

Ipswich Borough Council Local Plan

**Examination of Core Strategy and Policies Development Plan Document
Review and Site Allocations and Policies (Incorporating IP-One Area Action
Plan) Development Plan Document**

**Stage 2 Matters and Questions - Response to Matter 4a Residential and
Sustainable Development Policies and General Development Principles**

June 2016



IPSWICH
BOROUGH COUNCIL

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Matter 4a – Residential and Sustainable Development Policies and General Development Principles

(Policies CS8, CS11, CS12, DM1, DM2, DM3, DM12, DM13, DM14, DM24, DM26, DM27 and DM30 plus issues relating to CS1, CS2, CS9 and SP1 not addressed in other Matters)

4.1 Are the policies (listed above) for residential and sustainable development and general development principles soundly-based? If you contend that they are not how should they be modified? [Note – comments are not sought on policies CS6 or CS7 which were considered at Stage 1 of the Examination.]

Policy CS11

Consistency with national policy

1. National policy for Gypsies and travellers is set out in Planning Policy for Traveller Sites¹. Pages 37 - 41 of the Council's Soundness Self-Assessment Checklist² explain how policy CS11 complies with Planning Policy for Traveller Sites.

Positively Prepared

2. Policy CS11 seeks to meet the full need for gypsy and traveller sites as identified in the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment³ (GTAA), and projects this forward to 2031. The Council is currently working with other local authorities in Suffolk to identify three short stay stopping sites across Suffolk. An initial 'call for sites' consultation was held in autumn 2015⁴ and the authorities are currently considering and assessing potential sites.

Justified

3. The GTAA identifies a need for 18 permanent pitches in Ipswich Borough to 2027 and a need for three short stay stopping sites across Suffolk. The Council has projected the need for permanent pitches forward to 2031 which equates to a requirement for 24 pitches.
4. The Core Strategy Sustainability Appraisal report⁵ explains how alternatives to CS11 were considered as part of the production of the adopted Core Strategy and Policies development plan document. Alternative sites will be considered through the site identification process as part of the joint work with other local authorities in Suffolk.

Effective

5. The policy is being taken forward through joint working across Suffolk. Currently Suffolk local authorities are undertaking work to identify three short stay stopping sites as per the requirement in the GTAA.

¹ CLG, 2015, *Planning Policy for Travellers*, CDL reference NCD22

² Ipswich Borough Council, 2015, *Soundness Self-Assessment Checklist*, CDL reference SUCD23

³ Opinion Research Services, 2013, *Gypsy, Traveller and Travelling Showpeople Assessment*, CDL reference SCD18

⁴ Suffolk Local Authorities, 2015, *Gypsy and Travellers Short Stay Stopping Sites: Call for Sites Consultation Booklet*, CDL reference SCD39

⁵ Arcadis, 2015, *Strategic Environmental Assessment and Sustainability Appraisal – Core Strategy and Policies DPD Review*, CDL reference SUCD09 (section 4.3.3)

6. Following the Stage 1 Local Plan hearings and receipt of the Inspector's Interim Findings, amendments to policy CS11 have been proposed which would see the requirements for pitches previously set out in paragraph 8.114 being incorporated in the policy and the safeguarding of existing sites, previously provided for by SP4, also being incorporated in the policy.
7. The Council also supports the modification proposed by Historic England (representation 5208) whereby 'historic assets' is replaced with 'heritage assets' in clause c (iv).
8. The proposed revisions to CS11 are set out in Appendix 1.
9. The Council therefore concludes that Policy CS11 with these modifications is soundly based.

Policies CS1, DM1 and DM2

Consistency with National Policy

10. National planning policies for climate change are set out principally in paragraphs 93 – 108 of the National Planning Policy Framework (NPPF). Pages 20 – 23 of the Council's Soundness Self-Assessment Checklist⁶ explain how policies CS1, DM1 and DM2 are consistent with the policies of the NPPF.
11. In March 2015 the Government published a Planning Update Ministerial Statement⁷ which had implications for policies relating to the Code for Sustainable Homes. The Soundness Self-Assessment Checklist⁸ explains how the implications of this have been addressed through the Pre-Submission Main Modifications to Policies CS1 and DM1⁹.

Positively Prepared

12. The Council has sought to positively address climate change through seeking standards above 'minimum' requirements (see below) but takes a pragmatic approach by providing for negotiation where there are viability issues.

Justified

13. The Local Plan policies operate within a wider Suffolk aim to tackle climate change. The Suffolk Climate Change Partnership, which consists of Suffolk's local authorities and the Environment Agency and is supported by numerous other business, environmental and community organisations, has a vision to be the county with the greatest reduction in carbon emissions. Suffolk Climate Action Plan 2¹⁰ contains the following objective:

'Development Planning & Transport: Ensuring the position and construction of new buildings and transport policy significantly reduces emissions and supports adaptive responses to future climate change.'

⁶ Ipswich Borough Council, 2015, *Soundness Self-Assessment Checklist*, CDL reference SUCD23

⁷ CLG, 2015, *Written Statement to Parliament – Planning Update March 2015*, CDL reference NCD51

⁸ Ipswich Borough Council, 2015, *Soundness Self-Assessment Checklist*, CDL reference SUCD23

⁹ Ipswich Borough Council, September 2015, *Core Strategy and Policies Development Plan Document Review – Pre-Submission Main Modifications*, CDL reference SUCD02

¹⁰ Suffolk Climate Change Partnership, 2012, *Suffolk Climate Change Action Plan 2*, CDL reference SCD20

Policies DM1 and DM2 provide a practical approach to taking this forward.

14. The Core Strategy Sustainability Appraisal report¹¹ explains how alternatives to CS1, DM1 and DM2 were considered as part of the production of the adopted Core Strategy and Policies development plan document.
15. The requirements of policy DM1 are reflective of the Government's policy as stated in the Written Statement to Parliament – Planning Update¹².
16. In terms of energy use the Ministerial Statement stated that planning authorities may not set conditions for energy use with a requirement above a Code Level 4 equivalent. The Statement was specific in stating that:

‘For the specific issue of energy performance, local planning authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill 2015.’
17. Whilst the Deregulation Act contains a provision, in Section 43, for the part of the Planning and Energy Act which allows planning authorities to set energy efficiency standards which exceed Building Regulations requirements, the amendments to the Planning and Energy Act are yet to be commenced. Until such time the Council is therefore able to set its own energy performance requirements.
18. Therefore, through its Pre-Submission Main Modifications the Council amended its policy to require a 19% improvement on energy efficiency over the 2013 Building Regulations, equivalent to level 4 of the Code for Sustainable Homes.
19. In terms of water use, the Ministerial Statement introduced new ‘optional’ requirements for water use which are now enshrined in the Building Regulations¹³. A minimum standard of 125 litres/person/day is set out in the Building Regulations. The national Planning Practice Guidance (PPG) states that ‘Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day’ (Housing – Optional Technical Standards - paragraph 14). As stated in the supporting text to the amendments to policy DM1, the East Anglian area is identified as an area of ‘severe water stress’ and lowering water demand is identified as one of a range of measures to balance supply and demand in the Anglian Water Resources Management Plan 2015. The Suffolk Climate Action Plan 2 identifies that water stress is likely to increase and identifies water shortages as a future implication of the climate projections.
20. The requirements of policy DM2 are supported by Section 1(a) of the Planning and Energy Act 2008 which allows planning authorities to impose reasonable requirements for a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development and/or a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development.

¹¹ Arcadis, 2015, *Strategic Environmental Assessment and Sustainability Appraisal – Core Strategy and Policies DPD Review*, CDL reference SUCD09 (sections 4.3.2 and 4.4.1)

¹² CLG, 2015, *Written Statement to Parliament – Planning Update*, CDL reference NCD51

¹³ HM Government, 2015, *The Building Regulations 2010: Sanitation, Hot Water Safety and Water Efficiency – Approved Document (2015 Edition)*, CDL reference NCD48

Effective

21. The Council's Authority Monitoring Report¹⁴ shows that in 2014/15 policy DM1 of the adopted Core Strategy was used 82 times and policy DM2 of the adopted Core Strategy was used 29 times, demonstrating that they are regularly applied. Examples of where the adopted policies have been successful in incorporating the requirements include the development of a new medical centre which achieved BREEAM 'Excellent' and the development of 108 dwellings at Bader Close which were required to be constructed to Level 4 of the Code for Sustainable Homes.
22. The Viability Testing for the Ipswich Development Plan report¹⁵ considered the viability implications of Policies DM1 and DM2. The Council's response to this is contained in the Ipswich Borough Council Commentary on Approach and Commissioned Report¹⁶ and concludes that whilst in some cases a flexible approach may be needed, overall the policies are appropriate. It should be noted that whilst the report specifically considered Level 4 of the Code for Sustainable Homes, the energy standards required by revised DM1 are equivalent to Level 4 and the water requirements are similar to Level 4 (the Code for Sustainable Homes would require efficiency of 105 litres/person/day).
23. The Council therefore considers that policies and DM1 and DM2 will be effective in achieving improved standards of construction without harming the viability of development.

Policies CS2, CS9 and DM30

Consistency with National Policy

24. National planning policies for delivering sustainable development are set out principally in paragraphs 18 to 149 of the National Planning Policy Framework (NPPF). Pages 8 to 25 of the Council's Soundness Self-Assessment Checklist¹⁷ explain how policy CS2 is consistent with the policies of the NPPF. Policy DM30 is addressed on page 15.

Positively Prepared

25. The Council has sought to positively address the location of new development in policy CS2 so that people can easily access the jobs, goods and services they want and need, by the most sustainable modes of travel. This enables opportunities for cycling and walking, which are cheap and healthy ways to move around. It also enables facilities to be accessed by as many people as possible benefitting communities and providing opportunities for people to meet. Vehicular emissions and congestion can also be reduced, benefitting the environment, health and the economy.
26. In policy CS9 a focus for development on previously developed land first is outlined, whilst recognising that greenfield land will need to be developed in the Borough, and policy DM30 sets out appropriate densities with the Borough with higher density development in central areas.

¹⁴ Ipswich Borough Council, 2015, *Authority Monitoring Report 2014/15*, CDL reference ICD03a

¹⁵ PBA, 2014, *Viability Testing for the Ipswich Development Plan*, CDL reference LPCD26

¹⁶ Ipswich Borough Council, 2014, *Ipswich Borough Council commentary on approach and commissioned report*, CDL reference LPCD27

¹⁷ Ipswich Borough Council, 2015, *Soundness Self-Assessment Checklist*, CDL reference SUCD23

Justified

27. Ipswich is the county town of Suffolk and a key centre for employment within Suffolk and wider region. With mainline rail links to London and Norwich, Ipswich is well located in particular for the financial and insurance sector. The Ports and Logistics sector is also strong in Ipswich and the surrounding area¹⁸. The public sector is a large employer in Ipswich including Ipswich Hospital, Ipswich Borough Council and Suffolk County Council.
28. Much of this employment is located within the central area of the Borough, which includes the town centre, the waterfront and Ipswich village. The IP-One Area Action Plan identifies brownfield sites for residential use and residential-led mixed use, which will ensure homes are provided within easy walking distance of employers and services.
29. A strategic employment site is identified at Futura Park, Nacton Road, to support economic development and jobs growth and B1 (except office), B2 and B8 employment uses are directed to Futura Park and other employment areas within the Borough.
30. The town centre continues to function as a main retail destination for residents of Ipswich and its hinterland. The population of Ipswich is projected to increase by 20,950 between 2011 and 2031¹⁹, and as a result there will be an increased demand for retail services. It is acknowledged that retail patterns are changing especially with the rise of internet shopping and consumers seeking a shopping experience. However, town centres will continue to function to meet local needs as well as those from further afield, and the amount of retail floorspace in the central shopping area of Ipswich is projected to increase²⁰. Therefore the Local Plan seeks to focus major new retail development in the central shopping area, as well as focusing new office, hotel, cultural and leisure development in the town centre. The waterfront is the key regeneration area of the town and the past two decades have seen this area transform from vacant port land to a thriving destination. A significant number of flats have been developed on the waterfront a high density.
31. Policies CS2 and DM30 set out the Borough's approach to the density of development with high density development promoted in the town centre, Ipswich village and the waterfront, medium density development in the rest of the IP-One area and in and around district centres, and low elsewhere, where it does not compromise heritage assets and the historic character of Ipswich. Locating medium density development within walking distance of the town's district centres ensures a significant proportion of the population can access key goods and services locally. Development is expected to demonstrate principles of very high quality architecture and urban design which enhances the public realm.
32. New residential development and community facilities are also focused in a sustainable urban extension to north Ipswich known as the Ipswich Garden Suburb, which will accommodate approximately 3,500 homes across three neighbourhood areas, together with schools, retail and community facilities including a country park, within two miles of Ipswich town centre.

¹⁸ Nathaniel Lichfield & Partners, 2016, *Ipswich and Waveney Economic Areas Employment Land Needs Assessment*, CDL reference PSCD10

¹⁹ Luton Traded Services, Luton Borough Council, 2013, *Ipswich Housing Market Area Population and Household Projections*, CDL reference ICD08

²⁰ DTZ, 2013, *Ipswich Town Centre Opportunity Areas Report*, CDL reference ICD15 and *Strategic Perspectives, 2010, Retail and Commercial Leisure Study*, CDL reference ICD18

33. Although the Local Plan focuses new housing development particularly in the IP-One area and at the Ipswich Garden Suburb, an element of its housing need will be met beyond the Borough boundary. To address this unmet need, the Council will work with neighbouring authorities to address housing need within the Ipswich housing market area, which includes Babergh, Mid Suffolk and Suffolk Coastal District Councils.

Effective

34. The Council's Authority Monitoring Report shows that in 2014/15²¹ policy DM30 was used 52 times, demonstrating that it is regularly applied. Policy CS2 was used only 8 times and policy CS9 was not used at all. However despite this, of the 470 new homes (net) completed between 1st April 2014 and 31st March 2015, 421 (89.6%) were on previously developed land and 318 (67.7%) were within the IP-One area. 440 of these were new build homes.

35. Examples of densities achieved in Ipswich from developments completed between April 2014 and March 2015 are shown in the table below (also see Authority Monitoring Report 2014/15, p. 25).

Site Address	Within IP-One Area	Net dwellings built during the year	Total number of dwellings on site	Density of whole site (dwellings per hectare)	High, medium or low density
Stoke Quay / Great Whip Street	Yes	250 (includes 59 assisted living units)	307	257	High
St Helen's Street	Yes	55	83	101	High
Phase 1, 2a and 2b, Bramley Hill, off Woodbridge Road	No	26	304	46	Medium
Former Fire Station, Colchester Road	No	41	59	40	Medium
Former Thomas Wolsey School, Old Norwich Road	No	4	48	36	Low
Bader Close	No	5	108	34	Low

36. The Council, therefore, concludes that policies CS2, CS9 and DM30 are soundly based, and development has been delivered in sustainable locations on previously developed land at appropriate densities as detailed in the policies.

²¹ Ipswich Borough Council, 2015, *Authority Monitoring Report 2014/15*, CDL reference ICD03a

Policies CS8, CS12 and DM24

Consistency with National Policy

37. National planning policies for delivering a wide choice of high quality homes are set out principally in paragraphs 47 to 55 of the National Planning Policy Framework (NPPF). Pages 13 to 16 of the Council's Soundness Self-Assessment Checklist²² explain how policies are consistent with the policies of the NPPF.

Positively Prepared

38. The Council has sought to positively address the housing type and tenure in policy CS8 to ensure a balanced mix of housing is provided in the Borough. Policies CS12 and DM24 set out the requirements for affordable housing delivery in the Borough to ensure that a choice of homes is available to meet identified affordable needs in Ipswich.

Justified

39. In addition to Ipswich, the Ipswich housing market area (HMA) also includes the districts of Babergh, Mid Suffolk and Suffolk Coastal. A strategic housing market assessment²³ was published in August 2012 and identified key housing issues for Ipswich, which included:

- Ongoing need for significant affordable housing, particularly smaller homes;
- Ipswich's cheapest housing stock for sale is predominantly small, two and three bedroom terraces often ageing and in poor repair;
- Meeting the housing needs of an ageing population;
- Responding to demographic changes – e.g. growth in student population;
- Decreasing household size;
- Current oversupply of flats and poor perception of flats;
- Matching the jobs to be created with the housing workers will want and need.

40. The affordable housing need is primarily for small homes including smaller family homes, whilst for market housing provision will need to match aspirations for job creation and improved qualification levels.

41. Policies CS8, CS12 and DM24 positively address these issues in supporting a mix of dwelling types to be provided in order to achieve mixed and sustainable communities. Exceptions to this are considered where a different approach is demonstrated to better meet housing needs or where it can ensure housing delivery in a timely manner.

42. The Council also supports self-build, custom build and co-housing developments in appropriate locations whilst setting out requirements to meet affordable housing, in particular affordable and social rent.

43. Policy CS12 sets out the requirement for new development at the Ipswich Garden Suburb to provide for at least 35% on-site affordable housing by total floorspace and new developments of 15 dwellings or more (or on sites of 0.5 hectares or more) in the remainder of the Borough to provide for at least 15% on-site affordable housing by total floorspace. At least 80% of affordable housing provision shall consist of affordable

²² Ipswich Borough Council, 2015, *Soundness Self-Assessment Checklist*, CDL reference SUCD23

²³ Babergh, Mid-Suffolk and Suffolk Coastal District Councils, 2012, *Ipswich Housing Market Area Strategic Housing Market Assessment*, CDL reference SCD12

rented homes or homes for social rent. These requirements have been supported by viability testing²⁴.

Effective

44. The Council's Authority Monitoring Report shows that in 2014/15²⁵, of the 470 new homes (net) completed between 1st April 2014 and 31st March 2015, 202 (43%) were affordable. A significant number of these were completed in the development at Stoke Quay / Great Whip Street. Policy CS8 enables different approaches to be delivered if demonstrated to better meet housing needs, and developments at both Stoke Quay / Great Whip Street and at Bader Close have included greater affordable housing than the requirement in policy CS12. This has ensured that both housing and affordable housing delivery has been effective in the Borough.

Policies DM3, DM12, DM13, DM14, DM26 and DM27

Consistency with National Policy

45. These policies address:
- DM3 Outdoor amenity space
 - DM12 House extensions and ancillary buildings
 - DM13 Infill and backland development
 - DM14 Subdivision of houses
 - DM26 Amenity and
 - DM27 Non-residential uses in residential areas.
46. These policies address the need to ensure that residential areas retain their character, appearance and liveability.
47. Policies DM3 and DM12-14 address the design of different types of housing development. The NPPF identifies securing high quality design as a core planning principle (paragraph 17) and a key aspect of sustainable development (paragraph 56). Paragraph 53 also highlights the inappropriate development of gardens. The policies comply with the NPPF.
48. Policies DM26-DM27 address amenity and pollution. The NPPF identifies securing a 'good standard of amenity for all existing and future occupants of land and buildings' (paragraph 17) as a core planning principle. Paragraphs 109, 110 and 120 of the NPPF address pollution. Policies DM26 and DM27 ensure that these matters are appropriately taken into account through the development management process.

Positively Prepared

49. The policies together set out a positive approach to ensuring that development is well designed and protects or enhances the character, appearance and amenity of residential neighbourhoods. They build in flexibility where appropriate, for example in relation to garden sizes in DM3, and set out clear criteria for the consideration of planning applications.

²⁴ Ipswich Borough Council, 2014, *Ipswich Whole Plan Viability Testing – Ipswich Borough Council Commentary*, CDL reference LPCD27 and Peter Brett Associates, 2014, *Viability Testing for the Ipswich Development Plan*, CDL reference LPCD26

²⁵ Ipswich Borough Council, 2015, *Authority Monitoring Report 2014/15*, CDL reference ICD03a

Justified

50. All of the policies are carried forward from the adopted Ipswich Core Strategy 2011.
51. They were included because the types of development that they address are commonplace in Ipswich and thus require some more detailed policy guidance to ensure that such developments do not adversely affect the character and appearance of the existing area or the amenities of neighbouring residents. DM27 also protects the supply of dwellings, which is considered important to help meet the Borough's housing needs.
52. Policy DM3 was introduced to the adopted plan because the Council considered outdoor amenity space as a key component of creating more sustainable living environments. It also links through to policies for sustainable drainage by providing space for soakaways. To support the policy, checks were made through a design exercise²⁶ which demonstrated that the garden size requirements are compatible with the plan's density requirements (policy DM30).
53. Alternatives considered through the SA process are explained in sections 4.4.1, 4.4.3 and 4.4.7 of the submitted Core Strategy Sustainability Appraisal Report²⁷.

Effective

54. The Council's Authority Monitoring Report²⁸ shows that in 2014/15 all of the above policies of the adopted Core Strategy were used. Policy DM3 was used 56 times; DM12 362 times; DM13 129 times and DM14 9 times. Policies DM26 and DM27 were used 511 and 13 times respectively. This demonstrates that they are regularly applied.
55. The Council, therefore, concludes that the development management policies considered above are soundly based.

Policy SP1 The Protection of Allocated Sites

Consistency with National Policy

56. Policy SP1 seeks to safeguard sites allocated for specific uses through the Ipswich Local Plan for the use identified. In doing so it complies with the NPPF, which identifies as a core planning principle (paragraph 17) 'allocating sufficient land which is suitable for development in their area' and also as a key requirement for Local Plans, allocating 'sites to promote development and flexible use of land' (paragraph 157).

Positively Prepared

57. The Council has sought to positively address the Borough's development needs through the Local Plan site allocations. Policy SP1 ensures that the allocations would not be lost to alternative uses, unless it can be demonstrated that the allocated use no longer meets all the criteria of being needed, viable and deliverable.

²⁶ Essex Design Initiative, 2010, *Ipswich Urban Design Policies Viability Study*, CDL reference ICD59

²⁷ Arcadis, 2015, *Strategic Environmental Assessment and Sustainability Appraisal – Core Strategy and Policies DPD Review*, CDL reference SUCD09 (sections 4.4.1, 4.4.3 and 4.4.7)

²⁸ IBC, 2015, *Authority Monitoring Report 11 2014-15*, CDL reference ICD03a

Justified

58. The NPPF is clear in requiring the Local Plan to allocate sufficient land to meet the housing, business and other development needs of the area. The Borough's development needs are identified through policies such as CS7 (for housing), CS13 (for employment development) and CS14 (for retail development). Site allocations made through the Core Strategy Review and the Site Allocations plan will be important in helping to meet those needs. Therefore, policy SP1 will help to ensure that the development needs are capable of being met. The policy does allow some flexibility in recognition of the fact that needs and viability can change over a plan period.

Effective

59. As the policy is not yet in place, it is not possible to look back at its usage to demonstrate its effectiveness. However, the Council considers that the policy will be deliverable and perform an important role in both safeguarding sites and providing for changing circumstances where necessary.

60. The Council, therefore, concludes that policy SP1 is soundly based.

Appendix 1 Revised Policy CS11

POLICY CS11 – GYPSY AND TRAVELLER ACCOMMODATION

- 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 2031/2027. 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.~~
- 8.112 Work is being undertaken with neighbouring authorities, the County Council and the Gypsy community to identify possible sites to meet the need to provide additional pitches in the Ipswich Policy Area. The policy will provide the context for the ongoing provision of pitches over the plan period.

POLICY CS11: GYPSY AND TRAVELLER ACCOMMODATION

Provision will be found within the Ipswich Policy Area for additional permanent pitches to meet the need for 24 permanent pitches to 2031, as identified through the Gypsy and Travellers Accommodation Assessment and projected forward to 2031.

Applications for the provision of permanent pitches will be considered against the following criteria:

- 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.**

Sites for additional Gypsy and Traveller pitches will be assessed against the following criteria.

- a. **The site should be located:**
 - i. **where it would be well served by the road network; and**
 - ii. **preferably, within 1km of basic services including the public transport network.**

- b. **The site should be:**
 - 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.
- c. The site should not have a significant adverse impact on:
- 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. ~~histori~~heritage assets including their setting; and
 - v. the physical and social infrastructure of local settlements.

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.

The Council will work with Suffolk County Council and neighbouring authorities to develop a South Suffolk transit (short stay) site between Ipswich and Felixstowe.

The needs of travelling showpeople will be kept under review. Applications for new sites will be assessed against criteria a. to c. above.

Sites currently used by Gypsies and Travellers are identified on the policies map and are protected for that use.

- 8.113 Sites for Gypsies and Travellers could be privately or publicly provided - the criteria will apply equally to both, as they are about creating safe and healthy living conditions and providing sites within a reasonable distance of basic services such as schooling. Basic services include primary school, secondary school, convenience store, health centre or GP surgery, children's play facility, pharmacy and meeting place.
- 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 Gypsy, and Traveller and Travelling Showpeople Accommodation Assessment (GTAA) 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 assessment, it is possible that around a further 6 pitches would be needed between 2027 and 2031.
- 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. The GTAA identifies a need for three short stay sites across the study area.

- 8.116 Just as affordable housing is delivered through the planning system in larger housing developments where there is a local need, so the needs of Gypsies and Travellers should be met in a more systematic manner.
- 8.117 The Council will work with the Gypsy and Traveller communities to ascertain need in particular locations, prior to the identification or allocation of sites.
- 8.118 The existing site at West Meadows is a large one containing 41 pitches. Whilst the Council would not limit the size of new sites, anecdotal evidence of preferences in the Gypsy and Traveller community locally is for smaller sites to provide pitches for family groups.
- 8.119 This policy supports plan objectives 3 and 10.