in difficult and relatively unusual circumstances in this respect, primarily due to the lack of undeveloped land within the Borough boundary. Given this I conclude that the Council's likely inability to be able to demonstrate a five year supply of housing, in the terms indicated above, is unlikely to render the plans unsound. **However, in the interests of clarity and effectiveness, it is necessary for the plans to explicitly reference the matter of five year supply and its implications and to include a policy setting out the approach the Council will take, in the light of the housing supply situation, to determining any application for housing, not on an allocated site, which does happen to come forward. A modification to this effect is therefore required, although it will be necessary to discuss at the Stage 2 Hearings the appropriate basis for the calculation of five year supply.**

7. Employment Land Needs

- 7.1 As explained in section 4 recent trends suggest that the target of creating 12500 new jobs in Ipswich during the plan period is a challenging, albeit not wholly unrealistic, one. However, given that the Framework identifies that it is one of the key roles of planning to contribute towards building a strong responsive and competitive economy, I consider the target to be a soundly based one, albeit that it may need to be subject to review as part of work on the joint/aligned development plan(s) and/or if progress towards achieving the target continues to be slow.
- 7.2 The recently produced *Ipswich and Waveney Economic Areas Employment Land Needs Assessment* identifies that 23.5 ha (net) of additional employment land is likely to be necessary to accommodate the 12500 new jobs in Ipswich, and there is nothing convincing to indicate otherwise. The report notes that a higher "gross" requirement is likely to be necessary for planning purposes, to allow a safety margin and for the replacement of any losses of employment land. However, I question whether this evidence supports the provision of policy CS13 that at least 30ha of land for B1, B2 and B8 will be allocated through the Site Allocations plan in

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addition to safeguarding of 10ha of land (for the same uses) at Futura Park as a Strategic Employment Site – a total nearly double the identified 23.5 ha net requirement. **I therefore request that the Council considers whether or not a modification to this policy is necessary in the light of the Employment Land Needs Assessment;** the matter to be discussed again at the Stage 2 Hearings along with the soundness of the individual employment land allocations.

8. Legal Compliance and Other Matters

8.1 As detailed in section 2 I am satisfied that the Council has satisfactorily discharged the Duty to Co-operate in preparing the plans. Whilst other aspects of legal compliance were discussed at the Stage 1 hearings I cannot reach a conclusion on them until the relevant matters have been discussed in detail at Stage 2. However, at this point I am satisfied that there is not evidence of any fundamental legal compliance failing which could not be addressed by either modifications to the plans or further Sustainability Appraisal work being undertaken if necessary.

8.2 A number of other issues were raised by participants at the hearings which related primarily to matters to be considered in detail at Stage 2 of the Examination. I am therefore not commenting further on these points at this stage.

9. Conclusions

9.1 In the light of the above I conclude that, subject to the modifications detailed above, there is sufficient prospect of the plans being found legally compliant and sound, in relation to the strategic matters so far discussed, to justify progressing to Stage 2 of the Examination. However, I once again emphasise that this is not a guarantee that the plans will ultimately be found sound either in respect of the issues already discussed or those which will be considered at Stage 2.

9.2 Through Annette Feeney, the Programme Officer, I will now put in place arrangements for the Stage 2 hearing sessions to take place as soon as practicable and further details will be provided in due course. In the meantime I request the Council to consider and prepare the draft modifications to the plans I have so far indicated are likely to be necessary.

Yours sincerely

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