

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 6 Employment Policies and Allocations

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Matter 6 – Employment Policies and Allocations (Policies CS13, DM25 and SP5)

6.1 In the light of the need for 23.5ha (net) of employment land in Ipswich (identified in the Ipswich and Waveney Economic Areas Employment Land Needs Assessment (2016)) is the provision of policy CS13 that at least 30ha of land in addition to 10ha at Futura Park will be allocated for B1, B2 and B8 uses soundly-based?

[Note – comments are not sought on the 12,500 new jobs target which was discussed at Stage 1 of the Examination.]

Consistency with national policy

1. National planning policy for economic growth is set out in the National Planning Policy Framework (NPPF)¹ paragraphs 18 to 22. Pages 8-9 of the Council's Soundness Self-Assessment Checklist² explain how policies CS2, CS13, SP5 and DM25 address the requirements of national policy to support sustainable economic growth.

Positively Prepared

2. The Strategic policies CS2 and CS13 set out the spatial strategy for B class uses and the jobs target that the plans seek to meet (approximately 12,500 jobs in the Borough from 2011 to 2031), which was discussed at Stage 1 of the Examination. These reflect the Council's vision set out paragraph 6.7 of the Core Strategy Review, which identifies more people living and working in Ipswich town centre by 2031 (point a.) combined with new employment development at sites around the Borough (point f.). This ties in also with the Ipswich Vision³ for a revived town centre, which sees office development focused into a 'Franciscan Quarter' based around Princes Street. CS13 sets out the amount of employment land to be allocated and SP5 allocates specific sites for B class uses or mixed use including B class uses. Policy DM25 protects existing employment land and premises for B class uses and recognises the importance of Ipswich Port.
3. The policies together represent a positive approach to meeting the qualitative and quantitative needs for economic development in Ipswich and helping to deliver the New Anglia Local Enterprise Partnership's (NALEP) ambition to 'transform the economy of Norfolk and Suffolk and establish the New Anglia area as a centre of global business excellence', by harnessing sector strengths and natural assets to deliver 95,000 more jobs⁴.
4. Fundamental to a positive approach is the allocation of sufficient land for employment development. In allocating land for 'at least 30ha' through policy CS13, against a net requirement for 23.5ha, the plan provides for choice in land available for development. The approach in policy CS13 therefore represents positive planning in relation to the need for employment land. This is explained further in the sections below.

¹ CLG, 2012, *National Planning Policy Framework*, CDL reference NCD18

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

³ Various, 2015, *Turning our Town Around*, CDL reference ICD79

⁴ NALEP, 2014, *New Anglia Strategic Economic Plan*, CDL reference SCD02

Justified

5. Policy CS13 clause a. states that at least 30ha of land will be allocated for employment development in Use Classes B1, B2 and B8⁵. The allocation figure remains the same as in the adopted Core Strategy, which was based on the Employment Land Review published in 2009⁶. The Employment Land Review identified a need for 6 - 13ha of land for office uses and 9 - 38ha for industrial uses within the Borough.
6. In reviewing the figure for the Core Strategy Review, a range of macroeconomic and local indicators were considered as set out in the Employment Topic Paper⁷. These included land availability and take up, employment forecasts and site capacities. Thus CS13 also responds to:
 - the estimated jobs capacity of sites within the Borough, in relation to the jobs target;
 - the need to provide a range and choice of locations and sites to support growth in different economic sectors; and
 - the quality and deliverability of sites.
7. Clause d. of policy CS13 also safeguards 10ha of land at Futura Park as a strategic employment site. The policy amends the site area down from 16.7ha identified through the adopted Core Strategy, as part of the site has already been developed for retail uses permitted as enabling development to deliver the strategic employment element. The strategic employment site allocation is expected to function as Phase II of the Ransomes Europark development and help to consolidate an important employment corridor along Nacton Road. At 10ha, it is the largest employment site within Ipswich Borough and there are no alternative sites available which match both its size and locational advantages. Development of the remaining 10ha is already underway. Planning permission reference 15/00790/FUL is under construction as a motor vehicle dealership including showroom, offices and workshops. These uses are not all B class uses, although they are employment generating, and have in some cases moved from elsewhere in Ipswich. This further highlights the need to ensure that more than 23.5ha of land (the net requirement) is provided to enable such moves to take place without restricting the ability of new uses to develop.
8. A more up to date Employment Land Needs Assessment ('ELNA') for Ipswich and Waveney Economic Areas was published in March 2016⁸. The key findings for the Ipswich Economic Area are summarised in Appendix 1. The ELNA indicates that 23.5ha of employment land is needed within Ipswich Borough to meet the B Class element of forecast job growth between 2011 and 2031. The total jobs growth forecast is 12,365 jobs, whereas the ELNA calculates that 4,580 gross (4,020 net) of these will relate to B Class uses (mainly B1a/b and B8 Class uses). This reflects a forecast continued reduction in manufacturing and general industry jobs (B1c and B2 uses) and growth in office uses and distribution, as suggested by the growth sectors of professional and business services and wholesale and land transport.
9. Policy CS13 allocates at least 30ha of land and a separate strategic employment site of 10ha, totalling at least 40ha.
10. The 23.5ha requirement identified in the Employment Land Needs Assessment (ELNA) is a net figure. Whilst the requirement for 'at least 30ha' of land coupled with the

⁵ CLG, 1987, *Town and Country Planning Use Classes Order (as amended)*, CDL references NCD12-13a

⁶ GVA Grimley, *Suffolk Haven Gateway Employment Land Review and Strategic Sites Study*, CDL reference SCD11

⁷ Ipswich Borough Council, October 2015, *Employment Topic Paper*, CDL reference LPCD40.

⁸ Nathaniel Lichfield and Partners, 2016, *Employment Land Needs Assessment for Ipswich and Waveney Economic Areas*, CDL reference PSCD10

strategic employment site is 16.5ha more than the ELNA land requirement, this is needed in order to ensure that a range of site sizes and locations will be available for potential employment development over the plan period. The conclusions of the ELNA state that, to ensure a flexible and responsive policy approach, it will be necessary not just to focus on the forecast quantitative requirements.

11. The ELNA identifies that there are businesses which are currently in accommodation which does not meet their needs. Paragraph 6.21 of the ELNA specifically highlights these issues as the age and size of premises, inadequate road access and on-site parking, poor building services, social issues in the local areas, and environmentally inefficient buildings, as key factors. Further paragraph 6.23 states that around 50% of businesses surveyed as part of the production of the ELNA indicated that they had had difficulty finding suitable premises within the sub-region.
12. The 23.5ha net requirement in the ELNA includes a net decrease in the requirement for B2 floorspace in Ipswich between 2011 and 2031. However, this does not mean there will be no demand for new B2 premises as illustrated by the recent planning application for B1, B2 and B8 floorspace at Central Avenue (IP/16/00103/FUL). As such, many of the employment allocations provide for flexibility by setting out support for a range of B class uses. In enabling some existing businesses to relocate to more suitable premises, the employment land supply could help free up old, unsuitable employment sites for alternative uses. A degree of over-allocation is also considered prudent, in order to build in flexibility to allow the plan to respond to changes in economic circumstances over the plan period.
13. Allocating 23.5ha of land for employment uses would not reflect these qualitative needs.
14. A 'no policy' alternative to CS13 was considered through the Sustainability Appraisal (SA) process⁹ and concluded that having a policy in place would be more likely to focus jobs into accessible locations and encourage job creation.
15. A proposed Pre-Submission Main Modification to CS13 aims to clarify that the jobs target set out in the policy is approximate and applies to the Borough area and not the town of Ipswich which extends beyond the administrative boundary.

Effective

16. The land allocation is deliverable, as the sites identified through policy SP5 exceed 30ha. The Council, therefore, concludes that the employment land allocations made through policy CS13 are soundly based.

6.2 Are the site allocations in connection with employment development soundly-based? If you contend that they are not how should they be modified?

Consistency with National Policy

17. The employment land allocations made through policy SP5 of the Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document for single and mixed use B class development represent proactive planning to meet the development needs of business in Ipswich, in accordance with the NPPF. Sites which have been available for some time and have not yet been developed have been

⁹ Arcadis, 4 Dec 2015, Strategic Environmental Assessment and Sustainability Appraisal, Core Strategy and Policies DPD Review, CDL reference SUCD09

reviewed in accordance with NPPF paragraph 22 and, where appropriate, re-allocated to alternative uses.

Positively Prepared

18. Site allocations have been considered in terms of forecast jobs growth and the likely sectoral and locational demand of that growth, alternative uses and deliverability. They provide a range of locations to meet the needs of different sectors over the plan period and, as far as possible in a tightly bounded Borough, offer a range of site sizes.

Justified

19. The employment land allocations accord with the Council's spatial strategy for employment land and reflect the commercial property market sub areas identified through the ELNA as well as wider economic development aims, including the establishment of new Enterprise Zones. Paragraphs 75–87 of the Employment Topic Paper explain how the allocations in the Local Plan sit within the wider context of promoting economic growth across Ipswich and the New Anglia LEP area.
20. The key focus for office development in the plan is the Princes Street Corridor within the town centre, which links the railway station to the Central Shopping Area. It includes allocations IP051 and IP094 for office use and IP015 for mixed use including some office floorspace. Part of the Princes Street corridor now has Enterprise Zone status. A short distance to the east is the Island Site IP037, which is identified as a major Waterfront development opportunity and also now enjoys Enterprise Zone status on part. Outside IP-One, allocations primarily provide opportunities in the A14 corridor, in the vicinity of junction 57 Nacton Road (e.g. IP152, IP150c, IP146), junction 55 Copdock Interchange (IP147) and junction 53 Whitehouse (IP140). In addition land is identified at Sandyhill Lane close to Ipswich Port (IP058, IP067, IP099). Futura Park is identified as a strategic employment site of 10ha and also now has Enterprise Zone status.
21. In respect of the allocation at Airport Farm Kennels, north of A14 (IP152), a statement of common ground with the Suffolk Coast and Heaths Area of Outstanding Natural Beauty Partnership and Suffolk Coastal District Council has been signed to support the deliverability of the site. This document is included as Appendix 3.

Effective

22. Throughout the plan process, the Council has sought to work with landowners where possible to ensure the deliverability of employment land allocations. There is a landowner objection from British Energy to the allocation of site IP067 the Former British Energy Site for employment development, with a request for some housing on the site. The Council previously explored this possibility through the Preferred Options stage of plan preparation¹⁰. However, feedback from Anglian Water¹¹ and verbal advice from the Council's Environmental Health Team indicated that the site's proximity to the water recycling centre renders residential use inappropriate.
23. Some sites will become available in the medium to long term, because of physical constraints which need to be addressed. The site sheets included as Appendix 3A to the Site Allocations Plan identify constraints affecting the sites¹².

¹⁰ Ipswich Borough Council, 2007, Site Allocations and Policies Preferred Options, CDL reference LPCD07

¹¹ Anglian Water email communication, 1/6/16, Sites IP058 and IP067, CDL reference PSCD26

¹² Ipswich Borough Council, Site Allocations and Policies (incorporating IP-One Area Action Plan DPD, CDL reference SUCD3

24. Whole Plan viability testing has been carried out¹³. It identifies (commentary, 3.14) that speculative commercial development is not currently viable in Ipswich, not because of accumulating policy costs but rather a lack of demand at this point in time. It states that some allocated sites could reasonably be developed with a pre-let or forward-sale in place, whilst there are opportunities for new commercial development in Ipswich to secure Regional Aid that would improve the viability position. This is echoed by the conclusions of the ELNA. However there is a redevelopment of an office building on Princes Street, which is speculative development.
25. The Council, therefore, concludes that the employment site allocations made through policy SP5 are soundly based.

6.3 The plans allocate sites totalling approximately 59ha for new employment developed. Is this soundly-based in the light of the identified requirement for 23.5ha (net) of employment land and policy CS13's provision that at least 30ha of employment land (plus 10ha at Futura Park) will be allocated? Is there potential for some of the allocated employment sites to be allocated for alternative uses?

Consistency with national policy

26. As above, the employment land allocations made through policies SP5 and CS13 are considered to represent positive planning to meet the economic needs of the Borough and the Ipswich Economic Area.

Positively Prepared

27. The ELNA identifies that B1 and B8 uses will account for most of the (net) B class jobs growth over the plan period. The location of the site allocations within IP-One (the town centre and Waterfront) and the A14 corridor fit with the economic drivers identified for the Ipswich Economic Area. Allocating more than the ELNA net requirement provides for sufficient choice in type of site and location to provide flexibility for businesses.

Justified

28. Job capacities were estimated for the allocated sites through the Employment Topic Paper¹⁴ and have been updated at Appendix 2 to reflect the ELNA job density assumptions. In purely quantitative terms, the proposed site allocations provide sufficient land to deliver an estimated 7,597 B class jobs.
29. However, taking into account quality issues, constraints on delivery, the market and the locational preferences of the key sectors, an oversupply is considered reasonable in order to ensure land is available throughout the plan period, to provide choice, satisfy demand and provide flexibility. In the context of the Borough's tightly drawn boundary and limited possibilities for future land supply within it, ensuring that a sufficiently large pool of employment sites will be available over the plan period represents a sound strategy.
30. Specifically, sites are likely to prove attractive to businesses for different reasons. For example, sites IP058, IP067 and IP099 are suitable for employment uses in planning

¹³ Peter Brett Associates 2014, *Viability Testing for the Ipswich Development Plan and Commentary*, CDL references LPCD26 and LPCD27

¹⁴ Ipswich Borough Council, October 2015, *Employment Topic Paper*, CDL reference LPCD40

terms, but are less well related to the A14 corridor than sites at/close to Ransomes Europark or the land north of Whitton Lane. Sites on the eastern side of Ipswich along the A14 are also located in close proximity to the Port of Felixstowe, which is a key driver of employment in the Ipswich Economic Area as identified in the ELNA. 7.13ha of employment land proposed for allocation is as part of mixed use development and therefore less likely to appeal to individual businesses looking to relocate but may be more attractive to a larger developer.

31. The lack of space within the Borough is considered to increase the imperative to provide a range of sites. As many of the sites are relatively small and have constraints to address (see Appendix 2), it is of heightened importance that a range of sites is provided. There is a relative lack of large, unconstrained sites which could be configured to meet varying occupants' needs.
32. Alternative uses for many of the employment allocations were considered at the Issues and Options and Preferred Options stages of plan preparation. The current allocations are the result of considering, and consulting the public and landowners on, appropriate uses for the sites. Alternative uses have also been assessed through the SA report for the Site Allocations Plan (Appendix D)¹⁵.
33. The suitability of sites for residential development is also considered through the Strategic Housing Land Availability Assessment (SHLAA)¹⁶. Some of the sites allocated for 100% employment use are considered to be unsuitable for residential use. Others are of such importance by virtue of their size, location and relationship to the market, that they form a key plank in the Council's employment land strategy. Appendix 2 indicates alternatives considered for sites and why the Council considers employment use to be the most appropriate for them.

Effective

34. The rationale behind allocating 59ha against a net requirement for 23.5ha is based upon the need to provide for flexibility and choice; take account of the qualitative needs of businesses; reflect the ELNA advice to focus not only on the quantitative requirement; and provide the Borough with the best opportunity to capitalise on the strengths of the different market sectors and segments over the whole plan period in order to deliver economic growth.
35. The 59ha includes sites with differing characteristics across varying locations in the Borough and 7.13ha of mixed use development.
36. The Council, therefore, concludes that the employment site allocations made through policy SP5 are soundly based.

6.4 Is policy DM25 soundly-based? If you contend that it is not how should it be modified?

Consistency with national policy

37. Please see 6.1 above.

¹⁵ Arcadis, 4 Dec 2015, Strategic Environmental Assessment and Sustainability Appraisal, Site Allocations and Policies (incorporating IP-One AAP) DPD, CDL reference SUCD10

¹⁶ Ipswich Borough Council, 2013, *Strategic Housing Land Availability Assessment Update*, CDL reference ICD11

Positively Prepared

38. The policy forms a key part of the Plan's employment strategy by protecting existing employment areas or uses where still appropriate. The Employment Areas listed in the policy are those which are considered to remain important, consolidated areas in which businesses can operate.
39. As a criteria-based policy, there is some inherent flexibility. Greater flexibility regarding potential change of use to non-B class uses is extended to sites in employment use outside the Employment Areas. This reflects local experience of such sites offering greater potential to be suitable for alternative uses, including residential uses. An example is allocation IP188 Websters.

Justified

40. The 1997 Ipswich Local Plan identified 24 Employment Areas in Ipswich¹⁷. The Core Strategy Review rationalises these into sixteen designated Employment Areas including two new areas. They are distributed broadly along an axis from the north western edge of the Borough, through the IP-One area, which includes the town centre and the Port, and out to the south eastern edge. They represent very significant clusters of jobs accessible from nearby residential areas, and provide accommodation for many businesses, e.g. Whitehouse Industrial Estate contains 114 units¹⁸.
41. As consolidated employment areas, they facilitate longer hours of operation for businesses located within them without the risk of causing nuisance to residential amenity. The Council's annual monitoring of the areas shows that there is a turnover of premises each year. This suggests that the areas play a role in supporting new businesses starting up and existing businesses expanding or adjusting their operations.
42. Given the importance of the Employment Areas for providing jobs, policy DM25 protects them for B class uses.
43. The policy also protects sites and premises used or allocated for employment uses outside the Employment Areas for employment uses, but here it provides greater flexibility regarding change of use in accordance with NPPF paragraph 22. Overall, the policy helps to ensure that the Local Plan supports sustainable economic growth in accordance with the NPPF.
44. A proposed Pre-Submission Main Modification sets out criteria for the consideration of Starter Homes on employment sites or within Employment Areas, in response to a Ministerial Statement dated 2nd March 2015. The Council considered it necessary to add the section about Starter Homes to the policy to provide clarity and ensure that the initiative is implemented in a way that does not undermine policies promoting sustainable economic growth in the Borough.
45. A further proposed Pre-Submission Main Modification clarifies that waste facilities could be considered in Employment Areas where compatible with adjacent uses.
46. The Government has recently changed permitted development rights through the Town and Country Planning (General Permitted Development) (England) Order 2015¹⁹. The

¹⁷ Ipswich Borough Council, 1997, *Ipswich Local Plan*, CDL reference LPCD01 – policy EMP2

¹⁸ Ipswich Borough Council, 2015, *Employment Land Availability Report*, CDL reference ICD14a

¹⁹ CLG 2015 *Town and Country Planning (General Permitted Development) (England) Order*, CDL reference NCD12-13a

changes mean that in certain instances, planning permission does not need to be obtained for a change of use from offices (B1a) to a dwellinghouse (C3). A Prior Notification application needs to be submitted and can only consider the impact of the change of use in respect of its impact on the highway, contamination and flood risk.

47. Between 2013 and 1st April 2015, the Council received 21 Prior Notification applications, which have been approved. A further three have been withdrawn and one has been refused. These applications have the potential to result in the loss of 16,685 sq m of office accommodation across the town, with a total of 15,289 sq m already completed or underway. It is expected that the main impact of this change to permitted development will fall within the IP-One area, which could harm job provision within central Ipswich. However, if the converted office premises are outdated and the new residential use contributes to vitality and viability, there could be a positive regeneration outcome. The Council is keeping it under review.
48. Further permitted development changes have also been introduced which allow the change of use from B8 storage or B1c light industrial to a dwellinghouse, if the floor area involved is up to 500 sq m. This change could have a greater impact in the Employment Areas where these uses are focused. The Council will again monitor changes made under this new provision in relation to the operation of the Employment Areas.

Effective

49. The 1997 Ipswich Local Plan set out the approach of protecting Employment Areas through policy EMP2. The approach was continued through policy DM25 of the adopted Core Strategy and is considered to have worked effectively over the whole period to protect employment land where appropriate. It has, however, allowed obsolete employment premises to come forward for alternative uses where appropriate in relation to other plan objectives, for example regenerating the IP-One area (e.g. the residential development on the former premises of Compair Reavell).
50. The Council, therefore, concludes that the employment policies are soundly based.

Appendix 1 Employment Land Needs Assessment for Ipswich and Waveney Economic Areas, March 2016 – key findings for the Ipswich Economic Area

- The Ipswich Economic Area (covering Ipswich Borough and Suffolk Coastal, Mid Suffolk and Babergh Districts) has recorded strong population growth in recent years. Growth in workforce jobs growth has been uneven geographically, with Ipswich maintaining the largest workforce. Key sectors in employment terms are public administration, health and education; retail and wholesale; and professional and business services.
- Business growth has lagged behind regional and national averages in recent years and the majority of businesses are small firms employing up to four workers. Employment space is dominated by industrial uses, with the largest concentration in Ipswich. Most new development in recent years has been industrial floorspace.
- The Port of Felixstowe has a significant economic influence from an industrial perspective and the A14 represents the key commercial property market driver in the Ipswich Economic Area.
- The Ipswich Economic Area is generally perceived as a good industrial location. Demand is largely localised with very few examples of inward investment in the area. Industrial supply has continued to tighten, with local property agents pointing to a particular gap in the market for industrial units up to 15,000sq.ft.
- The office market is significantly weaker than industrial, with very few established, recognised office centres outside of Ipswich itself.
- The overall net floorspace requirements related to a baseline East of England Forecasting Model (EEFM) growth scenario is 439,115 sq m in the Ipswich Economic Area, which translates broadly to 88.5ha of land, two thirds of which is for office uses. For Ipswich, this means a land requirement of 23.5ha for B class uses to 2031. This excludes any potential effects from the development of Sizewell C which are not included in the EEFM baseline.
- The area contains a number of commercial property market sub-areas, including the Felixstowe/A14 corridor (relating to freight and distribution), a wider Ipswich market comprising town centre and out of centre business and industrial parks and nearby settlements such as Great Blakenham and Claydon, and the A140 corridor.
- The land supply needs to be assessed in terms of its quality and fitness for purpose. There is scope to improve the supply of B class space to support future growth within the area's key sectors. Existing sites and premises are reported to not always be well suited to meet the needs of some of the growth sectors, and existing businesses surveyed reported issues including a shortage of affordable and modern premises, high rents and rates, and limited on-site car parking.

Appendix 2 Employment allocations and alternative uses considered

SITE REFERENCE	ADDRESS	SITE AREA (ha)	% OF SITE FOR B CLASS USES	POTENTIAL EMPLOYMENT USES ²⁰	ESTIMATE OF JOBS (BASED ON ELNA JOB DENSITY)	ALTERNATIVES CONSIDERED	SUITABILITY FOR RESIDENTIAL OR EMPLOYMENT USE
IP058 Formerly UC061 / ELR25	Former Volvo Site, Raeburn Road South / Sandyhill Lane	5.82	100	B8 small scale. Unsuitable for B2 as sloping. Local scale warehousing or storage most likely.	313	<ul style="list-style-type: none"> • 50% residential 50% employment • Employment • Housing • Retail • 50% open space 50% employment <p>Note – SA concludes that retail use would be non-compliant with policy as it is non-town centre.</p>	<p>The SHLAA (CDL reference ICD11) was updated in 2013 to respond to advice from the Council’s Environmental Health Department. It also reflects Anglian Water’s request for a cordon sanitaire of 400m around a ‘water recycling centre’ (CDL reference PSCD26).</p> <p>The 2013 SHLAA concludes that ‘alternative uses to housing should be explored for the site as the neighbouring sewage works raises significant amenity concerns.’</p> <p>Therefore the site is unsuitable for housing. As an employment site, it is close to the Port and within a long-established Employment Area.</p>
IP067 Formerly UC070	Former British Energy site	4.66	100	B1b small business units - adjacent to office and residential.	233	<ul style="list-style-type: none"> • 50% residential 50% employment • Employment • Open space <p>Note – SA concludes</p>	<p>The SHLAA (CDL reference ICD11) was updated in 2013 to respond to advice from the Council’s Environmental Health Department. It also reflects Anglian Water’s request for a cordon sanitaire of 400m around a ‘water</p>

²⁰ These have been specified only for the purposes of estimating job creation – policy SP5 indicates suitability by B Class Use

SITE REFERENCE	ADDRESS	SITE AREA (ha)	% OF SITE FOR B CLASS USES	POTENTIAL EMPLOYMENT USES ²⁰	ESTIMATE OF JOBS (BASED ON ELNA JOB DENSITY)	ALTERNATIVES CONSIDERED	SUITABILITY FOR RESIDENTIAL OR EMPLOYMENT USE
						that open space is undeliverable as the landowner would not support it.	<p>recycling centre' (CDL reference PSCD26).</p> <p>The 2013 SHLAA concludes that 'alternative uses to housing should be explored for the site as the neighbouring sewage works raises significant amenity concerns.'</p> <p>Therefore the site is unsuitable for housing.</p> <p>As an employment site, it is close to the Port and within a long-established Employment Area.</p>
IP094 Formerly UC104 / ELR34	Rear of Grafton House	0.31	100	B1a general office	198	<ul style="list-style-type: none"> • 100% hotel • 20% employment 80% residential 	<p>The SA concluded that the proposed allocation would contribute to employment and economic objectives. The alternative of 80% residential and 20% employment would contribute to the housing objective but being in the flood zone, would have a negative score against the health objective.</p> <p>The alternatives of 100% hotel and of 100% employment would have similar impacts, although being in a flood zone, a hotel would have a negative impact on health.</p> <p>This is a vacant site in the River and Princes St Corridor opportunity area F</p>

SITE REFERENCE	ADDRESS	SITE AREA (ha)	% OF SITE FOR B CLASS USES	POTENTIAL EMPLOYMENT USES ²⁰	ESTIMATE OF JOBS (BASED ON ELNA JOB DENSITY)	ALTERNATIVES CONSIDERED	SUITABILITY FOR RESIDENTIAL OR EMPLOYMENT USE
							(although the site lies outside the Enterprise Zone). This area is the focus for new office development and the site is suitable for office use.
IP099 Formerly UC133 / ELR36	Part Former Volvo Site, Raeburn Road South	2.3	100	B8 small scale. Unsuitable for B2 as sloping. Local scale warehousing or storage most likely.	124	Only employment is appropriate because of proximity to the water recycling centre. No realistic alternative except non-allocation.	The site is unsuitable for housing owing to its proximity to the 'water recycling centre'. As an employment site, it is close to the Port and within a long-established Employment Area. Non allocation would not contribute to employment or economic objectives.
IP140	Land north of Whitton Lane	6.93	100	B1a call centre, B1a small business units, B8 large scale - large site close to A14	347 108 164	<ul style="list-style-type: none"> • 50% employment 30% housing 20% open space • An alternative of 100% housing is not realistic due to the Core Strategy commitment to deliver the 'green rim' in this vicinity. • Employment and park and ride extension was also considered at Regulation 18 stage 	IP140b has an area of 6.93ha and is a greenfield site. The site is grassland and would have the potential for transboundary effects attracting workers from Mid Suffolk and potentially having an effect on traffic moving in and out of Ipswich concentrated in the north west and particularly on the A14. However, the allocation would contribute to economic and employment objectives. The alternative of 50% employment and 30% housing and 20% open space could also result in an increase in traffic but would contribute to housing, health, economic and biodiversity objectives. The site is constrained by overhead

SITE REFERENCE	ADDRESS	SITE AREA (ha)	% OF SITE FOR B CLASS USES	POTENTIAL EMPLOYMENT USES ²⁰	ESTIMATE OF JOBS (BASED ON ELNA JOB DENSITY)	ALTERNATIVES CONSIDERED	SUITABILITY FOR RESIDENTIAL OR EMPLOYMENT USE
							<p>power lines and a pipeline. The SHLAA 2013 (ICD11) also identified as constraints its close proximity to the A14 and the park and ride site and associated noise. The park and ride site is not currently in use as such, however, the issues from the A14 remain. Any development on the site would have significant impacts on biodiversity and soil quality. There could also be a significant impact due to loss of potential for food production from the loss of agricultural land.</p> <p>The SHLAA concludes that the site is not suitable for residential use. However, it is well suited to employment use: the site is well located in relation to the A14 and employment uses on the site are being actively promoted by the developer.</p>
IP146 Formerly ELR43	Ransomes Europark (East)	5.29	100	B1a serviced business centre and business park B2 reflecting recent relocation of Hubbard	202 215	This site lies in a designated employment area therefore there is no realistic alternative except non-allocation.	The sites are the final pieces of land available in Ransomes Europark which is an established employment area. To the east, Suffolk Coastal District Council has an allocation for an extension to the employment area in their Local Plan. Residential would not therefore be suitable.

SITE REFERENCE	ADDRESS	SITE AREA (ha)	% OF SITE FOR B CLASS USES	POTENTIAL EMPLOYMENT USES ²⁰	ESTIMATE OF JOBS (BASED ON ELNA JOB DENSITY)	ALTERNATIVES CONSIDERED	SUITABILITY FOR RESIDENTIAL OR EMPLOYMENT USE
				Products Ltd which demonstrates demand			<p>The SHLAA Update 2013 (ICD11) concluded that the sites are not suitable for residential use because of the proximity of the railway line and the A14 and their importance for employment.</p> <p>This is greenfield land and is being marketed. It is in the A14 corridor and well related to Felixstowe Port – several shipping companies are already located there, e.g. Mediterranean Shipping Company. Therefore, it is realistic to assume it will come forward for employment uses.</p>
IP147 Formerly ELR44	Land between Railway Junction and Hadleigh Road	4.7	100	B8 Small Scale storage and distribution	253	This site lies in a designated employment area therefore there is no realistic alternative except non-allocation.	<p>The SHLAA Update 2013 (ICD11) concludes that the site is unsuitable for residential use because of its importance as an employment site and it is located between two railway lines. The site was previously constrained by its access and the safeguarded line for the rail chord. A new access has been provided from Hadleigh Road and the rail chord is now built and operational. Part of the site now has planning permission for employment uses. It is largely vacant therefore realistic to assume it will come forward.</p>

SITE REFERENCE	ADDRESS	SITE AREA (ha)	% OF SITE FOR B CLASS USES	POTENTIAL EMPLOYMENT USES ²⁰	ESTIMATE OF JOBS (BASED ON ELNA JOB DENSITY)	ALTERNATIVES CONSIDERED	SUITABILITY FOR RESIDENTIAL OR EMPLOYMENT USE
IP150c	Land South of Ravenswood	4.62	100	B1a serviced business centre and business park B1b High tech R & D	704 296	<ul style="list-style-type: none"> • 50% residential, 50% employment • 100% employment <p>The site was allocated for 100% residential at Regulation 18 stage</p>	<p>The SA concludes that the residential use would contribute to housing and health objectives. However, residential use would result in increased traffic in the area due to private car use, and reduce air quality. There would also be loss of amenity to nearby residents due to the loss of informal open space. 100% employment use would contribute to employment and economic objectives, but there would be no contribution to housing or health objectives.</p> <p>50% residential 50% employment would contribute to housing and economic objectives. This alternative may be more sustainable than 100% employment as it contributes to both social and economic objectives.</p> <p>The SHLAA 2010 (ICD09) grouped the site with IP150 a and b and considered residential use deliverable on part, according with the implementation of an existing planning permission.</p> <p>The ELNA (CDL reference PSCD10) highlights the importance of Felixstowe Port and the A14 corridor as an economic driver. It also identifies office markets in central and outer Ipswich</p>

SITE REFERENCE	ADDRESS	SITE AREA (ha)	% OF SITE FOR B CLASS USES	POTENTIAL EMPLOYMENT USES ²⁰	ESTIMATE OF JOBS (BASED ON ELNA JOB DENSITY)	ALTERNATIVES CONSIDERED	SUITABILITY FOR RESIDENTIAL OR EMPLOYMENT USE
							and in the eastern Ipswich fringe (paragraphs 4.26 to 4.28) and the need for high grade provision with easy access to the A12/14. This site in the Nacton Road employment corridor is well placed to take advantage of the market strengths and provide office or research and development uses which are compatible with adjacent residential uses. Therefore the Council considers it appropriate to allocate the site for employment uses.
IP152	Airport Farm Kennels North of A14	7.37	100	B1b Science park and small business units B8 Large Scale subject to access issues being resolved (as close to A14 and Felixstowe)	553 174	<ul style="list-style-type: none"> • 50% Park & Ride and 50% agriculture • 80% residential and 20% open space • 50% P & R and 50% employment. 	<p>This site has an area of 7.37 ha, which is currently in agricultural use and is a greenfield site. The site is adjacent to the proposed sports park (IP150b) and employment allocation (IP150c) and countryside. The allocation is for 100% employment, which would contribute to economic objectives. However, a greenfield site, there are potential impacts on biodiversity, food production and the quality of soil resources.</p> <p>The alternative of 50% park and ride and 50% agriculture would result in increased traffic and impact on air quality in the area but would have a benefit within central Ipswich.</p>

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							<p>50% retained as agriculture would benefit soil and food production. The alternative of 80% residential and 20% open space would contribute to the housing, health, amenity and biodiversity objectives but not economic objectives.</p> <p>The alternative 50% park and ride and 50% employment would increase traffic in the area but the park and ride may benefit the town centre. However park and ride is not deliverable on the site. Additional constraints are that part of the site lies within the AONB and there is potential for noise from the A14. The SHLAA 2010 (ICD09) identified the site as unavailable and undeliverable for residential use. Access is a further constraint which would need to be addressed.</p> <p>As with IP150c above, the ELNA (CDL reference PSCD10) highlights the importance of Felixstowe Port and the A14 corridor as an economic driver. This site, in the Nacton Road employment corridor and adjacent to the A14, is one of the Borough's largest employment sites and is well placed to</p>

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							take advantage of the market strengths. The site could be suitable for a combination of uses as at Ransomes Europark, ranging from business units to warehousing and distribution. The landowner also wishes the site to come forward for employment uses. Therefore the Council considers it appropriate for employment uses.
Sites allocated for 100% B class use – sub-total		42			3884		
IP004 Formerly UC004 / ELR2	Bus Depot Sir Alf Ramsey Way	1.07	50	B1a General Office	205	<ul style="list-style-type: none"> • 100% residential • 100% employment 	<p>The site is allocated for residential and office uses. Alternative of 100% residential use will have more negative impacts on air quality and water resources but contribute to housing SA objective and health.</p> <p>The alternative of 100% employment use will have a more significant contribution to economic objectives.</p> <p>The current allocation would contribute to both social and economic objectives. It is reliant on the prior relocation of the bus depot and falls just outside the River and Princes St Corridor opportunity area. Part of the site is occupied by the locally listed Tram Shed (Constantine Road Bus Depot, ICD61).</p>

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							Employment uses are considered to provide the potential for a more sympathetic conversion than residential uses. Flood risk is also a consideration in this area.
IP011b Formerly UC011 / ELR3	Smart Street, Foundation Street	0.69	20	B1a General Office	53	<ul style="list-style-type: none"> • 100% housing • 100% B1 employment • 100% leisure • Mix of the above (30% each) plus retail 	<p>The site is allocated for residential and employment (B1). The proposed uses will make contributions to housing needs and employment generation. 100% housing will increase traffic in the area, which is within an AQMA. 100% B1 employment will contribute to economic SA Objectives but employment use may not address housing needs in Ipswich. 100% leisure alternative would contribute to social and health objectives.</p> <p>Mixed use alternative (housing, employment and leisure) would contribute to social, health and economic objectives.</p> <p>Redevelopment is reliant on relocation of existing uses (First Bus depot) but has landowner support. It is located within the Merchant Quarter opportunity area and in a town centre location highly</p>

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							<p>suitable for B1a.</p> <p>Residential use on the ground floor may not be desirable because of air quality issues on the Star Lane gyratory.</p>
IP015 Formerly ELR4	West End Road Car Park	1.22	10	B1a General Office	78	<ul style="list-style-type: none"> • housing • employment, • retain existing use (surface car park) <p>Mix of the above:</p> <ul style="list-style-type: none"> • 50% car parking and 50% housing • 50% car parking and 50% B1 employment 	<p>The site is allocated for car parking, residential and offices. It is currently used as a surface level car park and is owned by IBC.</p> <p>IP015 has an area of 1.21ha and is near an AQMA. Since the site is currently a car park, the proposed residential use, employment plus a car park would have neutral effect on air quality and traffic when compared to the existing baseline. The allocated use would contribute to housing and economic objectives. However, an alternative to have less parking should be considered to reduce impacts on air quality and traffic.</p> <p>The alternative of 100% parking, which is the existing use, would have a neutral effect on air quality and traffic. However, the opportunity to contribute to social (housing) and economic (offices) objectives as the proposed</p>

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							<p>allocation would be lost. 50% parking and 50% housing would contribute to the housing SA objective and would have less impact on air quality than its existing use. 50% parking and 50% employment would contribute to economic objectives and would have less negative effects on traffic and air quality in relation to the baseline.</p> <p>The site lies within the River and Princes Street Corridor opportunity area, although it is outside the enterprise zone. It is well located for the railway station also and relates well to the civic/office quarter around Russell Road.</p>
IP035 Formerly UC036	KEY STREET/ BURTON'S SITE	0.54	30	B1a General Office	21	<ul style="list-style-type: none"> • 80% housing and 20% employment; • 60% large scale retail, 20% leisure and 20% car parking. <p>Planning application 11/00708/FUL 8342 sq m B1; 1689 A1/A3; Hotels 335 bedrooms but unlikely to be</p>	<p>The site is allocated for employment, hotel, leisure and small scale retail. This reflected an extant planning permission, however it is not now expected to come forward in that form.</p> <p>The allocation for employment use will contribute to economic SA objectives. The alternative proposed, which is 80% housing will contribute to SA objectives but not as significantly to economic objectives. Also, it may have negative</p>

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						implemented	<p>effects on air quality and traffic and the site is already within an AQMA. The alternative of large scale retail, leisure and car parking would have the greatest potential for traffic generation.</p> <p>The site is currently being used as a car park temporarily. The Council is in discussions with landowner. The site is affected by heritage constraints. Any residential use would need to have regard to air quality and flood risk.</p>
IP037 Formerly ELR8	ISLAND SITE	6.02	30	B1a serviced business centre and business park B1b Science park and small business units B1b High tech R & D	367 90 116	<ul style="list-style-type: none"> 70% housing, 20% employment and small scale food and drink (including retaining boat building), 10% open space; 20% housing, 20% open space and 60% employment, cultural (e.g. museum or concert venue) and small scale food and drink (including retaining boat building). 100% open space is 	<p>The site is allocated for residential use on approximately half, B1 employment, plus retaining activities related to the marina, and open space. The precise proportions are to be agreed through a master planning exercise.</p> <p>This 6.02ha site is close to an area designated as AQMA along Star Lane, College Street, and Bridge Street located to the north and northeast of the island.</p> <p>The site will contribute to an increase of new residents in the area as it is anticipated that 50% of the land will be allocated for residential use with indicative capacity of 271 new homes. As a result of the influx of a significant</p>

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						considered undeliverable on viability grounds.	<p>number of new residents the traffic is likely to increase on the road that connects the island to the mainland. In addition, IP037 has the potential to generate traffic in peak hours from users of the office or leisure facilities. The site is currently not served by public transport (due to its existing use) and the additional vehicular access may lead to increase in the use of private cars in the area. Potential negative effects may occur as a result of congestion at junctions with Grey Friars Road/A1022 and Bridge Street/A137.</p> <p>The alternative option of 70% housing, 20% employment and 10% open space would generate more traffic on surrounding roads but would have a greater contribution to housing and health SA Objectives.</p> <p>The alternative option of 20% housing, 20% open space and 60% employment would generate less traffic than the proposed allocation but would have a greater contribution to economic objectives and less contribution to housing and health.</p> <p>Since the assessment of alternatives</p>

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							<p>was undertaken, part of the Island Site (approximately 2ha) has also been awarded Enterprise Zone status, which would further reduce the suitability for increased residential development on the site. The site is ideally placed to offer accommodation to uses such as spin-off high tech activities associated with the University which is located just across the Wet Dock.</p> <p>It represents a key remaining regeneration opportunity and lies within the Island Site Opportunity Area and the Wet Dock Conservation Area (ICD73).</p>
IP043	Commercial Buildings & Jewish Burial Ground, Star Lane	0.7	20	B1a General Office	54	<ul style="list-style-type: none"> 60% B1 employment and 40% leisure; A mix of 60% residential, 20% employment and 20% small scale retail which broadly reflects a previous planning application ref 07/00643 	<p>The site is allocated for residential use (on approximately 80% of the site) and B1 uses.</p> <p>This site (0.70 ha) seeks to provide 50 dwellings. The site is within an AQMA and residential use will result in extra traffic, which will impact on air quality. The alternative 60% employment and 40% leisure would have less traffic impacts than the allocated use but would not contribute to the SA housing objective. The leisure use would</p>

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							<p>contribute to health and other social objectives, such as reducing social exclusion and providing opportunities for public participation.</p> <p>The alternative 60% residential, 20% employment and 20% small scale retail would result in less traffic than the proposed allocation and still provide contribution to housing.</p> <p>The site is already allocated for mainly residential use. Alternative uses may be more appropriate at ground floor level because of air quality and flood risk constraints. It is within the town centre and the Merchant Quarter Opportunity Area.</p>
IP047 Formerly UC048	Land at Commercial Road	2.86	40	B1b High tech R & D	366	<ul style="list-style-type: none"> 20% housing, 20% leisure, 20% open space and 40% employment B1 at preferred options stage 	<p>This allocation was added to SP2, SP5 and SP6 as a Pre-Submission Main Modification, having previously been identified as a commitment through policy SP3. It is allocated for 40% residential use with 20% public open space and 40% office, leisure or hotel use.</p> <p>The site is located near the AQMA which is designated due to air pollution along Vernon Street and Bridge Street. It will contribute to an increase of new</p>

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							<p>residents in the area as it is anticipated that 129 new homes will be built (now revised to 103). As a result of a significant number of new residents, the traffic is likely to increase on key roads adjacent to the site albeit to a small extent.</p> <p>Allocating housing at IP047 would help to meet local housing needs whilst providing decent homes close to facilities which would help to improve quality of life and human health and would contribute towards reducing social exclusion supporting SA Objectives HW1, HW2 and ER1.</p> <p>The site is located on previously developed and potentially contaminated land. Remediation of this land would help to improve soil resources and would benefit SA Objective ET2. The provision of new office, leisure and hotel development will contribute towards providing employment opportunities and supporting economic growth, supporting SA Objectives ER2, ER4 and ER7.</p> <p>The allocation also includes 0.17ha of</p>

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							<p>open space which may have some minor benefits regarding health, landscape and climate change adaptation.</p> <p>Housing is already anticipated as a significant portion of the mix at this site. Office uses could be appropriate here between the two enterprise zones of the Island and Princes Street Corridor. It is also within the town centre and close to the station.</p>
IP051 Formerly UC054 / ELR19	Old Cattle Market, Portman Road,	2.21	80	B1a serviced business centre and business park B1a call centre	674 884	<ul style="list-style-type: none"> • 80% housing and 20% employment; the preferred option of 40% large scale leisure • 20% employment 20% residential 10% Hotel 10% small scale retail; • 50% retaining the existing use as car parking and 50% B1 office employment. • 100% housing is considered unrealistic as is it in the flood zone and would need less vulnerable uses on the ground floor. 	<p>The site is allocated for 80% B1a office use and 20% main town centre uses excluding retail. The proposed allocation would contribute to employment and economic objectives. The alternative of 80% housing and 20% employment will increase traffic and impact air quality. The site is near the football club stadium and there may be increase in traffic in the area during major sport events. Although Portman Road gets closed during events at the football ground, there could be noise and disturbance issues for housing adjacent to the ground. The preferred option of 40% large scale leisure, 20% employment, 20%</p>

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							<p>residential, 10% hotel and 10% small scale retail would contribute to economic and social objectives. The alternative of 50% retaining the existing use as car parking and 50% B1 office employment would contribute to employment objectives but the car parking would increase traffic in the area and adversely impact on air quality. This is the least sustainable option.</p> <p>The land is owned by Ipswich Borough Council and is located within the Princes Street corridor and Enterprise Zone, close to the railway station. It is considered one of the sites to address the needs of the town centre office market identified through the ELNA (PSCD10).</p>
IP052 Formerly UC055 / ELR20	Land Between Lower Orwell Street and Star Lane	0.4	20	B1a General Office	31	<ul style="list-style-type: none"> • 100% employment • 100% leisure 	<p>This is a small site (0.40). The proposed allocation for residential and B1 uses would contribute to housing, health and economic objectives but residential use will increase traffic in this area which is within an AQMA.</p> <p>The alternative of 100% employment would contribute to employment and economic objectives.</p>

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							<p>The alternative of 100% leisure would contribute to health and social objectives, such as reducing social exclusion. It would also contribute to the vitality of the town centre.</p> <p>The alternatives of 100% employment and 100% leisure would have less impact on traffic than the proposed allocation.</p> <p>There are existing uses on site, including a temporary permission for use of part as a bowling centre, therefore it is possible it would come forward in phases. It is considered unlikely that the approved student accommodation scheme will come forward. The site lies within the Merchant Quarter Opportunity Area and the town centre.</p>
IP054 Formerly UC057 / ELR22	Land Between Old Cattle Market & Star Lane	1.72	70	B1a General Office	154	<ul style="list-style-type: none"> • 40% retain existing uses (W of Turret Lane) 60% mix of offices, leisure and car parking; • 25% housing 25% B1 employment 25% large scale retail 25% car parking. 	<p>This 1.72ha site is allocated for mixed use development – 70% B1a and 30% residential and possible short-stay car parking - which may generate traffic on Star Lane and key town centre roads. Although the site is well served by public transport and near two bus stations, the number of new residents suggests potential for congestion at key junctions in the town centre.</p> <p>The alternative of 40% retain existing</p>

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							<p>uses (W of Turret Lane) and 60% mix of offices, leisure and car parking (this mix broadly reflects a previous proposal) would contribute to economic, social and health objectives, but the car parking would increase traffic to the area.</p> <p>The alternative of 25% housing 25% B1 employment 25% large scale retail and 25% car parking would contribute less to the SA objective on housing but would contribute to employment and economic objectives; car parking would increase traffic in the area.</p> <p>The site is in multiple ownerships. Whilst much of the eastern side is vacant, the remainder is dependent on existing uses relocating.</p> <p>This is an important town centre site which links the central shopping area to the Waterfront. It lies within the merchant Quarter Opportunity Area.</p>
IP132 Formerly UC247	Former St Peter's Warehouse, 4 Bridge Street	0.18	30	B1a General office	14	No alternatives were considered as the site had planning permission at the time the alternatives assessment was undertaken. However, the allocation	<p>This site was allocated through policies SP2 and SP5 at Pre-Submission Main Modifications stage.</p> <p>The B1a element could include leisure or small scale retail and is expected to occupy the lower two floors. It is essentially a residential-led allocation.</p>

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						is for residential-led mixed use.	
Sites allocated for mixed use incl. B class					3107		
Strategic Employment Site CS13 Formerly ELR41	Futura Park – Former Crane’s Factory Site	7.4	100	B2 B8 Large scale as close to A14	301 175	This site is carried forward from the adopted Core Strategy	The site is allocated as the Borough’s strategic employment site. Even with the reduced area (responding to recent planning permissions – see below) it is the largest employment site available within the Borough. It is located in south-east Ipswich, close to the A14 within the Nacton Road employment corridor and has Enterprise Zone status. Contamination on the site was addressed to allow employment uses. It would not be suitable for residential use owing to its location between adjoining employment uses and contamination issues.
Strategic Employment Site CS13	Futura Park – Former Crane’s Factory Site	2.6		Approved car dealerships including on site workshops 15/00790/FUL	131	This site is carried forward from the adopted Core Strategy	The site is allocated as the Borough’s strategic employment site. This section has recently gained planning permission for car dealerships including on-site workshops. It is located in south-east Ipswich, close to the A14 within the

SITE REFERENCE	ADDRESS	SITE AREA (ha)	% OF SITE FOR B CLASS USES	POTENTIAL EMPLOYMENT USES ²⁰	ESTIMATE OF JOBS (BASED ON ELNA JOB DENSITY)	ALTERNATIVES CONSIDERED	SUITABILITY FOR RESIDENTIAL OR EMPLOYMENT USE
							Nacton Road employment corridor and has Enterprise Zone status. Contamination on the site was addressed to allow employment uses. It would not be suitable for residential use owing to its location between adjoining employment uses and contamination issues.
					607		
Total job estimate					7598		

**Ipswich Borough Council Proposed Submission Site Allocations and Policies
(incorporating IP-One Area Action Plan) Development Plan Document, November 2014**

**Suffolk Coastal District Council Preferred Options Site Allocations and Area Specific
Policies Development Plan Document, October 2015**

Suffolk Coast and Heaths AONB Partnership

Statement of Common Ground on 31 May 2016

This statement relates to the proposed allocation through the emerging Ipswich Borough Council and Suffolk Coastal District Council Local Plans of two sites for economic development, as shown marked Areas 2 and 3 on the Map in Appendix A to this Statement of Common Ground and being located partly within and within the Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) (“the Sites”). This Statement of Common Ground has been drawn up in agreement between:

- i) The Suffolk Coast and Heaths AONB Partnership (“the Partnership”) and
 - ii) Ipswich Borough Council (“IBC”) and
 - iii) Suffolk Coastal District Council (“SCDC”).
-

1. Purpose of this Document

- 1.1 This document has been produced in order to clarify the position between the relevant parties named above on matters relating to the proposed allocation of the Sites. This will help advise the Inspectors for the respective examinations into IBC’s and SCDC’s Local Plan documents as referred to in this statement.
- 1.2 As a result of this Statement of Common Ground, the Partnership does not have an objection to the principle of the allocation of the Sites – one within IBC’s boundary and one within SCDC’s boundary – subject to certain safeguards. The third site (Area 1) on the map at Appendix A is not currently proposed for development.

2. Background

- 2.1 Natural England has a discretionary power under S.82(1) of the Countryside and Rights of Way Act 2000 (CRoW Act) to designate Areas of Outstanding Natural Beauty (AONBs) or to vary the boundary of an existing AONB. The Suffolk Coast and Heaths AONB was designated in March 1970.
- 2.2 The Countryside and Rights of Way Act 2000 Section 85(1) imposes a general duty on public bodies, including District Councils, as follows:
“In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty”.
- 2.3 The Partnership was set up in 1993 to ensure efficient and co-ordinated management of the AONB. It is made up of 25 organisations, who work together to conserve and enhance the designated landscape.
- 2.4 The Suffolk Coast and Heaths AONB Joint Advisory Committee oversees the work of the AONB Team and is made up of representative Members from the AONB's constituent Local Authorities. Its principal aim is to achieve the conservation and enhancement of the natural beauty of the area.
- 2.5 The Partnership seeks to champion the environmental quality of the AONB and support delivery of the AONB's statutory management plan.
- 2.6 IBC and SCDC are in the process of preparing site allocation development plan documents, which will in due course form part of each respective local planning authority's Local Plan. The relevant IBC plan is called the Ipswich Borough Council Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document, (the “Ipswich Site Allocations Plan”) and it was submitted for independent examination in December 2015. The relevant SCDC plan is called the Suffolk Coastal Site Allocations and Area Specific Policies Development Plan Document (the “Site Allocations Document”), which reached preferred options consultation stage in October / November 2015.

2.7 Through their plan preparation processes to date, IBC and SCDC have identified the need to allocate land for economic development, some of which lies wholly or partly within the Suffolk Coast and Heaths AONB, i.e. the Sites. A common feature of the Sites is their degree of actual and visual separation from the majority of the AONB by the A14 trunk road, this section of which was opened in 1982.

2.8 The two local planning authorities have therefore engaged jointly with the Partnership through the Joint Advisory Committee with regard to the possible future development potential of the Sites. The local planning authorities asked the Suffolk Coast and Heaths AONB Joint Advisory Committee to consider two possible actions as follows:

i. To request that Natural England review the AONB boundary in the vicinity of the Sites plus a third site not proposed for development (site 1 on the map at Appendix 1), with a view to re-aligning the AONB boundary along the southern edge of the A14 where it passes the sites; or :

ii. That the Joint Advisory Committee gives an 'in principle' support to the allocation of the Sites through Local Plan processes, provided that (1) due regard is paid to the duty on public bodies set out in The Countryside and Rights of Way Act 2000, Section 85 and (2) appropriate mitigation is provided.

2.9 The Joint Advisory Committee took this matter to the Partnership for discussion and agreement. The Suffolk Coast and Heaths AONB Joint Advisory Committee agreed at its meeting on 30th September 2015 that it would not consider requesting that Natural England review the AONB boundary in the vicinity of the two development sites (action i. above), but would be prepared to consider agreeing a common position with the local planning authorities (action ii. above). Minutes of these meetings are available from the Suffolk Coast and Heaths AONB staff team. This statement of common ground is the result of that process.

3. Areas of Common Ground

3.1 The agreed position of the three parties is set out below.

3.2 The Partnership recognises the importance of sustainable development and the economic wellbeing of the area. The Partnership notes that IBC and SCDC have identified potential development sites within the AONB. The Partnership notes that

the Sites identified have a degree of actual and visual separation from the majority of the AONB due to the route of the A14.

- 3.3 The Partnership recognises the need for and supports the economic development identified through the local planning process and the requirement for site allocations to help deliver future economic development and associated job opportunities.
- 3.4 The Partnership notes that any detrimental impact upon the natural beauty and special qualities of the AONB landscape should be mitigated appropriately. The Partnership supports the suggested approach by IBC and SCDC by which mitigation measures will be identified, i.e. through application of the mitigation hierarchy through site master planning or planning briefs prepared in consultation with the Partnership.
- 3.5 The Partnership considers that any development proposals within the proposed site allocations outlined above and identified in the Local Plans of IBC and SCDC should still explicitly consider the needs of the AONB, and take heed of national and local policy and should seek to conserve and enhance its natural beauty and special qualities and where this is not achieved, be appropriately mitigated.
- 3.6 Notwithstanding the above, the Partnership reserves the right to object to individual planning applications or site allocations which it considers fail to deliver adequate mitigation. In so doing, the Partnership may wish to take a collective position or respond independently of its constituent organisations on issues impacting upon the AONB.
- 3.7 IBC and SCDC acknowledge and welcome the Partnership's statements and commitments set out in paragraphs 3.1 - 3.6 (inclusive) above.
- 3.8 In turn, IBC and SCDC note the duty placed on them by virtue of section 85 of The Countryside and Rights of Way Act 2000 and agree to have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.

4. IBC's and SCDC's Emerging Local Plans

- 4.1 The Suffolk Coastal Site Allocations and Policies plan already refers to the need for the preparation of a development brief for the proposed economic development allocation Preferred Option SSP18 Ransomes, Nacton Heath, to address a range of

matters including impact on the landscape, including its natural beauty and special qualities.

- 4.2 The Ipswich Borough Site Allocations plan allocates site IP152 Airport Farm Kennels for employment uses through policy SP5 'Land allocated for employment use'. The policy, approved in November 2014, does not currently refer to the need for a development brief. However, the accompanying site sheet at Appendix 3A to the plan, which provides more information about the allocation, indicates that a master plan should be prepared for this site and sites to the north of it, in order to address access issues. The site sheet also refers to part of the site being within the AONB.
- 4.3 IBC has promoted Pre-Submission Modifications to the Site Allocations Plan which include the following Additional Modification: 'Add to the allocation and site sheet a note that significant new landscaping would be required to maintain the view from the A14 across the site.' The reason is to protect the adjacent AONB.
- 4.4 IBC agrees to promote through the plan examination process the following amended wording as a further Additional Modification to the site sheet, to replace the above:
- '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.'
- 4.5 In addition, IBC agrees to promote through the plan examination process the following additional wording to be added to the allocation of Site IP152 Airport Farm Kennels through policy SP5:
- 'Development will be subject to the preparation of a development brief to address matters including the nationally designated Area of Outstanding Natural Beauty.'
- 4.6 The requirement for a development brief will enable IBC and SCDC to aid mitigation where required for the development of the Sites (whole or in part), as referred to in paragraph 3.4 above. Further the new policy wording and revised site sheet wording would better reflect the areas of common ground defined above.

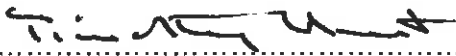
Signed:

Name:



Date: 31 May 2016

Cllr David Wood, Chairman, Suffolk Coast and Heaths AONB Partnership

Name:  Date: 2 June 2016

Ipswich Borough Council T.J.F. HUNT, SOLICITOR.

Name:  Date: 2nd June 2016

Philip Ridley BSc (Hons) MRTPI
Head of Planning and Coastal Management - Suffolk Coastal & Waveney District Councils

Appendix 1 Map showing the location of proposed development sites – site 2 and site 3.

